Print Form

Appendix C

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

Project Title: Signal Hill LLC Residence					
Lead Agency: Monterey County Resource Management Ag	ency - Planning	Contact Person: Luis Osorio			
Mailing Address: 168 West Alisal St., 2nd Floor		Phone: 831 755-5177			
City: Salinas	Zip: 93902	Zip: 93902 County: Monterey			
Project Location: County: Monterey	City/Nearest Com	munity: Pabble Beac			
Cross Streets: Signal Hill Road / 17-Mile Drive			Zip Code: 93953		
Longitude/Latitude (degrees, minutes and seconds):°	_′″N/°	W Tota	al Acres: 2		
Assessor's Parcel No.: 008-261-007-000			ge: Base:		
Within 2 Miles: State Hwy #: 68	Waterways: Pacific				
Airports: None	Railways: None	Sch	ools: Robert L. Stevenson		
Document Type:					
CEQA: X NOP Draft EIR Early Cons Supplement/Subsequent EIF Neg Dec (Prior SCH No.) Mit Neg Dec Other:		NOI Other: EA Draft EIS FONSI	Joint Document Final Document Other:		
Local Action Type: Specific Plan General Plan Update Specific Plan General Plan Amendment Master Plan General Plan Element Planned Unit Developmer Community Plan Site Plan		t sion (Subdivision, etc.)	 Annexation Redevelopment Coastal Permit Other: 		
Development Type:					
Residential: Units <u>1</u> Acres <u>2</u>		ui T			
Office: Sq.ft. Acres Employees Commercial:Sq.ft. Acres Employees	Iranspor	rtation: Type Mineral			
Commercial:Sq.ft. Acres Employees Employees			MW		
Educational:	Waste Tr	reatment: Type	MGD		
Recreational:	Hazardou	us Waste: Type			
Water Facilities: Type MGD	r Facilities: Type MGD Other:				
Project Issues Discussed in Document:					
🗙 Aesthetic/Visual 🗌 Fiscal	Recreation/Pa	ırks	X Vegetation		
Agricultural Land Flood Plain/Flooding	Schools/Universities		Water Quality		
Air Quality Forest Land/Fire Hazard	Septic Systems		Water Supply/Groundwater		
X Archeological/Historical Geologic/Seismic	Sewer Capacity		Wetland/Riparian		
⊠ Biological Resources ☐ Minerals	Soil Erosion/	Compaction/Grading	Growth Inducement		
🗙 Coastal Zone 🗌 Noise	Solid Waste		Land Use		
Drainage/Absorption Population/Housing Balan	ce 🔲 Toxic/Hazardous		Cumulative Effects		
Economic/Jobs Public Services/Facilities	Traffic/Circulation Other:				
Present Land Use/Zoning/General Plan Designation: Low Density Residential, 1 Acre Minimum / LDR/1-D (CZ) Project Description: (please use a separate page if nece 1. Demolition of the existing 4,125-square foot two-story s	essary) single-family reside	ence designed by arc			

removal of the approximately 2,825 square feet of asphalt driveway and concrete patios.

2. Up to approximately 2.165 acres of site preparation, ground disturbance, and grading.

3. Construction of new 11,933-square foot, two-story (over basement), single-family residence designed by Mexican architect Ricardo Legorreta and construction of approximately 1,950 square feet of paved areas.

4. Restoration of the portion of the property that will remain undeveloped (approximately 1.8 acres) to native dune habitat.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

	gencies may recommend State Clearinghouse distribut ave already sent your document to the agency please d					
	Air Resources Board	Х	Office of Historic Preservation			
	Boating & Waterways, Department of		Office of Public School Construction	on		
	California Emergency Management Agency		Parks & Recreation, Department of			
	California Highway Patrol	(Landa)	Pesticide Regulation, Department of			
Contraction in the second s	Caltrans District #		Public Utilities Commission			
	Caltrans Division of Aeronautics	And and the other days of the	Regional WQCB #			
	Caltrans Planning		Resources Agency			
	Central Valley Flood Protection Board		D D 1 1D	. Department of		
Contractory of Contra	Coachella Valley Mtns. Conservancy		S.F. Bay Conservation & Developm			
N	Coastal Commission	-	San Gabriel & Lower L.A. Rivers &			
	Colorado River Board			,		
	Conservation, Department of		Santa Monica Mtns. Conservancy			
	Corrections, Department of		State Lands Commission			
1	Delta Protection Commission		SWRCB: Clean Water Grants			
	Education, Department of		SWRCB: Water Quality			
College	Energy Commission		SWRCB: Water Rights			
	Fish & Game Region #	Tahoe Regional Planning Agency				
	Food & Agriculture, Department of	Toxic Substances Control, Department of				
	Forestry and Fire Protection, Department of		Water Resources, Department of			
	General Services, Department of		an here an			
	Health Services, Department of		Other:			
	Housing & Community Development		Other:			
	Native American Heritage Commission	-	a areas			
Local P	ublic Review Period (to be filled in by lead agency)					
Starting Date February 18, 2015 Ending Date March 20, 2015						
Lead Agency (Complete if applicable):						
Consulting Firm: Applicant: Massy Mehdipour						
Address: Address: 111 Independence Drive						
City/State/Zip: City/State/Zip: Menio Park, CA 94025						
Contact:		Phone:	(650) 380-3187			
Phone: _						
Signatu	re of Lead Agency Representative:		(///)	Date: 02/13/2015		
Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.						

MONTEREY COUNTY RESOURCE MANAGEMENT AGENCY

Planning Department Mike Novo, AICP, Director of Planning



168 West Alisal Street, 2nd Floor Salinas, CA 93901 (831) 755-5025 Fax: (831) 757-9516 www.co.monterey.ca.us/rma

NOTICE OF PREPARATION

STEPHEN L. VAGNINI MONTEREY COUNTY CLERK

7 2015

TO: Responsible Agencies/Interested Parties

SUBJECT: Notice of Preparation of an Environmental Impact Report for the Signal Hill LLC Single-Family Residence. Planning File Number: PLN100338

The County of Monterey (County) will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the Combined Development Permit application for development of the <u>Signal Hill LLC Residence located at 1170 Signal Hill Road, Pebble Beach (Planning File Number: PLN100338)</u>. The Project is proposed by Signal Hill LLC and includes the demolition of an existing single-family residence designed by architect Richard Neutra and listed in the California Register of Historical Resources; the construction of a new single-family residence designed by Mexican architect Ricardo Legorreta; and associated site improvements. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed Project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the Project.

The Project description, location, and the potential environmental effects are contained in the attached materials. Per California Environmental Quality Act (CEQA) Guidelines Section 15060(d), an Initial Study was not prepared prior to the decision to prepare an EIR. Due to time limits mandated by state law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice between February 18, 2015 and March 20, 2015.

The County will also hold a public scoping meeting to receive input for the EIR. Your agency is welcome to send a representative to the scoping meeting. The scoping meeting will be held on Monday, February 23, 2015, at 6:00 PM at the Pebble Beach Community Services District Office, located at 3101 Forest Lake Road, Pebble Beach, California, 93953.

Please submit your response to the address shown above. We will need the name for a contact person in your agency.

Sincerely,



Luis A. Osorio, Senior Planner (831) 755-5177; <u>osoriol@co.monterey.ca.us</u> Attachments: Project Location and Description; Potential Environmental Effects Vicinity Map

Cc:

State Clearinghouse, Office of Planning and Research 1400 Tenth Street, Room 212 PO Box 3044 Sacramento, CA 95812-3044

PROJECT LOCATION:

The Project site is located at 1170 Signal Hill Road (Assessor's Parcel Number [APN] 008-261-007-000), within the Spyglass Cypress Planning Area of the Del Monte Forest Land Use Plan, in the unincorporated community of Pebble Beach, Monterey County, California. The 2.165-acre site is located approximately 350 feet southeast of the intersection of 17-Mile Drive and Signal Hill Road.

PROJECT DESCRIPTION

The 2.165-acre site is located within an existing residential neighborhood. The site is located above 17-Mile Drive, in the vicinity of the Cypress Point Golf Course, overlooking the Pacific Ocean. The site contains a single-family residence designed by eminent southern California architect Richard Neutra for Arthur L. Connell and built in 1957-1958. The residence embodies the characteristics of postwar American International Style architecture. The residence was found eligible for listing on the National Register of Historic Places (NRHP) by the California State Historic Preservation Officer on June 13, 2014 and has been listed in the California Register of Historic Places.

The Project site slopes downward from east to west, with the existing residence located at the upper end of the parcel near Signal Hill Road. The Project site is located on a remnant native sand dune on Signal Hill in Pebble Beach. The sand dune is classified as an environmentally sensitive habitat area and is protected by the policies of the Del Monte Forest Area Land Use Plan. The Cypress Point Golf Course is located to the south and southwest, and 17-Mile Drive and the Pacific Ocean are located to the west and southwest. Undeveloped dune habitat is located to the east and across Signal Hill Road.

The area of the Richard Neutra house includes the original 3,299-square foot, two-story, woodframe residence, integral three-car garage, and small studio addition at the southwest corner of the upper level (added in 1993). The total area of the house is 4,125 square feet. The development on the site also includes approximately 2,825 square feet of asphalt driveway and concrete patios. The Project would include the following components:

- 1. Demolition of the existing 4,125-square foot two-story single-family residence designed by architect Richard Neutra and removal of the approximately 2,825 square feet of asphalt driveway and concrete patios.
- 2. Up to approximately 2.165 acres of site preparation, ground disturbance, and grading.
- 3. Construction of new 11,933-square foot, two-story (over basement), single-family residence designed by Mexican architect Ricardo Legorreta and construction of approximately 1,950 square feet of paved areas.
- 4. Restoration of the portion of the property that will remain undeveloped (approximately 1.8 acres) to native dune habitat.

The project requires approval of a Combined Development Permit consisting of:

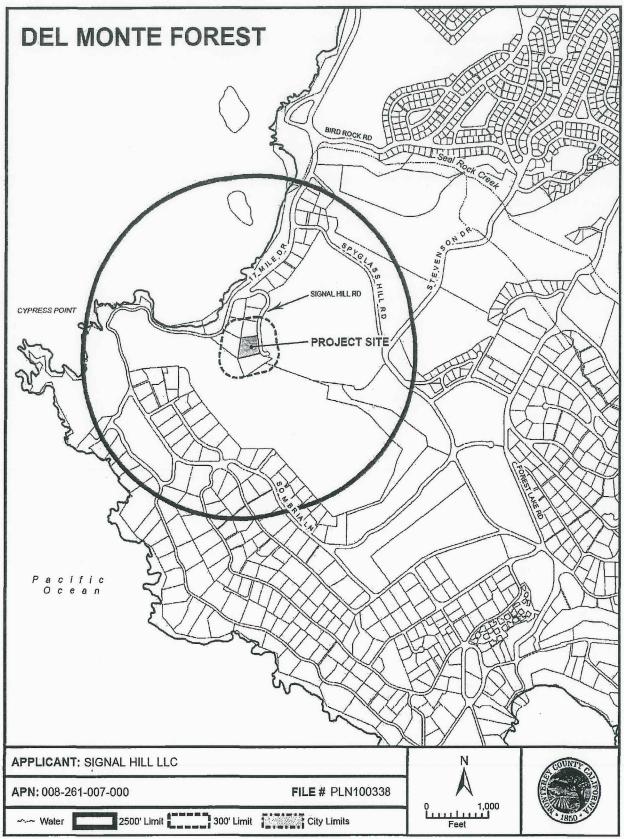
 Coastal Administrative Permit and Design Approval for the demolition of an existing single-family residence listed in the California Register of Historical resources and the construction of a new single-family residence designed by Mexican architect Ricardo Legorreta; and associated site improvements;

- 2) Coastal Development Permit for development within 100 feet of environmentally sensitive habitat and for the restoration of the areas on the site containing native sand dune habitat;
- 3) Coastal Development Permit for development on slopes exceeding 30%; and
- 4) Coastal Development Permit for ridgeline development.

POTENTIAL ENVIRONMENTAL EFFECTS:

The Environmental Impact Report will address potential environmental effects as required by the California Environmental Quality Act (CEQA). The environmental analysis will address short-term (construction) and long-term (operation) impacts, identify feasible mitigation measures, and assess potential alternatives to the Project. The following potential impacts have been initially identified as being potentially significant:

- 1) Impacts from the demolition of a building listed in the California Register of Historical Resources and eligible for listing under the National Register of Historic Places;
- 2) Impacts from development on the native sand dune environmentally sensitive habitat;
- 3) Impacts on views from "public viewing areas" including along 17-Mile Drive;



Vicinity Map

PLN100338 (Signal Hill [Mehdipour]) CEQA Comments regarding Notice of Preparation

Review period of February 18, 2015 through March 20, 2015

- 1. February 23, 2015 unidentified
- 2. February 23, 2015 Jeff Becon (can't read handwriting)
- 3. February 21, 2015 June Duran Stock
- 4. February 25, 2015 George Smart
- 5. February 25, 2015 Dion Neutra
- 6. March 16, 2015 Christine Kantner
- 7. March 16, 2015 Ilse Riebe Colby
- 8. March 17, 2015 Michael Locke
- 9. March 17, 2015 Patricia Leddy
- 10. March 18, 2015 Barbara Lamprecht
- 11. March 18, 2015 Raymond Richard Neutra
- 12. March 18, 2015 Dana Balkin
- March 18, 2015 Sean de Courcy & Carol Roland-Nawi, California Office of Historic Preservation
- 14. March 19, 2015 Katie Butler, California Coastal Commission
- 15. March 19, 2015 Nancy Runyon
- 16. March 19, 2015 Frances & Albert Paley
- 17. March 19, 2015 Karen Lesney
- 18. March 19, 2015 Mark Edwin Norris
- 19. March 20, 2015 Anthony Lombardo

Comments



Impact to Historic Resources

- Connell House itself
- Historic Landscape of 17 Mile Drive
- "Del Monte Forest's cultural resources shall be maintained, preserved and protected for their scientific and cultural heritage values." Del Monte Forest Land Use Plan (June 22, 2012)
- "...where the site is of known regional significance, consideration shall be given to nominating the site to the National Register and preserving it." Ibid.

Impact on Views from 17 Mile Drive

"In reviewing requests for tree removal, land clearing and other development, preservation of scenic resources shall be a primary objective. Because of the regional significance of the forest resources, special consideration shall be given to the ridgeline silhouette, as well as views along Highway 68 and 17-mile Drive, and the view from distant publicly accessible shoreline areas such as found at Point Lobos State Natural Reserve." Ibid.

Impact of development on slopes of 30% or more

"Development on Slopes of 30% or more is prohibited unless such siting better addresses LUP objectives as a whole when compared to other possible siting alternatives on slopes of less than 30% associated with project or sites." Ibid. Hi Mike,



LEFF EDECOM 831-2046110 P.O., 201 534 PRICOFIC GNEVES, CA 12960

Here are my ideas -

Reasonable alternatives to demolition:

1) No Project: The current owner could sell the property to a new owner who could renovate the property in keeping with its historic character.

2) Additions: The property could be renovated with additions in order to both retain the original residence and add substantial square footage. There are many, many architects working today who have been highly influenced by Richard Neutra's work. Many would be delighted to sign on to a project that would save an important Neutra home from demolition, provide a design that would meet the desires of the owner and still meet the Secretary of Interiors Standards for Historic Preservation.

A) Among Neutra's important legacies to architecture and planning was his careful integration of the native landscape into his site and plan development. This is now more difficult to discern because of the current owner's actions to prepare the site for her planned development.

Without permits the current owner damaged the historic site by leveling the environmentally sensitive dunes and by cutting down several large cypress trees that were a landmark along Seventeen Mile Drive. Therefore we request that the EIR plan include replacement of large cypress trees in the original locations as well as full restoration of the native dune habitat and topography. Only with this restoration will the full impact of Neutra's original design be realized.

B) I hope that the EIR and all involved agencies will require

that the current owner repair and maintain the Connell house in an acceptable condition. The current owner has allowed and encouraged the deterioration of the home in an effort to achieve "Demolition Through Neglect". This must stop.

C) The current owner makes the claim that a new house by the late architect Ricardo Legoretta would be preferable to the historic Neutra home. Before his death, even Legoretta said that he regretted his involvement with this project.

As the only existing example of a Neutra home on the Central Coast, it deserves more protection than one of the more common Legoretta homes in this area.



From: Sent: To: Subject: June Duran Stock [morjun@redshift.com] Saturday, February 21, 2015 1:38 PM Osorio, Luis x5177 EIR for Signal Hill residence:PLN100338



I am a resident at 3141 17 Mile Drive (at the corner of Signal Hill Road) and have lived here since 1969. I probably should mention that I am a member of the Pebble Beach Land Use Committee.

My viewpoint is that although the plans for the house are attractive, the house itself will be too large for its site, particularly as it will be viewed directly from the 17 Mile Drive and in conflict with the beautiful coastal scenery. As you probably know, serious efforts have been made to keep or return the lands of adjacent properties to present as near a natural setting as possible. In addition, closely adjacent to this property is the Del Monte Forest Conservancy property which was purchased by them fairly recently in order to to keep that area in its natural condition.

Because of the environmental sensitivity of this property I am happy to see you are planning to conduct an EIR.

I'm very sorry that I can't attend your February 23 meeting.

June Duran Stock



From: Sent: To: Subject: George Smart [george@ncmodernist.org] Wednesday, February 25, 2015 11:45 AM Osorio, Luis x5177 Connell House





February 25, 2015

Mr. Osorio,

I represent the country's largest online archive for Richard Neutra houses. <u>www.ncmodernist.org/neutra.htm</u>.

We support the movement to preserve the Connell House in Pebble Beach. Based on observation of the case and the parties, we believe the owner's negligence to maintain and secure the property is strategic and intentional; if she can eventually show the structure is in no condition to be saved; she wins by default.

That would be a great loss for California. Any architect would be honored to take the Connell footprint and renovate it faithfully to its original brilliance. Neutra houses are easily added onto, so the owner could have the larger house she wants, and the Monterey Peninsula could retains one of its crown jewels of residential architecture. That would be a win for all concerned.

Unfortunately, the owner has the upper hand. She can wait this out and the house will pretty much destroy itself. I do not know what you can do to change the balance of power, but I encourage you and the writers of the EIR to do so.

Sincerely,

George

George Smart, Executive Director North Carolina Modernist Houses, the website for Triangle Modernist Archive, Inc. A North Carolina 501C3 Nonprofit Educational Archive Documenting, Preserving, and Promoting Modernist Residential Architecture

5409 Pelham Road / Durham NC / 27713 / USA 919.740.8407 phone / 919.400.4255 fax www.ncmodernist.org / george@ncmodernist.org @NCMHtweets

From: Sent: To: Subject: Dion Neutra [Dion@neutra.org] Wednesday, February 25, 2015 8:14 PM Osorio, Luis x5177 02-25-2015 The Neutra Connell House; a Plea! Luis Osorio d

02-25-2015

Luis A. Osorio, Senior Planner Monterey County Resource Management Agency Planning Department, Salinas



Dear Luis:

The plight of the only relatively intact local Neutra design for hundreds of miles, give me pause.

The total loss of an architectural treasure through demolition? The scarring of an environmentally sensitive dunes landscape? The premature and illegal cutting of huge cypress trees to make way for the proposed mcmansion? The impact on historic views to and from the 17 Mile Drive?

These are only a few of the issues that come to mind in this situation.

And by the look of it, the wealthy owner intends to 'wait out' the arduous EIR process, until all the hoops have been jumped through and everyone's coffers have been emptied. Think what this amount of money could do to restore this icon?

While all this is on-going, somehow the system seems to allow 'a death of a thousand cuts'; the degradation of this lovely house, which was in pretty good condition when I put together the spreads on it, in my book "The Neutras, Then & Later" starting on P. 73. You should really see this!

Http://www.amazon.com/gp/offer-listing/8493848271/ref=dp_olp_new?ie=UTF8&condition=new

In this volume I also address the State of Preservation in the US (P. 149-50), where we see how toothless our system is to actually *PRESERVE* these priceless and irreplaceable examples.

Here is a case in point; we place these treasures on 'lists' at great expense. Everyone nashes their teeth, we go thru CEQA and EIR processes that cost upwards of 200K and takes a year. Should it be that difficult to actually *SAVE* this icon?

For what it's worth, *this is the original architects practice*, which stands ready to assist in the restoration of this belabored piece should there be a way to arrest the degradation that appears to be on-going in plain sight of authorities. Who better than <u>us</u> to undertake this work, with access to the original plans?

We celebrate our 89th year in practice this year. Of the possibilities, really the only one is for this owner to give up, sell out, and go elsewhere with her McMansion. There must be some wealthy patron out there, who could step up; buy her out and restore this to its original glory without undue augmentations or distortions. It's like preserving a Picasso; you wouldn't suggest destroying it, changing the color scheme, or making undue alternation or additions! Hopefully, at some point, these thoughts might be helpful in the final fate of this, our baby!

Sincerely,

Dion Neutra

Dion Neutra, architect AIA, FISD, Dion Neutra, Inc. aka Richard and Dion Neutra, Architects and Associates 2440 Neutra Place Los Angeles, CA. 90039 Phone/Fax: 323 666 1806 Website: www.neutra.org E-mail: dion@neutra.org

Please copy this email when replying to me to facilitate communication.

CHRISTINE KANTNER

3-16-15

Mr. Luis A. Osorio Senior Planner Monterey County Resource Management Agency Planning Department, Salinas



Dear Mr. Osorio,

I have been following the plight of the Connell House designed by master architect Richard Neutra and I am appalled that such a thing is happening in Monterey County. Here in Los Angeles, it has always been common practice to "bulldoze the past to make room for the new," but in an environment such as Pebble Beach I am shocked and outraged by what is happening.

First of all, the spectacle of 'death by a thousand cuts' that this owner is visiting upon this icon, in plain view of your jurisdiction! Surely there is something you can do before it is entirely too late?

Please deny the demolition permit. I promise you that once the property goes back on the market, a conservator will come along to lovingly restore the Connell House to its former glory. As you know, Dion Neutra, son and partner, who currently presides over the Neutra practice has stated his willingness to assist.

Many in the architectural preservation field nation-wide are following this case closely. Please do not sacrifice the beauty and integrity of your community by allowing this treasure to be demolished.

The building of anything like the proposed "McMansion" at the site will quite certainly be an eyesore for all and a terrible marker for where once stood an architectural gem. This is indeed a CEQA issue and I am sure you are already getting an earful from many others so I will keep this short.

I urge you to put the house on "watch" as from the current actions of the homeowner, the next thing could actually be an illegal demolition in the near future.

Many thanks for your time,

the 121

Christine Kantner Silver Lake Neighborhood Council Representative Member, Los Angeles Conservancy 3924 W. Sunset Blvd. • Los Angeles, CA 90029 • 323.804.6885 • christinekanter@mac.com

From: Sent: To: Subject: Ilse R. Colby [ilseriebe@gmail.com] Monday, March 16, 2015 10:33 PM Osorio, Luis x5177 In favor of the preservation of Richard Neutra's CONNELL HOUSE!!

Dear Luis A. Osorio,

I am writing in support of Neutra's significant and meaningful construction of the Connell House on the Monterey Penninsula. As a long time local who grew up on the Penninsula, I have long admired and appreciated the Connell House and the significance it holds both in Monterey and California as a whole. I believe strongly in the preservation of historically meaningful institutions, and I feel equally strongly that Neutra's work is one of them.

Thank you sincerely for your time and I very much hope that the right decision will be made for the Connell House.

Best, Ilse Riebe Colby



From: Sent: To: Subject: Michael J Locke [mjlocke@pacbell.net] Tuesday, March 17, 2015 7:34 AM Osorio, Luis x5177 Save the Connell House!

Luis A. Osorio, Senior Planner Monterey County Resource Management Agency Planning Department 168 West Alisal Street, 2nd Floor Salinas, CA 93901



As Senior Planner for the Monterey County Resource Management Agency, I urge you to do everything within your power to stop the demolition of the Richard Neutra-designed Connell House. To allow the destruction of this architectural treasure in your midst would be deemed by preservationists as an act of outright civic irresponsibility.

I urge you to do the right thing. Sincerely yours,

Michael Locke Editor, The Silver Lake News Author, Silver Lake Chronicles, Exploring an Urban Oasis in Los Angeles Member, Los Angeles Conservancy

From: Sent: To: Subject: Patricia Leddy [patricia.leddy@sbcglobal.net] Tuesday, March 17, 2015 8:43 AM Osorio, Luis x5177 Neutra's 1958 Connell House

Dear Luis A. Osorio, Senior Planner:

It has been brought to my attention the destruction of the Connell House.

I live in a Neutra House, built the same period of time. Just this past week over 50 young architects visited my place, along with David Coffey's Neutra home built during the 30's.



So, perhaps the Connell House needs repair like most houses. I'm constantly repairing something, old rusty pipes, termite eaten wood. landscaping, old trees tend to need pruning...like us humans...we need repair now and then. Soooo, save the Connell House.

Thank you, Patricia Stockton Leddy.

From: Sent: To: Subject: lamprecht barbara [bmlamprecht@gmail.com] Wednesday, March 18, 2015 9:45 AM Osorio, Luis x5177 Connell House

18 March 2015

Luis A. Osorio, Senior Planner Monterey County Resource Management Agency Planning Department 168 West Alisal Street, 2nd Floor Salinas, CA 93901



Dear Mr. Osorio,

Since I co-wrote the nomination for the Connell House, I shall not repeat myself but wish to make one important point.

For those of us who are actively involved in the rehabilitation of historic properties, especially in Neutra houses as I and others are, the condition of the Connell House is in no way so deteriorated as to prevent its full rehabilitation. In fact, compared to many other houses designed by Richard Neutra; R.M. Schindler; and a host of the twentieth century's other major architects, the Connell House appears to have far fewer challenges than others which have looked far worse and which posed significant structural problems but that yet met with successful outcomes.

Many would relish such an opportunity because overall the house appears to be structurally sound, although investigation of course would need to be performed for accurate evaluations. Finishes and their substrates can be repaired or replaced.

What may appear to be dismaying and overwhelming to the uninitiated in rehabilitation is standard issue and even less so to those with experience and with eyes that see the surface and beyond. Many, as well, would welcoming the creative challenge of methodically and wisely applying the Secretary of the Interior's Standards for Rehabilitation to this superbly sited and handsome house.

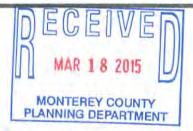
Best regards,

Barbara Lamprecht, M.Arch.

barbara lamprecht, m. arch. 550 e. jackson st. pasadena ca 91104-3621

Lamprecht ArchiTEXTural website: barbaralamprecht.com e-mail: bmlamprecht@gmail.com skype: b.lamprecht mobile 626 264 7600

From: Sent: To: Subject: Raymond Neutra [raymondneutra@gmail.com] Wednesday, March 18, 2015 10:55 AM Osorio, Luis x5177; Sally Aberg Connell House



Dear Mr. Osorio,

I am writing you about the EIR process regarding the Connell house in Pebble Beach. I write both as the son of its architect, Richard Neutra who remembers seeing the house under construction and as a former state official in charge of a large Environmental Health division of the California Department of Public Health.

I am troubled that County of Monterey elected officials as well as responsible civil servants have allowed the current owner to flout her duties to safeguard this historically significant building and its surrounding vegetation in hopes that its deterioration will strengthen her case that is should be razed. Those of us who have made a career of public service have a duty to scrupulously see that the rules are followed. If we don't we can expect a public outcry. I urge Monterey to be exemplary in this contentious matter.

Sincerely yours

Raymond Richard Neutra MD Dr.PH

From: Sent: To: Subject: dana balkin [dana@resourcela.com] Wednesday, March 18, 2015 3:34 PM Osorio, Luis x5177 The Connell House

Dear Mr. Osorio,



I wanted to take a moment to voice my opinion in regards to the discussion of the Connell House designed by master architect Richard Neutra. I am outraged that such a thing is happening in Monterey County. The Connell House is a rare opportunity of this type of architecture and it should be preserved. It fits flawlessly into the landscape and should remain a part of Pebble Beach. Please deny the demolition permit.

Thank you,

Dana Balkin

--

Dana Balkin Resource t: 323 663 0500 m: 323 627 6077 e: <u>dana@resourcela.com</u> | w: <u>resourcela.com</u>

PAY ATTENTION PAY ATTENTION PAY ATTENTION PAY ATTENTION PAY ATTENTION PAY ATTENTION

From: Sent: To: Cc: Subject: Attachments: deCourcy, Sean@Parks [Sean.deCourcy@parks.ca.gov] Wednesday, March 18, 2015 1:11 PM Osorio, Luis x5177 Clovis, Meg x4913; Woodward, Lucinda@Parks NOP Signal Hill LLC Single-Family Residence Signal Hill Demolition Project - OHP Comments.pdf



Mr. Osorio,

Thank you for including the California Office of Historic Preservation (OHP) in the environmental review process for the proposed Signal Hill LLC Single-Family Residence (proposed project). Please see the attached comment letter in response to the Notice of Preparation of and Environmental Impact Report. We have also sent a hard copy via U.S. mail.

If you have any questions, please feel free to contact me directly.

Sean de Courcy State Historian II Local Government & Environmental Compliance Unit California Office of Historic Preservation (916) 445-7042 (916) 445-7053 fax Sean.deCourcy@parks.ca.gov STATE OF CALIFORNIA - THE NATURAL RESOURCES AGENCY

EDMUND G. BROWN, JR., Governor

OFFICE OF HISTORIC PRESERVATION DEPARTMENT OF PARKS AND RECREATION

1725 23rd Street, Suite 100 SACRAMENTO, CA 95816-7100 (916) 445-7000 Fax; (916) 445-7053 calshpo@parks.ca.gov www.ohp.parks.ca.gov



March 18, 2015

Luis A. Osorio Senior Planner Monterey County Planning Department 168 West Alisal Street, 2nd Floor Salinas, CA 93901

Dear Mr. Osorio,

RE: NOTICE OF PREPARATION OF AN ENVIRONEMNTAL IMPACT REPORT FOR THE SIGNAL HILL LLC SINGLE-FAMILY RESIDENCE

Thank you for including the California Office of Historic Preservation (OHP) in the environmental review process for the proposed Signal Hill LLC Single-Family Residence Project (proposed project). Pursuant to the National Historic Preservation Act and the California Public Resources Code, the State Historic Preservation Officer (SHPO) and the OHP have a broad responsibility for the implementation of federal and state historic preservation programs in California. We have a long history working with the County of Monterey (Lead Agency) through our Certified Local Government Program. Our comments are offered with the intent of protecting historic and cultural resources, while allowing the County of Monterey to meet its program needs. The following comments are based on the information included in the Notice of Preparation of an Environmental Impact Report for the proposed project.

The proposed project site is a 2.1-acre residential parcel located above 17-Mile Drive, near the Cypress Point Golf Course. The proposed project will demolish the existing 3,299-square foot residential building, garage, and driveway that currently occupy the site, and construct a new 11,933-square foot single-family residential building and install 1,950-square feet of new hardscape. The existing building was originally designed by the eminent southern California architect Richard Neutra for the Connell family, and the residence was listed on the California Register of Historical Resources and formally determined eligible for listing on the National Register of Historic Places in 2014.

The National Register Nomination prepared for the 1170 Signal Hill Road (Connell House) in 2014 included this description of the residence:

[T]he Connell House is unequivocally an important example of the International Style, perfectly illustrating this design aesthetic within the context of the development of Modern architecture in Pebble Beach. Despite a small addition and various minor reversible alterations to some of the fenestration, it retains a high degree of historic integrity. Luis A. Osorio March 18, 2015 Page 2 of 3



A historic resource for the purposes of CEQA is defined as "[a] resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources." 1170 Signal Hill Road was listed in the California Register and formally determined eligible for listing in the National Register in 2014; therefore, the historic significance of the building is not in question.

A project will have a significant environmental impact if it causes a substantial adverse change to a historical resource (see CEQA Guidelines § 15064.5 (b)). A substantial adverse change includes demolishing or materially altering in an adverse manner those physical characteristics of a historical resource, that justify its eligibility for listing in the California Register. Demolition of 1170 Signal Hill Road is a significant impact to a historical resource that cannot be mitigated to a less than significant level.

Pursuant to CEQA Guidelines § 15126.6 the EIR should focus on a range of project alternatives that have the potential to lessen the significant environmental impacts of the proposed project. The alternatives discussed in the EIR should be capable of avoiding or substantially lessening the impact of demolition, even if the alternative would impede the project objectives or be more expensive than the proposed project (CEQA Guidelines § 15126.6(b)). Some alternatives to consider that have the potential to significantly reduce the impacts of demolition are 1) the no project alternative, 2) alternative site alternative, 3) adaptive reuse alternative, and 3) the rehabilitation and new construction on-site alternative. These should all receive adequate evaluation in the DEIR and include enough information for the Lead Agency to consider adopting the environmentally superior alternative.

Mitigation measures may help reduce the project's impacts on historical resources, but the impact of demolition will still be significant. Only by exploring alternatives to demolition can the Lead Agency reduce the impact of the proposed project to a level that is less than significant.

We highly recommend the Lead Agency consider a project alternative that retains the historic property, and rehabilitates the building following *The Secretary of the Interior's Standards for the Treatment of Historic Properties* (Kay D. Weeks and Anne E. Grimmer, U. S. Dept. of the Interior, 1995). This would be in keeping with the spirit and intent of the County's General Plan which encourages historic preservation (Historic Resources Element), and the County's historic preservation program, which has been reviewed and certified by the National Parks Service as a Certified Local Government historic preservation program.

The project will require grading and other ground disturbances as the result of construction activities; impacts to potential prehistoric and historic archeological resources should be anticipated and identified. We recommend that a research design and study, which may include some testing, be prepared as part of the DEIR so that if potential sites are identified they can be addressed before construction occurs. In addition, we recommend that the Lead Agency contact the Native American Heritage Commission, and any tribes with known ties to the project area, to determine if any

Luis A. Osorio March 18, 2015 Page 3 of 3



known sacred sites are located in or near the project area, and also to identify most likely descendants in the event that cultural materials are encountered.

If the historic resource (existing residence) is demolished, the Lead Agency will be required to adopt a statement of overriding consideration. However, this statement does not alleviate the Lead Agency from the responsibility to adopt formidable mitigation measures that will lessen the environmental impact of demolition. Pursuant to CEQA Guidelines § 15126.4 (b)(1-2) in some circumstances recording a resource may reduce the impact of demolition to a less than significant level. For instance, recordation may suffice if the proposed project requires partial demolition of a secondary facade; however, when the proposed project calls for complete demolition, recordation will not reduce the impact to a less than significant level.

We recommend the Lead Agency consider adopting mitigation measures that have a public benefit component. Some mitigation measures to consider may include sponsoring surveys of similar resource types in other areas of the County, or repairs to similar resource types that are in-need of stabilization or restoration. As a condition to the proposed project, any mitigation measures should be fully funded and enforceable through a mitigation monitoring and reporting plan prior to the issuance of a demolition permit.

If you have questions, please contact Sean de Courcy of the Local Government and Environmental Compliance Unit, at (916) 445-7042 or at <u>Sean.deCourcy@parks.ca.gov</u>.

Sincerely,

Ceul Tokand Mais, Ph.D.

Carol Roland-Nawi, Ph.D. State Historic Preservation Officer

EDMUND G. BROWN JR., GOVERNOR

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE 725 FRONT STREET, SUITE 300 SANTA CRUZ, CA 95060 PHONE: (831) 427-4863 FAX: (831) 427-4877 WEB: WWW.COASTAL.CA.GOV



March 19, 2015

Luis Osorio Senior Planner Monterey County Resource Management Agency – Planning Department 168 W. Alisal Street, 2nd Floor Salinas, CA 93901

Subject: Notice of Preparation for the Signal Hill LLC Single Family Residence (PLN100338) Draft Environmental Impact Report (SCH # 2015021054)

Dear Mr. Osorio:

IL IL I

Thank you for sending the Notice of Preparation (NOP) of a draft Environmental Impact Report (EIR) for the Signal Hill LLC residence (PLN100338) for our review. The proposed project involves demolition of a historic 4,125-square foot two-story single family residence and construction of a new 11,933-square foot two-story single family residence on a 2.165-acre site in the Signal Hill dunes area of the Del Monte Forest. Coastal Commission staff has provided comments to the County in the past on the coastal development permit (CDP) application for the project. The project site is within the County's CDP jurisdiction and within the Coastal Commission's CDP appeal jurisdiction (because the site is located between the first public road (Highway 1) and the sea). We would like to provide the following comments for consideration in the EIR analysis.

The NOP identifies impacts from development on the native dune habitat (considered to be environmentally sensitive habitat area, or ESHA) as potentially significant. The EIR should clearly identify and evaluate which portions of the site are ESHA. In general, the project is located within the southern extent of the Asilomar Dunes complex, and all undeveloped areas of the site are considered dune habitat, particularly if dune sand and native dune plants are present. The EIR should identify coverage amounts for existing paving and structural coverage and new paving and structural coverage, and identify how much new coverage (paving and structural) is proposed in undeveloped dune areas of the site.

The guiding land use policies and standards for development of the site are located in the Monterey County LCP (Del Monte Forest Land Use Plan (LUP), Del Monte Forest Implementation Plan, and Title 20). The thresholds of significance should include consistency with applicable policies and regulations, including the LCP. Applicable policies include LUP Policy 8, which states that "new land uses within ESHA shall be limited to those which are dependent on the resources therein" and "development should be sited and designed to prevent impacts that would significantly degrade the protected habitat." Policies specific to dune ESHA include LUP Policy 17, which states that "remnant native sand dune habitat...on Signal Hill...shall be preserved through scenic and conservation easement...," and LUP Policy 18,

Luis Osorio Monterey County RMA – Planning Department March 19, 2015 Page 2



which states that "uses of the remnant native sand dune habitat shall be limited to low-intensity scientific, educational, or recreational activities dependent on the resource..." In general, the Coastal Commission views new non-resource dependent development in ESHA to be inconsistent with these policies. The EIR should evaluate the project's footprint against these policies to determine significance.

The NOP also identifies impacts from the proposed development on views as potentially significant. Like with ESHA, the EIR should treat consistency with applicable land use policies and regulations as a significance threshold for visual resources. The site is highly visible from 17 Mile Drive and public vantage points along the shoreline in the vicinity of Fan Shell Beach, and is located in an identified view area from 17 Mile Drive on the LUP Visual Resources map (Figure 3). The scenic and visual resources policy guidance statement of the LUP states that it is the objective of the plan to "protect the area's magnificent scenic and visual resources, to avoid incompatible development, and to encourage improvements and facilities which complement the natural scenic assets..." Among other things, LCP policies require that "Views from...17 Mile Drive corridor, and of ridgelines as seen from the public viewing areas identified on Figure 3 shall be protected as resources of public importance, and development that could adversely impact such views shall only be allowed where it protects, preserves, and if feasible enhances, such scenic resources" (LUP Policy 47). The EIR should evaluate the proposed project design, siting, size, bulk and massing against these policies to determine significance.

Finally, the Alternatives analysis in the EIR should include an alternative that results in full consistency with all LCP requirements, particularly for ESHA and visual resources.

Thank you for the opportunity to provide comments on the NOP for this EIR. If you have any questions or would like to discuss the project or these comments, please feel free to contact me at (831) 427-4863 or <u>katie.butler@coastal.ca.gov</u>.

Regards,

Katie Butler Coastal Planner Central Coast District Office

cc: State Clearinghouse

From: Sent: To: Subject: Attachments: Nancy Runyon [nrunyon@sbcglobal.net] Thursday, March 19, 2015 10:02 AM Osorio, Luis x5177 Save the Connell House Itr Osorio 3.19.15.docx



Luis A. Osorio, Senior Planner Monterey County Resource Management Agency Planning Department 168 West Alisal Street, 2nd Floor Salinas, CA 93901

Dear Mr. Osorio,

It is distressing to hear that our historic and architectural gems, such as the Connell House in Pebble Beach are not respected and appreciated. It is so unfortunate when they are purchased by someone who disregards their significance.

Please do not allow someone, just because they are wealthy, to disregard the laws that protect all the citizens of California. We see this insensitivity and greed way too often. Allowing the owner of the Connell House to demolish or create "demolition by neglect" of an important resource will be a crime against the people of California and set a very bad precedent for continuing these crimes in the future.

Please do whatever possible to uphold the laws of CEQA and NEPA and preserve this asset.

Thank you,

Nancy Runyon

Nancy Runyon nancy@nancyrunyon.com www.nancyrunyon.com 1195 Hoffman Avenue Monterey, CA 93940 USA (831) 649-8132 home/office (831) 915-4546 mobile Nancy Runyon 1195 Hoffman Avenue Monterey, CA 93940

March 19, 2015



Luis A. Osorio, Senior Planner Monterey County Resource Management Agency Planning Department 168 West Alisal Street, 2nd Floor Salinas, CA 93901

Dear Mr. Osorio,

It is distressing to hear that our historic and architectural gems, such as the Connell House in Pebble Beach are not respected and appreciated. It is so unfortunate when they are purchased by someone who disregards their significance.

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Please do whatever possible to uphold the laws of CEQA and NEPA and preserve this asset.

Thank you,

Nancy Runyon

Nancy Runyon

From: Sent: To: Subject: Frances Paley [francespaley@yahoo.com] Thursday, March 19, 2015 6:39 PM Osorio, Luis x5177 Neutra House

FRANCES & ALBERT PALEY

MONTEREY COUNTY PLANNING DEPARTMENT

11 Prince Street Rochester, New York 14607

26180 Valley View Avenue Carmel, CA 93923

> 585-490-3676 585-750-7898 831-624-1586

March 19, 2015

Dear Mr. Osorio:

My husband and I are writing with reference to the EIR process regarding the Connell house in Pebble Beach.

We are writing as residents of Carmel and Rochester, New York, where for 40 years we have had the privilege of devoting time to preservation and community matters.

In Rochester, New York we engaged in a 10 year rehabilitation of one of the most historic properties in the city. It is a 3 story, 9,000 sq.ft. carriage house built by a founder of Western Union on his family estate. This property was derelict and in disrepair and is now a showpiece for the future. It is on many historical and cultural tours for visitors to the City and Rochesterians as well.

We are not wealthy, we did this while working full time and committing to the project to its completion.

In addition, in Rochester, I have been working with Preservation and Landmark Associations as well as various neighborhood groups for 35 years to try to insure the safety and future of other properties, many of which would have been torn down in those years. I can say I am proud that many homes are still standing and in good repair due to these efforts. They are seen as the "gems" that were handed down from the turn of the 20th Century. In Carmel, we purchased a property that, although not Landmark status, has a history of an important owner who was aware of our historical preservation efforts in Rochester. Due to this fact, we were able to purchase it at an affordable price on the promise that we would not tear it down. In fact, even though we found it was unstable due to termite issues over the years, we rebuilt it exactly as it was as we had promised them. It was an expensive promise to keep, as naturally, it would have been simpler to tear it down and do something else or sell the property and just move on.

If one is privileged to own and live in an historic property, there is an unwritten contract that calls for respect and care for preservation. It is not simply some house that can be treated casually. To do so is arrogant and reflects a complete lack of respect.

The owner of the Connell home must be stopped from razing a Neutra house. Neutra is one of the most esteemed architects who designed historically important buildings. Any community should count itself lucky to have one of his homes.

Please, consider the importance of this house and do what is right to protect it. Sadly, it is only after losing something of this quality that regret sets in and then it is too late. Although not a large home by Pebble Beach standards, it is an important home and cultural landmark and icon. Without it Pebble Beach would be gravely diminished.

Very truly yours,

Frances Paley

Past Faculty Member and Administrator College of Imaging Arts and Sciences Rochester Institute of Technology Rochester, New York

Owner Paley Studios Rochester, New York

Albert Paley

Endowed Chair, College of Imaging Arts and Sciences Rochester Institute of Technology Rochester, New York

Owner Paley Studios Rochester New York

From: Sent: To: Subject: Attachments: karen lesney [kelesney@sbcglobal.net] Thursday, March 19, 2015 11:14 PM Osorio, Luis x5177 connel house support 2015 mbm_Neutra ltr EIR_kelesney.pdf

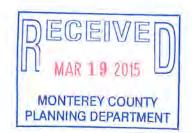


mr osorio please find attached letter of support for saving the connell house. thank you karen

karen e LESNEY : assoc aia : 831.424.2551

mbm : monterey bay modernism Think before you print.





March 19, 2015

Luis A. Osorio, Senior Planner Monterey County Resource Management Agency Planning Department

168 West Alisal Street, 2nd Floor Salinas, CA 93901

Re: Connell House 1170 Signal Hill Road, Pebble Beach PLN100338

Dear Mr. Osorio,

Having been at the forefront of the community of local architectural curators of Monterey modernism who lead a global petition to 'Save The Connell House' by 20th Century Modern Master Architect Richard Neutra, I find it now troubling to discover that disregard of a now historically significant residence happening on many levels.

It is not too late to reverse what has seemingly become the blind allowance of property mismanagement via disregard of the home's historic building envelope and environmental scarring.

A perceived neglect by the Owner and lack of oversight/manpower by the County should not give cause to permit its demolition. These areas of the home were well within rehabilitation and/or restoration at the beginning of our concerns – and remains as such. It should also be noted that it still possesses the rightful protection of its CEQA statutes.

Let not the dialogue that has pushed back our efforts be the power that pushes the pen to deem this property beyond repair. It still remains a significant historic mid-century building.

The county, community and country deserve to have this architectural landmark home as part of its continuing heritage. Thus, the preservation of this home is vital in providing both a litmus by which our local residents can look to the county as an ally in protecting our natural and manmade resources.

Sincerely,

karen e Lesney : asso aia : 831.4242551 mbm: monterey bay modernism founder

on behalf of: local curators of mbm : monterey bay modernism

www.monterybaymodernism.blogspot.com

From: Sent: To: Cc: Subject: Norrisdesignsetc@aol.com Thursday, March 19, 2015 2:14 PM Osorio, Luis x5177 norrisdesignsetc@aol.com Connell House by Neurtra, one more in support of it's preservation

Luis,

Please add my name to the list of those supporting strong County enforcement of CEQA and the County's requirement for owners' maintenance of registered historic properties in County jurisdiction, in particular the Connell House by Neutra in Pebble Beach.

Such structures enrich our culture and their preservation shows great respect for their artistry and our posterity.

With the Mills Act available, she could have a fine and relatively inexpensive property. It could be a gem.

But that notwithstanding, | hope the current owner can recoup her costs, but | think she needs to sell. Given the poor stewardship she's shown and the unpermitted tree removal and grading, she obviously doesn't respect the property, County regulations, or the community.

Sincerely, Mark Edwin Norris, Designer and Permit Expediter (831) 424-2114

www.NorrisDesignsEtc@aol.com http://www.facebook.com/pages/Norris-Designs-Etc/334065919973307 http://www.linkedin.com/pub/mark-edwin-norris/33/4a8/5b2

please consider the environment before printing this email this office does not necessarily endorse whatever appears below this line.



From: Sent: To: Cc: Subject: Attachments: Gina Pompey [gina@alombardolaw.com] Friday, March 20, 2015 12:13 PM Novo, Mike x5192 Osorio, Luis x5177; sam@ptllc.com Mehdipour/Signal Hill LLC (PLN100338) L-Novo 3.20.15.pdf



Mr. Novo:

Attached please find a letter from Mr. Lombardo regarding the above-referenced matter.

Thank you.

Gina Pompey Assistant to Anthony L. Lombardo ANTHONY LOMBARDO & ASSOCIATES A Professional Corporation 450 Lincoln Avenue, Suite 101 Salinas, CA 93901 Phone (831) 751-2330 Fax (831) 751-2331 Email gina@alombardolaw.com

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ANTHONY LOMBARDO & ASSOCIATES

A PROFESSIONAL CORPORATION

ANTHONY L. LOMBARDO Kelly McCarthy Sutherland Debra Gemgnani Tipton 450 LINCOLN AVENUE, SUITE 101 Salinas, CA 93901 (831) 751-2330 Fax (831) 751-2331

March 20, 2015

1599.001

Mr. Mike Novo, Planning Director Monterey County RMA 168 West Alisal, 2nd Floor Salinas, CA 93901

RE: Comments on NOP for Mehdipour/Signal Hill LLC (PLN100338)

Dear Mike:

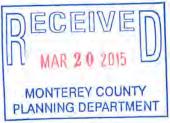
I represent Mr. and Mrs. Sam Reeves the immediate neighbor to the south of the Mehdipour property. As you know, they have raised their concerns with this project on many occasions and now concerned about the NOP's failure adequately describe the project and disclose its potential impacts. Without that disclosure it is impossible for agencies or the public to fully understand the project or to provide meaningful comments on the NOP.

Specifically:

<u>Baseline</u>: The baseline conditions from which the project's significant impacts will be assessed must be clearly described. Under normal circumstances that baseline date would be when the application was determined to be complete (August 13, 2013). However, based on the clear and substantial record of Ms. Mehdipour's violations, starting with tree removal, continuing on the multiple violations of the building codes and obvious efforts to demolish the Connell House by neglect it is our opinion that the baseline date should be November 8, 2010, the date the application was filed. The Connell House, as documented in the County's files, was very livable. Ms, Mehdipour's own statements have been that she and her family used the house. The house was rented to others. There is a March 2012 report from Covell Construction in the County's file identifying what amount to maintenance deficiencies, but the report does not in any way indicate the house was not in a livable condition or had any significant structural defects.

The EIR should disclose that there had been illegal tree removal and disruption of the dune habitat prior to November 2010 and discuss the significance of the disruption of the habitat and loss of mature trees to the Connell House setting. Based on GoogleEarth aerials, timeframe of those violations is April-June, 2009.

The current condition of the house, which is clearly a result of Ms. Mehdipour's failure to maintain the house and property, even after being cited by the County, should not be used as the baseline for the EIR.



Mr. Mike Novo March 20, 2015 Page 2



<u>Historic Significance</u>: The EIR does not need to assess the historical significance of the Connell House. That question has been decided. The Connell House has been determined by the Secretary of the Interior to be eligible for listing on the National Register of Historic Places. The Connell House is listed on the State Register of Historic Places. The EIR does not need to further review or discuss that question.

The EIR should discuss in detail the significant adverse effect of the loss of the Connell House and how, realistically, that impact of that loss cannot be mitigated to an insignificant level. And based on that, the EIR should then focus on what factors, if any, could lead to a finding of overriding considerations.

The EIR should identify alternatives for the Connell House including renovation, rehabilitation and additions which could be accomplished consistent with the Secretary of the Interior's Guideline.

<u>Consistency with the Del Monte Forest Land Use Plan</u>: The California Coastal Commission staff weighed in heavily on this project and its inconsistency with the DMFLUP. While the DMFLUP has been amended since, the Plan did not change in a way as to change or reduce those consistency issues. The EIR's consistency analysis should be significantly guided by the Coastal Commission comments in light of the current DMFLUP.

<u>ESHA</u>: The property is a dune habitat and therefore ESHA pursuant the terms of the past and current DMFLUP. The EIR should recognize that the only available area for development without disruption of ESHA is the area currently covered by buildings, asphalt or concrete. Any expansion of the building area will result in the loss of the ESHA and that impact should be fully analyzed and assessed. That assessment should be done based on the property condition prior to the illegal tree removal and destruction of dune habitat.

The EIR should also discuss the Board of Supervisors' decision to approve a permit for "restoration" and then independently determine if the restoration has been carried out pursuant to the Board's decision. Most importantly the EIR should assess if the work that was done has or can meet the performance criteria of providing a tree canopy to approximate the 2007 tree canopy and provide 50% dune coverage with native species (Board of Supervisors Resolution 13-021).

Neither the NOP nor the project description indicates there will be tree removal. It is therefore assumed there will be no tree removal for this project. The EIR should address if the house as designed can be built without the removal or ultimate loss of the replacement trees or any other trees on the property.

<u>Public Viewshed and Neighborhood Character</u>: The building site is located on a dune in clear view of Seventeen Mile Drive and riding and hiking trails to the east. Residences along Signal Hill are predominantly low, single level designs in the 3-4,000 SF range. The impact of a new

Mr. Mike Novo March 20, 2015 Page 3



three level, 12,000 SF house, which has been identified as being ridgeline development, on the public viewshed from Seventeen Mile Drive, the public trails and on the neighborhood should be fully assessed.

Sincerely, a Anthony L. Lombardo ALL/gp

cc: Mr. Sam Reeves Luis Osorio, Senior Planner