

Attachment A

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Detailed Project Discussion

Mid-Valley Shopping Center Historic Determination

Action before the Board of Supervisors

Pursuant to Section 18.25.090.A of the Monterey County Code, the Board of Supervisors is asked to consider declaring the Mid-Valley Shopping Center an historic resource that is eligible for listing on the Monterey County Register of Historic Resources, and in making a decision regarding historic significance, to certify an Environmental Impact Report (EIR).

According to Monterey County Code, a "Historic resource" means "any structure, object, fence, site, or portion of a site which has a significant historic, archaeological, architectural, engineering or cultural value, real property or improvement thereon such as a structure, archaeological excavation, or object that is unique or significant because of its location, design, setting, materials, workmanship, or aesthetic feeling and is designated as such by the Board of Supervisors pursuant to the provisions of this Chapter." [Section 18.25.030 of the Monterey County Code].

The EIR discusses the environmental impacts of a proposed Design Approval that would allow modifications to the shopping center. The focus of the EIR is on potential impacts of those modifications on a potentially historic resource as defined by the California Environmental Quality Act (CEQA). There are differing opinions amongst historians regarding the qualifications and eligibility of the shopping center as an historic resource. The primary areas of disagreement considered in the EIR are:

- Consideration of Olof Dahlstrand (architect of the Mid-Valley Shopping Center) as a "master architect"; and
- The remaining "integrity" (or ability for the shopping center to convey its historic feeling and association with Dahlstrand) in light of modifications to the shopping center over time.

According to guidance published by the Secretary of the Interior, a historic resource must both qualify for listing and retain integrity to be considered an historic resource.

The action before the Board of Supervisors does not include approval or denial of the Design Approval. The Design Approval will be considered separately following a determination by the Board regarding historic significance.

Background

The Mid-Valley Shopping Center, or Shopping Center provides approximately 68,000 square feet of shops serving Mid-Carmel Valley local shopping needs and regional shopping needs in the greater Carmel Valley area. The Shopping Center is comprised of 5 different buildings or blocks surrounding a central parking area. Each building or "block" is identified in a letter system; Building A, anchored by Safeway, Building B, connected by a breezeway to Building A and containing multiple tenant spaces at the southeast corner of the property; Building C, formerly anchored by the cinema along the eastern side of the property; Building D, currently an Ace Hardware store; and Building E, and auto repair center.

In 2019, some work began at Mid Valley Shopping Center including the installing of Hardie Board on columns and painting the columns and building white (that work primarily affected building C - the building that formerly contained a cinema). A stop work order was issued and the applicant was directed to apply for a Design Approval for the color and material change or restore the site to its pre-

existing condition. On May 8, 2019, the property owner, Russ Stanley representing Mid Valley Partners LLC (applicant), submitted a request for a Design Approval (PLN190140) to allow:

Facade upgrades and site improvements at the Mid Valley Shopping Center including:

- New paint around the window trims and roof fascia;
- Wrapping select aggregate concrete columns in a hardy board material that mimics rough-sawn siding;
- Removal of the “breezeway” or overhead roof element connecting Building A and Building C;
- Removal of portions of the roof at the front of tenant spaces exposing rafters in these areas on Buildings A, B & C to provide better visibility of the tenant spaces;
- Construction of a new dormer with metal roof on Building C;
- New entry roof gable with standing seam metal roof on Building C;
- The roof areas at 6 corners would be removed exposing the fascia and joists and substituting a bronzed aluminum decorative panel. The panels would be attached to the remaining joists and fascia;
- New windows on Building C;
- New rollup doors on Buildings B and A; and
- New exterior paint colors, new wood vertical siding at walls and select columns.

The proposed colors include tans, sage-like greens and blues. Select roof elements would be upgraded to include a standing-seam steel material in a non-reflective silver tone. The project also includes replacement of the portions of the existing landscaping with drought-tolerant landscaping.

As part of the review of that Design Approval, comments were submitted by the Carmel Valley Association (CVA) suggesting that the Mid Valley Shopping Center is an historic resource. In response, the applicant had Dr. Anthony Kirk prepare a Phase I historic assessment of the Shopping Center. Dr. Kirk submitted a letter dated September 18, 2019 finding that the Mid Valley Shopping center does not appear eligible for listing on the National, State, or Local registers. Several reasons were given for his conclusion.

The Carmel Valley Association (CVA) separately hired Page & Turnbull to conduct an assessment of the Mid Valley Shopping Center. Page & Turnbull provided a “Preliminary Opinion of Historic Significance” dated October 29, 2019. Page & Turnbull’s preliminary opinion was that the Mid Valley Shopping Center appears to possess sufficient significance and integrity to be eligible for listing in the California Register under Criterion 3, for its architectural style and association with architect Olof Dahlstrand. Page & Turnbull later provided a Phase 1 Historic Assessment and Primary Records document using the Department of Parks and Recreation (DPR) forms.

Dr. Kirk provided a written rebuttal to the Page & Turnbull Preliminary Opinion dated November 4, 2019, in which he disagreed with the Page & Turnbull conclusion and provides additional details to support his earlier conclusion that the shopping center does not qualify for listing.

Later, the applicant commissioned another opinion from Dr. Laura Jones. Dr. Jones reviewed and summarized the previous reports and letters from Dr. Kirk and Page & Turnbull and provided her own analysis. Dr. Jones found no substantial evidence supporting a determination that the shopping center is eligible for listing as an historic resource and further found that even if it were considered eligible for listing, it lacks integrity and does not convey its original design (agreeing with and support the conclusions of Dr. Kirk).

Due to competing opinions on the matter, the County began the process of preparing an Environmental Impact Report (EIR). The California Environmental Quality Act (CEQA) Guidelines Section 15064(g) directs lead agencies to prepare an EIR (and treat impacts as significant) when there is disagreement among expert opinions that are substantiated by facts.

As part of the EIR preparation, an independent historian was contracted to perform a review and analysis of the Shopping Center, under contract with the County and EMC Planning Group. Diana Painter was given the previous documentation and opinions and asked to form her own opinion on the matter. On December 21, 2020, Painter provided an Historic Resources Evaluation and Phase 1 Assessment; the conclusion, Mid Valley Shopping Center is eligible for listing for its design and association with Olof Dahlstrand and it retains integrity.

Ms. Painter also provided a preliminary analysis of the project's consistency with the Secretary of the Interior Standards for Rehabilitation. She found that the project, as proposed is not consistent with the standards. This conclusion has not been disputed (see discussion later).

The EIR prepared for the project assumes that the shopping center is historic (as required in CEQA and as concluded by the County's independent historian) and finds that the proposed Design Approval will have an adverse impact on defining features of the shopping center as currently proposed. Adverse effects on historic resources are considered significant impacts on the environment. All of the above referenced letters and reports were attached to the Draft EIR and circulated for public comment from November 24, 2021 through January 10, 2022. The Draft EIR and all of the appendices are attached to the staff report as **Attachment D**.

During the public comment period on the Draft EIR, the County received several comments. The comments are attached contained in the Final EIR with responses to those comments and proposed revisions to the text of the EIR. Together the Draft EIR and Final EIR constitute the EIR for the project. Specific comments submitted by the applicant's representative, Anthony Lombardo, contain attachments with additional information that are intended to justify a substantial financial hardship (see discussion below) and provide additional historic information from Dr. Kirk and another historian, Barbra Lamprecht. Ms. Lamprecht provides a review of the other letters and concludes that the shopping center is not significant and does not have integrity. Comment letters were also received by neighbors to the project along Center street. Their concerns are with the appearance and noise at the back of the building occupied by Safeway due to recent removal of vegetative screening that acted as a buffer. The applicant has expressed a willingness to provide for new fencing and/or vegetation to address this concern.

Determining Historical Resource Significance or Eligibility for Listing

Qualified historians disagree on the historic significance of the Mid Valley Shopping Center. There is much that is consider in determining historic significance.

First, Section 15064.5(a) of the CEQA Guidelines states:

For purposes of this section, the term "historical resources" shall include the following:

- (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4850 et seq.).*
- (2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies*

must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4852) including the following:

(A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

(B) Is associated with the lives of persons important in our past;

(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

(D) Has yielded, or may be likely to yield, information important in prehistory or history.

(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

In this case, the Mid Valley Shopping Center is not listed on any register (local, state, or federal) and there has been no official determination of eligibility to date. It should be noted that the property owner does not believe the Mid Valley Shopping Center is an "historic resource" and does not consent to listing the property on any register at this time. Therefore, the determination on "historical significance" lies with the lead agency's determination. Monterey County is the "lead agency" under CEQA in this case and our determination must be "supported by substantial evidence in the record." Generally, a project that qualifies for listing, on the local, state, or national registers is treated as an "historical resource" under CEQA.

California Register:

Public Resources Code section 5020.1(j) contains the State's definition of "Historical resource."¹ Public Resources Code section 5024.1 establishes the California Register of Historical Resources and sets forth criteria and procedures for administration of the Register. The criterion for inclusion on the California Register pursuant to section 5024.1 align with the four criteria quoted in Section 15064.5 of the CEQA Guidelines (see quote above). The only difference is that the criteria are numbered 1 through 4 rather than lettered A through D.

National Register:

¹ "Historical resource" includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California." (PRC Section 5020.1)

The preceding discussion outlines the CEQA definitions and California Register definitions of an “historical resource.” National Register criteria are similar to the California Register criteria but are interpreted at a broader (National) level (rather than statewide importance). National Register Criteria include:

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. *That are associated with events that have made a significant contribution to the broad patterns of our history; or*
 - B. *That are associated with the lives of persons significant in our past; or*
 - C. *That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or*
 - D. *That have yielded, or may be likely to yield, information important in prehistory or history.*
- (Code of Federal Regulations, Title 36, Part 60/National Register Bulletin 15)

The language between the State criterion and National Register criterion are very similar but have some notable and important differences. Criterion C, “the work of a master,” is the primary area where historians disagree. A master is “a figure of recognized greatness” in their field.

Local Register:

Criteria for listing on the Monterey County Register of Historic Resources can be found in Chapter 18.25 of the Monterey County Code. These criteria are interpreted at the local level (i.e. a resource important to Monterey County) rather than the state or national level. The Board of Supervisors is the authority to maintain the local register and to determine eligibility for the local register (not at a state or federal level). The criteria for listing at the local level pursuant to Chapter 18.25 include:

An improvement, natural feature, or site may be designated an historical resource and any area within the County may be designated a historic district if such improvement, natural feature, site, or area meets the criteria for listing on the National Register of Historic Places, the California Register of Historic Resources, or one or more of the following conditions are found to exist:

A. *Historical and Cultural Significance.*

1. *The resource or district proposed for designation is particularly representative of a distinct historical period, type, style, region, or way of life.*
2. *The resource or district proposed for designation is, or contains, a type of building or buildings which was once common but is now rare.*
3. *The resource or district proposed for designation was connected with someone renowned.*
4. *The resource or district proposed for designation is connected with a business or use which was once common but is now rare.*
5. *The resource or district proposed for designation represents the work of a master builder, engineer, designer, artist, or.*
6. *The resource or district proposed for designation is the site of an important historic event or is associated with events that have made a meaningful contribution to the nation, State, or community.*
7. *The resource or district proposed for designation has a high potential of yielding information of archaeological interest.*

B. *Historic, Architectural, and Engineering Significance.*

1. *The resource or district proposed for designation exemplifies a particular architectural style or way of life important to the County.*
2. *The resource or district proposed for designation exemplifies the best remaining architectural type of a community.*
3. *The construction materials or engineering methods used in the resource or district proposed for designation embody elements of outstanding attention to architectural or engineering design, detail, material or craftsmanship.*

C. Community and Geographic Setting.

1. *The proposed resource materially benefits the historic character of the community.*
2. *The unique location or singular physical characteristic of the resource or district proposed for designation represents an established and familiar visual feature of the community, area, or county.*
3. *The district is a geographically definable area, urban or rural possessing a significant concentration or continuity of site, buildings, structures, or objects unified by past events, or aesthetically by plan or physical development.*
4. *The preservation of a resource or resources is essential to the integrity of the district.*
(Section 18.25.070 MCC)

The above-described criteria are the basis from which historians draw conclusions of significance. There are many other factors and subcategories that are considered in reaching a conclusion. Many of those factors are described in the National Register Bulletin 14 (https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf). For instance, historic context must be evaluated, significance categories and criteria must be carefully considered, and integrity must be present.

Points of Disagreement:

Five historians have reviewed the Mid Valley Shopping Center. Three of them have found that the property is not significant and/or lacks integrity and two of them found the property is historically significant and eligible for listing because of its design and association with Olof Dahlstrand, a “master architect” (Criteria C at the State level and Criteria A.5 at the local level).

The main questions that must be decided by the County:

- Is the Shopping Center eligible for listing on the Monterey County Register of Historic Resources and hence considered an Historic Resource?
 - Is Olof Dahlstrand a “master architect,” or “figure of recognized greatness”
 - Is the Mid Valley Shopping Center distinguishable from other works and representative of a particular phase in the development of Dahlstrands career that is tied to the reasons he would qualify for distinction as a figure of recognized greatness?
 - Does the shopping center qualify for reasons other than its association with Dahlstrand?
- If the center does qualify for or more reasons, does it retain “integrity” of the original design?

Olof Dahlstrand (1916-2014):

Olof Dahlstrand was born in Wisconsin. He earned his degree in architecture from Cornell University in 1939, and moved to the San Francisco Bay area in 1948 where he worked as an associate for Fred and Lois Langhorst. He took over the practice when the Langhorsts moved to Europe in 1950 and later worked for Skidmore, Owings & Merrill before establishing his own practice in the Monterey Bay area

in the early 1960s. Dahlstrand's work was inspired by Frank Lloyd Wright and often contained strong horizontal and vertical elements of the Prairie style. Some of his notable projects include the Carmel Plaza Shopping Center in Carmel, the Wells Fargo Building in Carmel, a few single-family residences in the Bay Area, renderings produced in collaboration with John Carl Warnecke for the Del Monte Shopping Center and the John F. Kennedy memorial, design of the UC Santa Cruz Faculty Housing, and more. Dahlstrand retired in 1984 but continued to be an active part of the Monterey Bay Community serving on the Carmel Planning Commission and participating in local art events.² Some historians have pointed out that Dahlstrand has not been widely published has not received many of the accolades that are typical of a "master architect." Others suggest that much of his greatness came from his ability to produce renderings which helped influence design and that his works show a mastery of his craft.

Integrity:

According to the National Register Bulletin (which guides historic analysis at all levels), "*Integrity is the ability of a property to convey its significance. To be listed in the National Register of Historic Places, a property must not only be shown to be significant under the National Register criteria, but it also must have integrity. The evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property's physical features and how they relate to its significance. Historic properties either retain integrity (this is, convey their significance) or they do not. Within the concept of integrity, the National Register criteria recognizes seven aspects or qualities that, in various combinations, define integrity. To retain historic integrity a property will always possess several, and usually most, of the aspects. The retention of specific aspects of integrity is paramount for a property to convey its significance. Determining which of these aspects are most important to a particular property requires knowing why, where, and when the property is significant.*"

The seven aspects of integrity are:

- Location
- Design
- Setting
- Materials
- Workmanship
- Feeling
- Association

The integrity of the shopping center, or lack thereof, is discussed in several of the reports and letter's prepared by individual historians. This has been a secondary issue to the question of does the shopping center qualify as an historic resource, as integrity is only evaluated if the project qualifies for listing in the first instance.

The two historians who found the Shopping Center eligible for listing provide 1966 to 1967/68 as the period of significance for the Shopping center. The shopping center remains in its original location but has undergone several changes in tenants and interior and exterior alterations overtime. Some of the buildings or blocks have been altered more than others. It is debated among historians if the alterations have significantly impacted the design, materials, feeling, and workmanship of the buildings and

² Sources: 1: UC Berkely Environmental Design Archives; Dahlstrand, Olof; <https://archives.ced.berkeley.edu/collections/dahlstrand-olof/>;

2: AIA Presents "Olof Dahlstrand," a Lecture by Pierluigi Serrano; <https://houseof8media.com/portfolio/aia-presents-olof-dahlstrand/>

therefore impacted integrity of the center. Staff and the Historic Resources Review Board have reviewed the information available and based on historic plans and renderings and confirmed that the location, design, setting, feeling, and association of the original design is intact despite some changes to the materials along store fronts.

Secretary of the Interior Standards

Reports provided by historians have focused on the question of historic significance of the Shopping Center. Only Diana Painter with Painter Preservation has prepared an analysis of the proposed projects consistency with the Secretary of the Interior's (SOI) for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimmer. In this case, standards for rehabilitating historic properties is the proper treatment. Painter found that the proposed project would not be consistent with the SOI standards as it is proposed. There is no known dispute or controversy over this determination. The dispute lies with question of significance that is the precursor to application of the SOI standards. In other words, the SOI standards are only relevant if the property is found to be an historic resource in the first place.

Generally, projects that comply with the SOI standards do not have an adverse impact on historic properties and can be exempt from CEQA (Section 15331 of the CEQA Guidelines). The proposed project would remove the roof connecting buildings A and B, change fenestration by creating openings in the roof and adding roll-up doors, change the roof line by adding dormers with metal roofs, wrap the existing concrete columns with hardy board siding, and contain other improvements that would change or remove features of the Shopping Center that define the character of the original Dahlstrand design.

If the Shopping Center is found to be an historic resource, the project would have a potentially significant impact on that resource as it is currently designed because it has not been designed consistent with the SOI standards and would change the character defining features thus diminishing or destroying its historic character. If the Shopping Center is found not to be a significant resource, the SOI standards would be inapplicable.

County staff had prepared an EIR for this project that has treated the property as an historic resource as required by Section 15064(g) of the CEQA Guidelines. Because the project would have a potentially significant impact on the thus far presumed historic resource, the project would have significant and unavoidable impacts on the environment. A project alternative has been included in the Draft EIR that includes a revised project proposal meeting the SOI standards. That alternative is conceptual at this point and the Design Approval alternations are not the subject of the matter before the Board of Supervisors at this time.

Applicant Comments on the Draft EIR

The applicant's representative, in commenting on the Draft EIR (See Letter from Anthony Lombardo dated January 10, 2022), contends that there would be a significant adverse economic impact if contemporary improvements to the Shopping Center are not allowed to proceed, that the site is not an historic resource, and that the EIR should be revised. To support the economic impact contention, a letter is attached to the comment prepared by Norman Hulberg of Valbridge Property Advisors, January 7, 2022. Mr. Hulberg provides his analysis of the impacts of a historic designation on the value of the Shopping Center. His analysis is that the Shopping center, and others like it (of its era), are in need of renovation or redevelopment to keep pace with changes in the market and to stay competitive. He finds that the consequences of an historic determination are that the shopping center will be unable to change with the times which will lead to:

- Decreasing occupancy rates

- Increase lag time in signing leases
- Decreasing rents
- Lowering of tenant credit strength
- Diminished desirability of the property as an investment
- Loss of customers to competitors; and
- Decreased ability to obtain loans for purchase or renovation.

The analysis finds that the shopping center has a current value of slightly over \$10 million dollars, that it is necessary to spend about \$1 million in renovations, and the adjusted current (unconstrained) value without the historic label and factoring in renovation costs, is slightly over \$9 million. Due to the factors listed above along with other information contained in the report, Mr. Hulberg suggests that the property would be worth just under \$6 million if it were considered historic and that the value would drop year after year by a factor of 10% until it would collapse from an economic point of view from decreased value, increased vacancies, and decreased rents.

Staff has reviewed the letter and information and has reservations about the conclusion contained in the report. There are many examples of successful historic shopping centers and districts and many of them are destinations unto themselves because of the historic nature.

In support of the applicants contention that the Mid-Valley Shopping Center is not historic, the applicant provided a third historian opinion (Dr. Lamprecht), and responses from Dr. Kirk. These letters have been reviewed by staff, the HRRB, and by Dr. Painter and have not changed the conclusions.

For specific comments from the applicants representative and responses to the comments, refer to the Final EIR attached to the staff report as Attachment E.

Summary of Arguments for and Against Eligibility

During the course of review of this item, arguments have been made both in favor of finding the shopping center historic (CVA, AIA Monterey Bay, and Association of Monterey Bay Area Preservationists) and against.

Arguments For Eligibility

Olof Dahlstrand is an architect of recognized greatness who influenced commercial architecture in the Carmel region. Dahlstrand was inspired by Frank Loyld Wrights' designs after touring one of Wrights' homes. He later worked with notable architects Louis and Fred Langhorst. His works reflect a unique interpretation on the "Wrightian" style of architecture and included several significant works including the Wells Fargo Building in Carmel-by-the-Sea. His works are now published in the UC Berkley Environmental Design Archives. In addition to his association with other figures of recognized greatness, Dahlstrand was individually a very talented architect and was renowned for skills as a renderer. The greatness of Dahlstrand is documented in several publications including the "*Olof Dahlstrand: The Usonians, The Magnificent Seven of the East Bay*" and Dalhstrands work has been focus of discussions by Pierluigi Serraino who is a respected architect, author, and educator at U.C. Berkely and has an expertise in California modernism styles.

The Mid Valley Shopping Center was designed by Dahlstrand (a master architect) and is an excellent example of his work on retail commercial designs. The Shopping Center exhibits a cohesive, comprehensive modern architectural expression with rooflines that mimic the hills behind it which provide the setting for the shopping center. It is well integrated design with central parking connected by pedestrian friendly walkways and landscape and flanked by understated buildings containing retail

space. The shopping center was constructed in the post World War II area when Carmel Valley began to transform from mostly agriculture to residential. There have been a few alterations to the property since the period of significance (1965-1968) but the alterations have not impacted the ability of the property and structures to convey its original integrity of design.

Arguments Against Eligibility

Olof Dahlstrand was a talented architect but not a “master.” He practiced architecture in a style created by other master architects and did not significantly influence the architectural field with his own style. The few publications that exist on Dahlstrand's work are limited. He has received no major awards or recognition during his career. One of the key publications supporting a determination of eligibility is a self-published book by a client and occupant of one of his homes in the East Bay. Even if Dahlstrand is recognized as a master architect, a property is not eligible as the work of a master simply because it was designed by a prominent architect. The Mid Valley Shopping Center was not formative or pivotal design in the career of Dahlstrand.

The shopping center structures are unremarkable and make use of features and materials that are common in retail shopping center development. It is a retail shopping center that was well conceived but has been altered many times over the years. With the past changes, even if the Dahlstrand were considered a master, and even the Mid Valley shopping center were one of his important works, the shopping center has been altered to a point where it does not retain integrity. Much of the original design and materials have been altered over the years including the addition of new buildings, changes to most of the store front fenestration, changes to exterior cladding materials, a major change at the entry to the former cinema, and other tenant improvements that have changed the appearance and workmanship of the structures. In addition, there is no evidence that Dahlstrand designed Building E (the former Standard Oil Service Station) and some suggestions that the Safeway building is actually a relatively standard corporate design replicated in many of these tenant spaces.

The property owner opposes determining the property eligible as an historic resource. Deeming the property eligible for listing will limit the ability of the property owner to modernize the property and to keep pace with changing market forces which will devalue the shopping center and could lead to vacant and blighted conditions.

Historic Resources Review Board (HRRB) Recommendation

The Monterey County Historic Resources Review Board considered this matter including all of the reports, testimony, and information at their meetings on February 3, 2022 and April 7, 2022. The HRRB commented during deliberation on the recommendation that the shopping center appears to qualify under criteria A.3 and A.5 for its design by Olof Dahlstrand and B.1 and C.2 as a recognizable structure important to Carmel Valley. Ultimately, the HRRB adopted a resolution recommending the Board of Supervisors find the shopping center eligible for listing on the Monterey County Register of Historic Resources for its association with Olof Dahlstrand by a vote of 7-1 (Attachment F). The one no vote gave no reason for the dissenting vote.