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Final EIR

# Mid-Valley Shopping Center Design Approval

PLN190140

SCH# 2020090480

May 16, 2022



Prepared by  
EMC Planning Group



FINAL EIR

# MID-VALLEY SHOPPING CENTER DESIGN APPROVAL

PLN190140

SCH# 2020090480

PREPARED FOR

**County of Monterey**

**Housing & Community Development (Planning Services)**

Craig Spencer, HCD Services Manager

1441 Schilling Place

Salinas, CA 93901

Tel 831.755.5233

PREPARED BY

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May 16, 2022

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# 1.0 Introduction

## 1.1 DRAFT EIR

The County of Monterey (hereinafter “County”), acting as the lead agency, determined that the Mid-Valley Shopping Center Design Approval (hereinafter “proposed project”) might result in significant adverse environmental effects, as defined by the California Environmental Quality Act (CEQA) Guidelines section 15064. The Mid-Valley Shopping Center’s status as a historical resource is an issue to be resolved and is the subject of the draft environmental (EIR) prepared by the County. In light of the differing conclusions of historic resource evaluations submitted by the applicant and those opposed to the project, the County chose to prepare an objective historic resource evaluation, which served as the primary basis in the draft EIR for determining whether the shopping center is a historical resource under CEQA and to evaluate the proposed project’s significant environmental effects.

## 1.2 PURPOSE OF DRAFT EIR PUBLIC REVIEW

As required by CEQA, the draft EIR was circulated for public review from November 24, 2021 to January 10, 2022 and public comments were received.

CEQA Guidelines section 15200 indicates that the purposes of the public review process include the following:

- sharing expertise;
- disclosing agency analysis;
- checking for accuracy;
- detecting omissions;
- discovering public concerns; and
- soliciting counter proposals.

## 1.3 FINAL EIR

This final EIR has been prepared to address comments received during the public review period and, together with the draft EIR, constitutes the complete Mid-Valley Shopping Center Design Approval EIR. This final EIR is organized into the following sections:

- Section 1 contains an introduction to this final EIR;
- Section 2 contains written and verbal comments on the draft EIR and the responses to those comments;
- Section 3 contains changes to the draft EIR;
- Section 4 contains a revised summary section; and
- Section 5 contains sources.

## Comments on the Draft EIR

### 2.1 CEQA REQUIREMENTS

CEQA Guidelines section 15132(c) requires that the final EIR contain a list of persons, organizations, and public agencies that have commented on the draft EIR. A list of the correspondence received during the public review period is presented below.

CEQA Guidelines sections 15132(b) and 15132(d) require that the final EIR contain the comments that raise significant environmental points in the review and consultation process, and written response to those comments be provided. A copy of each comment letter or other form of correspondence received during the public review period is provided. The number of each letter is included at the top of the first page of each letter. Numbers inserted along the margin of each comment letter identify individual comments for which a response is provided. Responses corresponding to the numbered comments are presented immediately following each letter.

Where required, revisions have been made to the text of the draft EIR. Comments that trigger changes to the draft EIR are so noted as part of the response. Revisions to the draft EIR are included in Section 3.0, Revisions to the Draft EIR.

### 2.2 LIST OF COMMENTERS ON THE DRAFT EIR AND RESPONSES TO COMMENTS

The following written correspondence was received during the 45-day public review period:

1. Alli Wood, e-mail received December 3, 2021;
2. Priscilla Walton, President, Carmel Valley Association, letter received December 14, 2021;
3. Ed J. Stellingsma, President, Mid Valley Garden Homeowners Association, letter received January 5, 2022; and
4. Anthony J. Lombardo, Anthony Lombardo & Associates, letter dated January 10, 2022.

## **2.3 WRITTEN DRAFT EIR COMMENTS**

Written comments on the draft EIR and responses to those comments are presented on the following pages.

**Friedrich, Michele x5189**

**From:** Alli Wood <oficinouno@gmail.com>  
**Sent:** Friday, December 3, 2021 1:28 PM  
**To:** ceqacommments  
**Subject:** MID VALLEY SHOPPING CENTER PLN190140 SCH#2020090480



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Hello

I'm commenting on the environmental impact report for the Mid Valley Shopping Center

I live on 9500 Center St, Carmel-By-The-Sea, CA 93923, directly behind the Safeway. When I purchased my home there was a large wall with ivy blocking the view of the Mid Valley Shopping Center. It not only reduced noise from the delivery trucks, it also served as a barrier to the mess they leave at the back of the store daily. I was quite unaware until they tore it down only months after moving into my condo and now we have trucks delivering at all hours of the night and the bushes do not deter people from walking through and leaving garbage. From my window I can see the pallets, shopping carts, garbage that never goes completely away.

During the meeting held at St.Philips we discussed a fence and the owners agreed to look into plans for an attractive fence. We have not heard or seen any such updates.

The proposal states they will remove the existing landscaping and replace it with drought tolerant landscaping. The other residents of the condominiums agree that we need a wall/fence instead of small plants.

Thank you!  
 Alli Wood

831. 241.4548

## **Response to Letter #1**

1. The comment addresses an existing condition at the shopping center that is not impacted by the proposed project. No environmental issues are raised and no response is required.

The project plans show a proposed four-foot-tall fence/ privacy wall and new tree/vegetation landscaping along the property line between Center Street and the back of Safeway. The applicant has been informed of the concerns and is willing to restore fence and tree screening in this area. This comment raises concerns that do not affect the environmental analysis contained in the draft EIR. The concerns will be included as comments on the Design Approval application and will be considered by the County through the permit review process.

## Friedrich, Michele x5189

---

**From:** Sandra Schachter <schactersj@comcast.net>  
**Sent:** Tuesday, December 14, 2021 9:30 AM  
**To:** ceqacommments  
**Cc:** Lundquist, Erik; 100-District 5 (831) 647-7755; Hardgrave, Sarah x7876; Eleanor Avila; Paola Berthoin; C.S. Noel; carmelvalleyassociation@gmail.com; Luana Conley; Rich Fox; Gawain, Marianne; Heyl, John; Janet Brennan; Kimes, Michael; Rick Manning; Marlene Martin; Mibs McCarthy; Robertson, Janice; Eric Sand; eric sand; Bob Siegfried; Dick Stott; Strasser Kauffman, Karin; Sudol, Andy; Priscilla Walton; Wiltsee, Lamont; jeff wood07  
**Subject:** CVA comments on Mid-Valley shopping center DEIR  
**Attachments:** midvalley letter 12-21.docx

[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe. ]

Attention: Craig Spencer

Dear Mr. Spencer

Attached are comments from Priscilla Walton, president of the Carmel Valley Association, in regard to the recent DEIR for the Carmel Valley Mid-Valley Shopping Center. Thank you for your consideration of our views.

Sandra Schachter, Secretary, CVA





Carmel Valley Association

preserving the beauty, resources, and rural character of the Valley since 1949



**Comment on the Draft Environmental Impact Report (DEIR)  
for the Mid-Valley Shopping Center Project  
(PLN190140, SCH#2020090480)**

The Carmel Valley Association has reviewed the DEIR for the proposed project and has the following comments:

- 1 The DEIR finds the project would result in a significant and unavoidable impact:
- “Therefore, approval of the project as proposed would result in a significant and unavoidable impact on an historical resource. The alternatives presented in this EIR will be considered by the County Planning Commission, or Board of Supervisors on appeal, in order to consider how to mitigate, if possible, the significant and unavoidable impacts of the proposed project.” (DEIR, p. 5-19)
- 2 The DEIR finds that Alternative 2: Design Modifications to Proposed Exterior Alterations in Compliance with the Secretary of the Interior’s Standards would not result in significant impacts on historical resources and would mitigate project impacts:
- “Implementation of the design modifications above would ensure the proposed project would be consistent with the Secretary of the Interior’s Standards and would not result in significant impacts associated with historical resources. Submittal of revised plans reflecting these modifications will require review and approval by a qualified architectural historian selected by the County to ensure consistency with the Secretary of the Interior’s Standards.” (DEIR, p. 10-8)
- When mitigation measures or alternatives are identified to reduce impacts to less than significant, CEQA requires their adoption. A fundamental mandate of CEQA is that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of the project” (PRC Sections 21002, 21081).
- 3 The DEIR affirms that the property is eligible for listing on Federal, California and Monterey County historic registers (DEIR, p. 5-16). The significant elements of the

MAIL P.O. Box 157, Carmel Valley, CA 93924

WEB [www.carmelvalleyassociation.org](http://www.carmelvalleyassociation.org) | EMAIL [president@carmelvalleyassociation.org](mailto:president@carmelvalleyassociation.org)

3 cont. | Mid-Valley Shopping Center's architecture are well documented, and its architect, Olof Dahlstrand, is acknowledged as a master with his body of work described in the appendix to the DEIR, Painter Preservation's Historic Resource Evaluation.

4 | The DEIR's Alternative 2 meets project objectives by offering a framework for the developer to make repairs and improvements to the Mid-Valley Shopping Center while respecting its key architectural elements. By following this framework, new modifications to the property would avert environmental impacts, offensive alterations already made by the developer would be removed, and the changes would be consistent with the Secretary of the Interior's standards for historic resources.

5 | The DEIR finds the project inconsistent with the following policies in the 2010 Monterey County General Plan: PS 12-12; PS 12-13 and PS 12-17. It also finds the project inconsistent with the Carmel Valley Master Plan Policy CV-3.13 and potentially inconsistent with Chapter 18.25 of the Monterey County Historic Preservation Ordinance. The DEIR should be revised to find that the project would have a significant impact on the environment, based on these findings.

Respectfully submitted,

Priscilla Walton, President  
Carmel Valley Association  
P.O. Box 157  
Carmel Valley, CA 93924

Dated: December 14, 2021

## Response to Letter #2

1. The commenter summarizes the conclusions of the draft EIR and does not provide a specific comment on the environmental analysis. No response is required and no changes to the draft EIR are required.
2. The project mitigation measures and alternatives as outlined in the draft EIR will be considered by the County Planning Commission, and/or the Board of Supervisors, contingent on the determination if the Mid-Valley Shopping Center qualifies as a historical resource under CEQA, as defined in CEQA Guidelines section 15064.5. If the Board of Supervisors determine that shopping center is a historical resource under CEQA, then all feasible mitigation and alternatives will be considered to reduce the significant and unavoidable impact identified in the draft EIR. The alternatives analysis found in Section 10.0, Alternatives, of the draft EIR addresses alternative design considerations prepared by Painter Preservation that would ensure exterior alterations for the shopping center would be consistent with the Secretary of the Interior's Standards for Rehabilitation. The alternatives presented in the draft EIR will be considered by the Planning Commission, and/or Board of Supervisors, in order to consider how to mitigate, if possible, the significant and unavoidable impacts of the proposed project. No changes to the draft EIR are required.
3. The commenter acknowledges the conclusions of the EIR and provides opinions regarding the shopping center and its architect. The commenter does not provide a specific comment on the environmental analysis. No response is required and no changes to the draft EIR are required.
4. The commenter concurs with the analysis prepared for Alternative 2 (Design Modifications to Proposed Exterior Alterations in Compliance with the Secretary of the Interior's Standards of the Interior's Standards) found the draft EIR (Section 10.) No response is required and no changes to the draft EIR are required.
5. The draft EIR does conclude the proposed project, which is reiterated in the policy consistency analysis contained in Table 3-1, would "materially alter" the historical significance of the Mid-Valley Shopping Center, resulting in a substantial adverse change in the significance of a historical resource and thus would create a significant and unavoidable impact. If the Planning Commission and/or Board of Supervisors agrees that the proposed project is inconsistent with the relevant general plan policies, the physical impact is still the same. No changes to the draft EIR are required. See draft EIR Section 2.0, Summary, Table 2-1 for a summary of project impacts and mitigation measures.

**Friedrich, Michele x5189**

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**From:** ed93940@aol.com  
**Sent:** Wednesday, January 5, 2022 10:53 AM  
**To:** Spencer, Craig x5233; ceqacomments  
**Cc:** mvghoa@yahoo.com; gbyrne26@gmail.com; bpniak@redshift.com  
**Subject:** Draft DEIR - Mid Valley Shopping Center  
**Attachments:** Mid Valley Shopping Ctr - DEIR Input.pdf; Back side of Safeway at Mid Valley Shopping Center - December 2021.jpg; Back side of Safeway at Mid Valley Shopping Center - Sept. 2018.jpg; Landscape barrier behind Safeway prior to removal by Stanley Group.jpg

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Dear Mr. Spencer,

By way of a follow up to our telephone conversation of Jan. 4, 2022, I have enclosed the written response to the Draft DEIR for subject project. Please confirm receipt of the attached letter to you and its attachments.

Sincerely yours,

Ed J. Stellingsma, President Mid Valley Garden Homeowners Association





## MID VALLEY GARDEN HOMEOWNER'S ASSOCIATION

Mr. Craig Spencer  
 Monterey County, Housing & Community Development  
 1441 Schilling Pl South, 2nd Floor - Salinas, CA 93901

January 4, 2022

**RE: Draft Environmental Impact Report (DEIR) - Mid Valley Shopping Center  
 9550 Carmel Valley Road, Carmel, CA 93923**

Dear Mr. Spencer:

As President of the Mid Valley Garden Home Owners Association (MVGHOA) I am writing on behalf of all the owners and residents at 9500 Center Street. Our complex, consisting of 20 two-story buildings face the entire block at the back-side of the Mid Valley Shopping Center.

We are excited and support the proposed improvements to the Shopping Center, however, significant visual/aesthetic, noise and delivery-truck traffic issues at the back of the Shopping Center must be addressed and mitigated. **Any approval for improvements must include an effective and attractive visual/sound barrier at the back of the Shopping Center.**

Such a fence/barrier was made a requirement by the Carmel Valley Land Use Committee during their hearing of July 15, 2019 and subsequent public hearings and was also agreed to by the current owner of the Shopping Center, Mr. Russel Stanley in his "Open Letter to the Community of July 26, 2019 (See attached).

I have enclosed the following documents related the blight and noise issues which surfaced after the removal of the previous landscape barrier after the Stanley Group's purchase of the Shopping Center:

- Email dated Sept. 14, 2018 to the Stanley Group's Mid Valley Shopping Center Manager.
- Letter dated November 15, 2018 to Mr. Russell Stanley.
- Ed Stellingsma's Presentation to the Carmel Valley Land Use Committee of July 15, 2019
- Open Letter to the Community dated July 26, 2019 by Mr. Russell W. Stanley.
- Letter to Mr. Brandon Swanson, Planning Services Mgr of Monterey Cty dated October 5, 2020.
- Photograph of visual blight behind the Safeway Store, December 2021.
- Photograph of the visual blight behind the Safeway Store Sept. 2018.
- Photograph of the landscape barrier behind Safeway prior to its removal by the Stanley Group.

Please feel free to contact me if you need any additional information.

Sincerely,

*Ed J. Stellingsma*

Ed J. Stellingsma, President MVGHOA



**From:** ed93940 <ed93940@aol.com>

**To:** wsterling <wsterling@sterlingmonterey.com>; tkurtz <tkurtz@sterlingmonterey.com>

**Cc:** MVGHOA <MVGHOA@yahoo.com>

**Subject:** Mid Valley Shopping Center - Meeting

**Date:** Fri, Sep 14, 2018 1:18 pm

**Attachments:** 9500 Center St - 1 Back side of Shopping Ctr.JPG (219K), 9500 Center St - 2 Removal of landscape buffer.JPG (205K), 9500 Center St - 3 Back side of Safeway.JPG (1133K)

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Hello Trevor and Bill,

It was good to meet with you to address the recently exposed blight and noise increase at the back side of the shopping center after the removal of all the shrubs/landscape buffer. Needless to say, the shrubs provided a very efficient sight and noise buffer.

The residents at the condo complex at 9500 Center St across the back side of the shopping center are in a state of shock now that they have been exposed to a substantial increase in noise on account of refrigeration trucks' deliveries to the Safeway loading dock, loading and unloading activities, truck traffic, coffee grinding activities, etc. etc. and the visual blight of dumpsters, trash, pallets, on-site storage, trucks, etc.

I have enclosed three photographs, one was taken from the back side of the shopping center before the removal of the landscape buffer, one during the removal and one after.

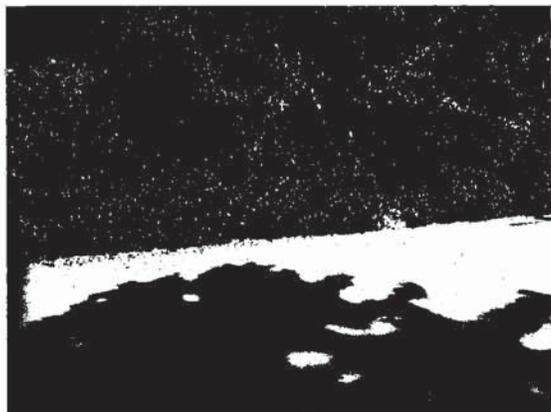
We shall look forward to a speedy resolution to this unfortunate decision that was made at the expense of the people in the neighborhood that have been loyal customers to the businesses at the Mid Valley Shopping Center. We also feel that this sudden exposure, after the removal of the landscaping that took many years to grow to the density and height, has reduced the property values of our condo complex.

I shall look forward to hearing about what resolutions will be initiated to alleviate the problems noted above.

Regards,

Ed J. Stellingsma, President - Mid Valley Garden Home Owners Association

3 Attached Images





## MID VALLEY GARDEN HOMEOWNER'S ASSOCIATION

November 15, 2018

Mr. Russell Stanley  
The Stanley Group  
18840 Los Gatos/Saratoga Rd, Suite #A  
Los Gatos, Calif. 95030

Re: Mid Valley Shopping Center, Carmel, CA.

Dear Mr. Stanley:

As President of the Mid Valley Garden Home Owners Association, I am writing this letter on behalf of the owners and residents of the neighborhood behind the Mid Valley Shopping Center. It is my understanding that you are the recent owner of the Shopping Center.

It is with dismay that we have witnessed the removal of all of the shrubs which, until last August, formed a very effective landscape barrier between the Shopping Center and its residents living in the neighborhood behind the Shopping Center. This landscape barrier took many years to grow to its density and height; it provided a very efficient sight and noise buffer (See enclosed "Before" photo).

The removal of the landscape "buffer" left us exposed to dumpsters, piles of trash, stacks of pallets, on-site storage, bales for recycling, truck traffic, excessive noise from refrigeration truck deliveries to the Safeway loading dock in back of the store and trash being blown across the street onto our landscaped gardens (See enclosed "After" photo).

After a meeting on September 13, '18 with two members of Sterling Property Management, we were led to believe that a solution would be forthcoming (See enclosed email dated Sept. 24, '18). Unfortunately, we are now being told that a resolution "is out of their hands".

The back side of this Shopping Center has become a neighborhood "nuisance" affecting the property values of our residences in violation of Para. 7 of the neighborhood's "Declaration of Conditions and Restrictions "Berwick Manor" which also govern the Shopping Center.

The people living in the neighborhood have been loyal customers to the businesses at the Mid Valley Shopping Center. We deserve an acceptable resolution to alleviate the problems noted above. We would appreciate an on-site meeting with you. I shall look forward to hear from you at (831) 626-1300 or our on-site manager Mr. Richard Helsten (831) 624-1912.

Sincerely,

Ed J. Stellingma, President Mid Valley Garden Home Owners Association

Copy of President Ed Stellingsma's presentation to the Carmel Valley Land Use Committee Hearing of July 15, '19 regarding proposed "improvements" by current owner to the Mid Valley Shopping Center. Among other recommendations, the Committee voted that the back-side of the Center be screened.

Good evening,

My name is Ed Stellingsma, I am the President of the Mid Valley Garden Home Owners Association representing 64 condominiums located on Center Street, directly behind the **Mid Valley Shopping Center**. A number of owners and residents have joined me here as well.

I appreciate the opportunity to provide feedback on tonight's proposal before you by **Mid Valley Partners LLC**.

Naturally, we are excited about any effort to improve our neighborhood Shopping Center **BUT** any approval for improvements should include a visual and sound barrier at the back of the Shopping Center.

Last August, shortly after the sale of the Shopping Center to the current owners, **we witnessed with dismay the removal of all the bushes and a number of major trees on the backside of the Shopping Center**. We were told by the Center's management company that the work was done on account of a rodent problem.

Actually the problem was created by stacking food waste on the ground each time the dumpster was full. This practice caused the rodent problem, not the bushes that had grown approx. 20 ft tall that formed a **very effective visual and sound barrier between the back-side to the Shopping Center and our condominium complex**.

I have some photographs that show the bushes **before** the massive removal, **during the work** and the **after**, exposing dumpsters, trash, stacks of pallets, bales of recycle cardboard, delivery trucks, etc.

The backside of the shopping center looks like an **industrial zone** facing our complex.

We have tried to address the problem with the Owner's representative but our request has fallen on deaf ears. That's why we are here to make sure that the visual and sound problems that plague our residential community are addressed with some visually attractive fence design solution incorporated with the request for improvements before you today.

Thank you.



## The Stanley Group, Inc.

July 26, 2019

Open letter to the Community

Re: Mid Valley Shopping Center

As the new owner of the Mid Valley Shopping Center (we purchased the property a little over a year ago) it is and remains our intention to enhance the shopping center with a "soft modernization" of the exterior while retaining the rustic nature so prevalent in Carmel Valley. This would include creating many social areas where local residents and customers alike could mix to enjoy the atmosphere and catch up with their neighbors, allow young families to spend time outside the house in a fun, safe environment and create more harmony by providing social functions for the community. Our plans include the creation of a small park area for community events, water reduction through drought tolerant plants of up to 75% of current water usage, exterior paint, noise reduction fencing in the rear of the property and many other enhancements to the Shopping Center.

It is extremely important to us to respect the character of Carmel Valley. We are long term holders of property and look forward to many, many years of enjoyment with this Shopping Center through our enhancement of its beauty and character as well as our interaction with our tenants and the community. We have many positive community events in mind which we believe residents such as yourselves will appreciate.

To clarify our intent as it has been vastly distorted in the recent press, we are not planning any increase in building size or square footage. we do not intend to create a tourist destination with the center, but do believe our tenants need and desire to attract more business whether it be local or part of the tourists visiting Carmel Valley to enjoy its weather, restaurants, shops, and other features and benefits.

I'm hopeful the community values not just the auto repair business, but all our tenants, and if so, we need your support to keep them in business. Just during our recent ownership, we have lost a number of our tenants. The Mid Valley Center is old, tired and in need of substantial refurbishment in order to sustain our current tenants and attract new tenants. Like most small businesses today, many are struggling, and we need to find a way to drive additional foot traffic to the center.

With specific regard to some within the community who insist the auto repair shop remain, we have made a decision to rescind our application for the wine tasting room at the Auto Repair location and have agreed to a one year extension subject to their

agreement to reimburse us for normal operational costs of the center (as do all the other tenant's).

As environmentally conscious owners, we struggle with the idea having a tenant with solvents, gas, oil, radiator fluids and other hazardous chemicals just a few feet from the water table of the Carmel River. This causes us great concern, considerable anxiety and creates the potential for tremendous future liability for any hazardous release of toxics into the environment. We do not feel comfortable with such liability on a long-term basis.

We want the center to remain a local, neighborhood center and do not intend to change its character or integrity. A "soft rustic modernization" will go a long way toward bringing the center back to its luster and will provide residents with many more quality options nearby their homes rather than forcing them to drive a considerable distance for their daily needs. We intend to maintain the service nature of the center and will look to attract local tenants who fulfill basic necessities while also bringing a sense of today's needs into play.

Times change and businesses must evolve. When the center was first constructed there was a large movie theater built as part of the center, economics, demographics and time forced it out decades ago and the center was subsequently modified, storefronts changed, roofs adjusted, colors changed to reflect and attract other retail uses active at that time.

Likewise, with the advent of modern times, Amazon and the changing face of retail, changes in demographics and purchasing habits the center must change and evolve. It needs to be more service oriented and have more dining and social options. To remain the same will only result in the continued deterioration of the Shopping Center, loss of tenants and its eventual failure.

We intend to create a small park in the center for the benefit of local residents to sit and enjoy a sandwich, coffee or social hour with their neighbor, a place for young parents to spend time with the children while getting a break from parenting duties (if only for a few minutes). Many social events will be planned such as yoga on the grass, Easter egg hunts, outdoor BBQ, movie nights, etc. all again for the benefit of local residents.

Our goal is to bring back a strong sense of local community by creating and enhancing the Shopping Center to allow for greater social interaction between neighbors. Many residents live in somewhat remote areas or have large lots and do not have the benefit of daily interaction with their neighbors. We envision our center becoming a gathering place for those who desire more social interaction with their community.

We are planning a workshop on the evening of August 6<sup>th</sup> from 6:00-8:00pm which will allow us to present our ideas to the community and seek input and suggestions. I hope you will attend the workshop and if you are unable, I am happy to personally meet with anyone to discuss the property and our plans.

Everyone may have their own opinion as to our plans, but we have the best of intentions toward the local community and will continue to work toward proving ourselves with our future plans. I think when the dust settles the community will enjoy our plans and ideas, new social areas and appreciate the increased community interaction.

Sincerely,  
Russel W. Stanley

A handwritten signature in black ink, appearing to read 'RS', written in a cursive style.

President  
The Stanley Group, Inc.

**From:** ed93940@aol.com,  
**To:** swansonb@co.monterey.ca.us,  
**Cc:** mvghoa@yahoo.com, suzanne.zadeh966@gmail.com, kdklarich@sbcglobal.net, enos3@sbcglobal.net, bpniak@redshift.com, 24kdanz@gmail.com, gbyrne26@gmail.com,

**Subject:** Mid-Valley Shopping Center (PLN190140

**Date:** Mon, Oct 5, 2020 4:05 pm

**Attachments:**

Dear Mr. Swanson:

In reference to subject Draft Environmental Impact Report, I am writing on behalf of all the residents/owners of the Mid Valley Garden HOA, located along the entire block of Center Street, directly behind the Mid Valley Shopping Center.

We have attended the Dec. 2, 2019 and July 15, 2019 CV Land Use Advisory Committee meetings and were assured that an attractively designed fence on the back side of the shopping center would be included in any design effort/approval of improvements at the Shopping Center.

The photos below illustrate the visual and sound blight that was created behind the shopping center after all the brush was removed by the current owner. The removal of the landscape "buffer" left us exposed to dumpsters, piles of trash, stacks of pallets, on-site storage, bales for recycling, truck delivery traffic, excessive noise from refrigeration truck deliveries, etc. etc.

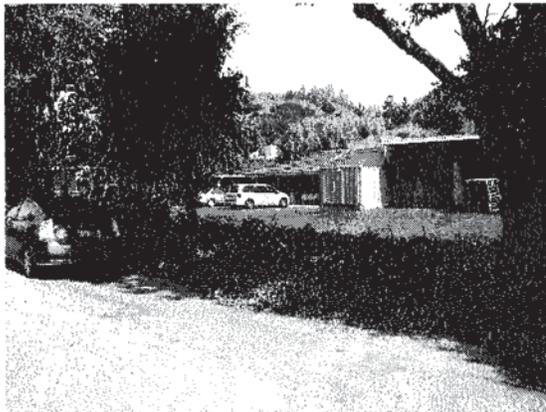
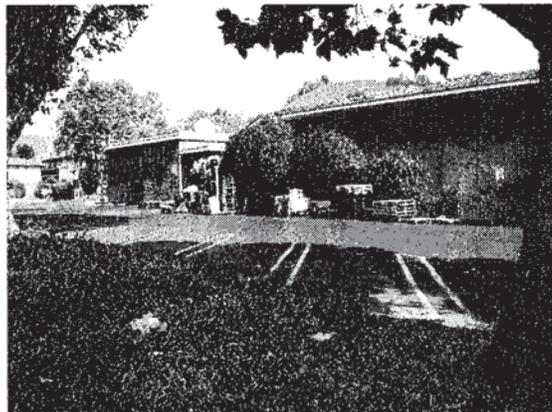
The back of the shopping center has become a neighborhood "nuisance" affecting the property values of our residences in violation of Para. 7 of the neighborhood's "Declaration of Conditions and Restrictions "Berwick Manor" which govern the neighborhood, including the shopping center.

Yet, none of the Proposed Exterior elevations (Figure 4) of the Draft Environmental Impact Report appears to address this issue. We deserve an acceptable design resolution to alleviate the problems noted above.

Thank you for your consideration.

Please confirm receipt of this email.

Ed J. Stellingsma, President - Mid Valley Garden HOA



Mid Valley Garden HOA faces the back-side of the one-block long shopping center.







### **Response to Letter #3**

1. See Response to Letter #1.

**ANTHONY LOMBARDO & ASSOCIATES**

A PROFESSIONAL CORPORATION

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Our File No: 5268.000

Craig Spencer, Chief of Planning  
Monterey County  
Housing & Community Development  
1441 Schilling Place  
Salinas, CA 93901

RE: Mid Valley Shopping Center DEIR Comments

Dear Craig:

We have completed our review of the Mid-Valley Shopping Center (MVC) Draft Environmental Impact Report (DEIR) and offer these comments:

**GENERAL COMMENTS**

1 | The County of Monterey has not designated the MVC to be an historic resource as defined by Monterey County Code Section 18.25.030 nor has the County made a decision that the MVC is an historic resource under the California Environmental Quality Act.

2 | The MVC DEIR is the result of conflicting opinions of the historic significance of the MVC. The MVC DEIR however was prepared based on the assumption that MVC is a significant historic resource relying solely on the opinion of Diana Painter. The DEIR does not objectively analyze any of the numerous expert opinions which have been submitted to the County which reached an entirely different conclusion than did Ms. Painter nor does it examine potential mitigations other than adherence to the Secretary of the Interior’s Standards.

3 | The purpose of an EIR is to fully and objectively inform decision makers<sup>1</sup> of a project’s<sup>2</sup> potential significant adverse environmental impacts<sup>3</sup> based on substantial evidence<sup>4</sup> in the record.

<sup>1</sup> The basic purposes of CEQA are to:(1) Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities. (2) Identify ways that environmental damage can be avoided or significantly reduced. (3) Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible. (4) Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved. (14CCR15002)

<sup>2</sup> “Project” means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment...(14CCR15378)

<sup>3</sup> “Significant effect on the environment” means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant. (14CCR15382)

<sup>4</sup> (a) “Substantial evidence” as used in these guidelines means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Whether a fair argument can be made

3 cont. | In this case, the DEIR should serve two purposes. First, it should provide evidence upon which decision makers can decide if MVC is in fact historically significant. Then, if the conclusion is that MVC is significant, inform the decision makers of the impact of the proposed project, possible alternatives and the affect that determination will have on the future of the MVC.

4 | The DEIR does not at an early stage adequately disclose that finding a property or object to be historically significant is reserved solely to Monterey County Board of Supervisors<sup>5</sup>. Many statements imply that the Monterey County Planning Commission has a statutory role in that determination; they do not.

5 | The MVC DEIR should discuss that the CEQA Guidelines provide decisions that the significance or lack of significance of the MVC may be based on the preponderance of the evidence.<sup>6</sup>

6 | The DEIR does not address the significant adverse economic impact to the MVC if contemporary improvements are not allowed to proceed. Loss of those improvements could lead to the further demise of the MVC. Mr. Norm Hulbert, MAI has prepared the attached letter (Exhibit A) which goes into significant detail to assess the significant adverse economic impact designating MVC as historically significant will have. Mr. Hulbert concludes:

The unconstrained scenario reflects a value of \$10,080,000; however, it is necessary to spend about \$1 million to renovate the property. Thus, for comparison purposes we should view the unconstrained value as \$9,080,000. This compares with the historic scenario of \$5,901,000, a difference of \$3,179,000.

**Impact of Increasing Vacancy Due to Historic Designation**

Year	2	3	4	5	6
Vacancy	10%	20%	30%	40%	50%
NOI	\$531,077	\$495,491	\$459,781	\$424,018	\$388,616
Cap Rate	9.0	9.0	9.0	9.0	9.0
Value	\$5,901,000	\$5,505,522	\$5,108,000	\$4,711,311	\$4,317,955

We did not run the analysis beyond Year 6 because at that point it is likely the entire operation would collapse, from an economic point of view. Recall that the non-historic value was \$9,080,000 (net of \$1M renovation). By Year 6 over half the value has been lost.

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that the project may have a significant effect on the environment is to be determined by examining the whole record before the lead agency. Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence. (b) Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. (14CCR15384)

<sup>5</sup> Section 18.25.090 A, Monterey County Code

<sup>6</sup> See Guidelines Section 15604.5.b(2)(B); The party bearing the burden of proof must present evidence which is more credible and convincing than that presented by the other party or which shows that the fact to be proven is more probable than not (Merriam Webster).

6 cont.

The reader is reminded that in Years 2-6 the only change was the vacancy rate. We did not decrease the rent. In the face of escalating vacancy, it is nearly assured that management would be forced to lower rents to “whatever they could get.” Thus, we believe that value erosion above to be conservative. Again, this is not an appraisal; a number of simplifying assumptions have been made.

In conclusion, change is constant in retail centers. Competitors emerge, consumer tastes change, designs change. It is unheard of for a retail center to remain locked in design without suffering economically. We believe Mid Valley Center would be significantly impacted were it to be placed in an historic district.

The DEIR does not discuss that financial impact of a project can be a factor in making a decision on the project:

“failure to approve the application for a permit will cause an immediate and substantial financial hardship because of conditions peculiar to the particular structure or other feature involved, and the damage to the owner of the property is unreasonable in comparison to the benefit conferred to the community, the Review Board may approve or conditionally approve such permit even though it does not meet the standards set forth in this Chapter.”<sup>7</sup>”

#### **OTHER EXPERT ANALYSIS**

7

Ms. Painter’s conclusion that the MVC is historically significant is based on her opinion that Olof Dahlstrand was a “master architect” and that the MVC was at one time architecturally significant (there is no clear or convincing evidence that it was) and it has maintained its integrity.

8a

Dr. Laura Jones (Appendix G) reviewed both Dr. Kirk’s and Laura Kozakavich’s (Page and Turnbull) opinions and on page 1 of her report detailed the areas of agreement and disagreement between the two. She wrote:

“This report, prepared for the owner of the property, reviews the arguments presented in two prior evaluations of the Mid Valley Shopping Center: an evaluation by Anthony Kirk and a second by Stacey Kozakavich. Both Kirk and Kozakavich concur that:

- The shopping center is not significant for association with significant events.
- The shopping center is not significant for association with significant people.
- The shopping center is not a rare or early example of a shopping center, even at the local level.
- The building located at the southeast corner (“Building C”) is not significant for architectural design, or as the work of a master.
- The shopping center is not eligible for information potential.
- The shopping center’s integrity has been “compromised” by alterations.

<sup>7</sup> Section 18.25.175, Monterey County Code

8b Kirk further finds that:

- There is no documentation that Dahlstrand designed the service station.
- There is no evidence for the rumor that the exposed aggregate in the integrally colored concrete was mined from the Carmel River; specifications suggest it was obtained from local building suppliers without any special instructions.

The two reviewers disagree regarding

- Is the shopping center significant as the work of a master?
- Does the shopping center maintain integrity?

This review *examines the evidence* (*emphasis added*) regarding these two factors [work of a master and architectural integrity].”

8c Dr. Jones report is clear, thorough, balanced and direct. She wrote regarding Olof Dahlstrand:

“What conclusions can we draw from this evidence?

- Olof Dahlstrand was a competent local architect who successfully practiced in a style developed by a figure of recognized greatness: Frank Lloyd Wright. However, Dahlstrand is not mentioned in the scholarly literature on “Organic Architecture.”
- Olof Dahlstrand was a talented artist and illustrator.
- Olof Dahlstrand is not a “figure of generally recognized greatness.”
- The Carmel Valley Shopping Center was not “the work of a master<sup>8</sup>.”

8d The Kozakavich finding that the shopping center is significant as the “work of a master” is not well-supported. Kirk’s report finds that the shopping center is not a significant design by Dahlstrand by comparison to other buildings he completed in the Carmel region. There is therefore no strong evidence to support a finding of significance for the Mid Valley Shopping Center as the “work of a master”.”

Dr. Jones then presents a substantial discussion of the MVC’s architectural integrity on a building-by-building basis. She found:

9a “Dahlstrand’s design called for the following colors and materials: wood shake roof, weathered grey redwood framing, integrally-colored brown precast concrete with exposed aggregate, bronze aluminum, anodized glass, clay block and off-white filler panels. Where these elements have been replaced, obscured or altered there is a loss of integrity.

Alterations to exterior elevations and landscaping have altered nearly every feature on the original plan.

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<sup>8</sup> Monterey County Code defines a master architect as one “whose talent influenced a particular architectural style or way of life” (Section 18.070.25 (5)).

- 9b | The Mid Valley Shopping Center has lost integrity of setting, design, workmanship, materials, feeling and association.
- The finding that the Mid Valley Shopping Center is eligible for listing on the California Register as the “work of a master” is not supported by evidence that Olof Dahlstrand is a “figure of generally recognized greatness.” No substantial evidence has been offered for eligibility of all or part of the shopping center as a historic resource.
- 9c | Even if a new argument were assembled to support such a finding, the complex lacks integrity and cannot convey its original design intent. It is my professional opinion that the Mid Valley Shopping Center would not be eligible for listing in the National Register of Historic Places nor the California Register of Historical Resources. It also does not appear eligible for the Monterey County Local Official Register of Historic Resources, if nominated. I concur with Kirk’s evaluation in this regard.”

These same issues and related evidence, including work by Diana Painter, were evaluated by Dr. Barbara Lamprecht (Exhibit B [Executive Summary] and Exhibit C [Letter of Memorandum]). Dr. Lamprecht concluded:

- 10a | “Mr. Dahlstrand is not a *“figure of generally recognized greatness in a field.”* His work was not published widely at the state or national levels, it did not have an impact on the architecture profession, and it did not influence its wider direction. The Center was not a formative or pivotal design in his career nor has it had an important impact on the Carmel community.”
- 10b | “The Center does not *“embody the distinctive characteristics of a type, period, or method of construction.”* It blends a number of styles from various sources and time periods. Its construction, combining concrete, heavy timbers, exposed aggregate, and wood shake roof is common in commercial work.”
- 10c | “The National Register requires that a property possess *high* artistic values in order to be eligible for designation. While the Carmel Valley Shopping Center is a good example of Mr. Dahlstrand’s work, it is not an outstanding or innovative expression of Modernist ideals or values. Its low, broad, wood shake roofs and deep overhangs are old and familiar features on the Peninsula and Carmel, from Julia Morgan’s iconic Asilomar, 1913, to the area’s rustic vernacular architecture set amidst woods and pines. Thus, these features are not “Modern,” as characterized in other reports, which also associated such features as primarily inspired by Frank Lloyd Wright...” (Note: On Page 7 of Dr. Lamprecht’s memorandum (Exhibit C) she writes “While clearly inspired by Wright, both Page & Turnbull’s and Painter Preservation reports suggest that Dahlstrand had a close connection to his hero, however, it appears that Dahlstrand never apprenticed or worked for Wright.”

10d | “The Center appears to be derivative of the nearby Del Monte Shopping Center, designed by master architect John Carl Warnecke FAIA and built in 1967. Mr. Dahlstrand’s own records note that he did renderings of the Del Monte complex for Warnecke in 1960 and in 1964, and the two centers strongly resemble one another. With its buildings wrapping around a large parking lot, the Carmel Valley Shopping Center’s plan follows a common paradigm for postwar suburban shopping centers.”

10e | “It does not demonstrate a new and thoughtful approach to addressing the pedestrian along with the car – as does the Del Monte center, whose “corridor” of varied landscapes champions pedestrians while relegating cars to the perimeter.”

10f | “The Carmel Valley Shopping Center is *not* a historic district, as has been argued in a previous evaluation. A historic district is usually interpreted as a group of buildings that are perhaps constructed at different times by varied persons but are all related by a common theme. Designed by one person, at one time, as a holistic design, the Carmel Valley Shopping Center is a single property with multiple buildings.”

10g | “Notably, while the Center does not appear to be eligible for designation, none of its buildings, rooflines, and materials are being demolished. It will remain a familiar part of the community, enhanced by sensitive renovations, new retail opportunities, and more community involvement.”

Dr. Anthony Kirk, the author of the initial historic evaluation, wrote to Brandon Swanson in January 2020 (Exhibit D). That letter, which was not included in the DEIR appendices, went into great detail identifying numerous factual errors in the Page and Turnbull report’s conclusion that MVC was historically significant. Dr. Kirk concluded:

11a | Finally, in my opinion, the Carmel Valley Shopping Center is not a “Wrightian-inspired design.” Wright was a master architect, possibly the most important and celebrated of all American architects. He designed a single shopping center over the course of his lifetime, the Anderton Court Shops, a small three-story complex that is on the National Register of Historic Places.

11b | In my opinion the Carmel Valley Shopping Center is not eligible for the National Register of Historic Places, the California Register of Historical Resources, or the Monterey County Local Register of Historical Resources.

Dr. Kirk subsequently wrote to our office (Exhibit E) in December 2021, after reviewing the DEIR and confirmed his opinion. He wrote:

12a | I have carefully read the Mid-Valley Shopping Center Design Approval Draft EIR. It has not altered my original opinion of the Carmel Valley Shopping Center, which, as you recall, is that it does not meet the criteria for inclusion in the National Register of Historic Places under Criterion C, the California Register of Historical Resources under Criterion 3, or the Monterey County Local Register of Historical Resources under Criteria A5, C1,

12a cont. | or C2. [and is flawed by its] reliance for much of the information it contains on the report written by Page & Turnbull, dated 11 November 2019.

12b | As I stated at the outset of this letter, the Carmel Valley Shopping Center does not appear to be eligible for listing in the National Register of Historic Places under Criterion C, the California Register of Historical Resources under Criterion 3, or 6. Monterey County Local Register of Historical Resources under Criteria A5, C2. Dr. Lamprecht concurs with me.

Dr. Kirk also wrote to Russ Stanley in December 2021 (Exhibit F) discussing in depth his conclusion that Olof Dahlstrand was not a “master architect.” He wrote:

12c | Other sources make it evident that Olof Dahlstrand was not considered a master architect. He was never named a Fellow of the American Institute of Architects, an honor accorded designers “who have made outstanding contributions to the profession through design excellence, contributions in the field of architectural education, or to the advancement of the profession.” He is not among the 8,400 architects listed in the Pacific Coast Architecture Database, which includes designers in California, Oregon, and Washington. No examples of his work are included in the National Register of Historic Places, nor is he mentioned in *Architectural Record*.

12d | Although the Carmel Valley Shopping Center may be considered an expression of Organic architecture, it is clearly not a good example of the style. Dahlstrand retired early, devoting the last thirty years of his life to art and public service. To date, no evidence has appeared that suggests he was a master architect.

### SPECIFIC COMMENTS

Where possible, specific quotes from the DEIR will be provided. Our comments in response to the quote will be in *italics*.

13 | Page 1-2:  
The DEIR states “The significant effects are discussed with emphasis in proportion to their severity and probability of occurrence.”

*We cannot find any discussion of proportionality or severity of the “significant effects” in the DEIR. The DEIR concludes that any change that does not meet the Secretary of the Interior’s Standards will have a significant adverse impact on the MVC.*

14 | *The DEIR does not discuss alternative mitigations, such as an on-site photo history of the MVC and Dahlstrand, which may reduce the impact to a less than significant level.*

15 | *The DEIR does not examine the nexus or rough proportionality of the proposed mitigation in relation to the project’s actual impact.*

16 The DEIR states regarding Forecasting “the report preparers and technical experts used best available efforts to find and disclose all that it reasonably can.”

*Page 3-9 of the DEIR is clear that the only professional opinion utilized in the EIR is that of Diana Painter<sup>9</sup>. The DEIR references other professional opinions and includes some of them as appendices, however the DEIR makes no effort to objectively and independently evaluate those opinions and balance the evidence they present.*

17 *The DEIR makes no effort to evaluate the potential adverse impacts<sup>10</sup> that are readily foreseeable should the MVC fail to thrive nor does it consider the impact to future projects in the MVC should MVC be determined to be historically significant. It should be acknowledged that every future change, such as paint, windows, landscaping, signs, etc., will need to be evaluated against the Secretary of Interior Standards and be subject to an extensive review process. This laborious process will severely impact leasing efforts as very few, if any, tenants would be willing to wait through such a difficult, expensive and time consuming process when the tenant can instead lease space nearby without all the excessive costs, restrictions and limitations.*

18 *The DEIR does not discuss the benefit of changing roofing materials from shake to a more fire safe material and whether that benefit outweighs the potential impact of that portion of the project.*

19 Page 1-3:

The DEIR states “In accordance with CEQA Guidelines section 15148, preparation of this draft EIR was dependent upon information from many sources, including scientific documents relating to environmental features.”

*That statement is inconsistent with the DEIR’s statement on page 3-9 that the only professional document utilized in the DEIR is that of Diana Painter<sup>7</sup>.*

20 Page 1-5:

The DEIR states “Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects.”

*This statement implies that any comments that challenge the DEIR’s conclusion that the project will have a significant environmental impacts and offers substantial evidence to support that conclusion are not “helpful.” It is our opinion that comments, supported by substantial evidence, which challenge the DEIR’s conclusions are essential to the validity of the CEQA*

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<sup>9</sup> “The following consistency analysis uses Painter Preservation’s historic resource opinion, as Painter Preservation is under the County of Monterey’s contract with EMC Planning Group. Therefore, Painter Preservation’s opinion represents an objective evaluation. (MVC DEIR page 3-9)”

<sup>10</sup> 14CCR15382 A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

20 cont. | *process and to the DEIR itself. Without such comments, the decision makers would be denied vital information they would need to make a fully informed decision.*

21 | Page 1-6:

The DEIR states “CEQA Guidelines section 15090 requires lead agencies to certify the final EIR prior to approving a project. The lead agency shall certify that the final EIR has been completed in compliance with CEQA, the final EIR was presented to the decision-making body of the lead agency and that the decision-making body reviewed and considered the information contained in the final EIR prior to approving the project, and that the final EIR reflects the lead agency’s independent judgment and analysis.”

*This statement is somewhat misleading in that it gives the impression that the Board of Supervisors (the lead agency) must agree with the conclusions of the DEIR that MVC is historically significant to approve the project. It should be made clear that following the EIR process the Board could certify the FEIR, and conclude based on the preponderance of the evidence in the record that MVC is not historically significant and approve the project or if it is found to be significant adopt a statement of overriding consideration and approve the project.*

22 | Page 2.2:

The DEIR states “This [the no project alternative] would return the shopping center to its “baseline” condition prior to the unpermitted alterations that occurred in 2019.”

*The decision as to whether or not the MVC was significant at the time the baseline was established has not been made. There is substantial evidence in the record that the MVC was not and is not significant.*

23 | The DEIR states “Under this alternative, certain proposed exterior alterations to the Mid-Valley Shopping Center would be modified to ensure consistency with the Secretary of the Interior’s Standards.”

*There is no specificity in this statement. Which “certain proposed exterior alterations” would need to be modified? Which would not? What degree of significance and impact can be attributed to those changes?*

24 | Page 2-5:

The DEIR states “Consideration of an affordable housing project on the site as a project alternative was not considered as such an alternative would not meet any of the project objectives and would likely result in greater environmental effects including demolition of a potentially significant historical resource.”

*This statement does not provide important information to the decision makers:*

*The Affordable Housing Overlay (AHO) program is laid out in great detail in the 2010 Monterey County General Plan policy LU-2.11 to “encourage the development of affordable and*

24 cont.

*workforce housing projects...” The AHO program is also an essential factor in the County’s Housing Element and as a means for the County to meet its State mandated affordable housing requirements. By dismissing the alternative because it would “likely result in greater environmental effects”, the County is also seemingly dismissing the viability of the AHO in this location, particularly if the MVC is found to be a significant historic resource. The DEIR provides no analysis or evidence to support this conclusion. This discussion needs to be expanded to address, at a minimum, these questions:*

- *Does designating the MVC to be a significant historic resource impede or preclude a change in use to residential use?*
- *Could all or portions of the MVC be converted to residential use and keep the features that are alleged to make the MVC significant?*
- *How many units could be provided on site based on existing levels of use for traffic, water and wastewater?*
- *The AHO is larger than the MVC. The AHO is approximately 13 acres, meaning the AHO was expected to be available for at least 130 units, but as many as 390 units. How does this conclusion of “greater environmental effects” affect the viability of the balance of the Mid-Valley AHO?*
- *How will the potential loss of units in the AHO be replaced?*

25

The DEIR states “If the Monterey County Planning Commission, or Board of Supervisors on appeal, finds that the property is not eligible for listing on the local, state, or national historic registers, then the County’s decision would reflect a review and approval/denial of the proposed project without an impact on a historical resource.”

*This error is repeated throughout the DEIR. Chapter 18.45 of the Monterey County Code is clear that the determination that a property, building or specific features are a significant historic resource is solely the responsibility of the Board of Supervisors. We have previously noted this error appears many times in the DEIR. Going forward we will not note each instance.*

Page 2-6:

26

The DEIR states “The shopping center’s status as a historical resource is an issue to be resolved and is the subject of this EIR.”

*This statement is inconsistent with page 1-1 which states “This EIR is an informational document that is intended to inform the decision makers and their constituents, as well as responsible and trustee agencies of the environmental impacts of the proposed project and to identify feasible mitigation measures that would avoid or reduce the severity of the impacts.”*

27

The DEIR states “In light of the differing conclusions of historic resource evaluations submitted by the applicant and those opposed to the project, the County has chosen to prepare an objective historic resource evaluation, which serves as the primary basis in this EIR for determining whether the shopping center is a historical resource under CEQA and to evaluate the proposed project’s significant environmental effects.”

27 cont. *We do not find the DEIR to present an objective evaluation (see Footnote 7). The DEIR seemingly accepts Ms. Painter's opinion and makes no effort to evaluate any other opinion, to provide a balance among the opinions or in any way compare or contrast the opinions of other experts. The DEIR deems the Painter opinion to be objective based solely on the fact that she acted as a subconsultant to EMC. There is no peer review of her opinion and no apparent critical review by EMC or the County of that opinion.*

*There is no explanation of why the significant evidence presented in the Kirk, Jones and Lamprecht analyses are not objective or are somehow in error.*

Page 3-1:

28a *The DEIR describes the project setting as if it were a static site. The project setting is a shopping center and as such has had constant changes since it opened and has continued to change since work on the DEIR started. The DEIR needs to identify numerous exterior changes (as did Dr. Jones) that have occurred since the MVC opened and evaluate the cumulative effect of those changes on the significance of the MVC. As noted earlier, Dr. Jones found:*

28b *Dahlstrand's design called for the following colors and materials: wood shake roof, weathered grey redwood framing, integrally-colored brown precast concrete with exposed aggregate, bronze aluminum, anodized glass, clay block and off-white filler panels. Where these elements have been replaced, obscured or altered there is a loss of integrity.*

28c *Alterations to exterior elevations and landscaping have altered nearly every feature on the original plan.*

Page 3-2:

29 The DEIR states the "environmental baseline upon which project is assessed is the condition of the Mid-Valley Shopping Center prior to the 2019 unpermitted exterior alterations..."

*That baseline is incorrect. The correct baseline is "physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced..."<sup>11</sup> It is established in case law<sup>12</sup> that the actual physical condition can include conditions which were created without benefit of permits and approvals.*

Page 3-9:

30 The DEIR states "The following consistency analysis uses Painter Preservation's historic resource opinion, as Painter Preservation is under the County of Monterey's contract with EMC Planning Group. Therefore, Painter Preservation's opinion represents an objective evaluation."

<sup>11</sup> 14CCR15125

<sup>12</sup> *Riverwatch v County of San Diego* (1999) 76 CA4th 1428, 1451; *Fat v County of Sacramento* (2002) 97 CA4th 1270

30 cont. *As previously stated, the DEIR's assertion that Ms. Painter's opinion is objective is based solely on the fact she acted as a subconsultant to EMC and is highly questionable. There is no peer review of her opinion and no apparent critical review by EMC or the County of that opinion. The DEIR makes no effort to evaluate any other opinion, to provide a balance among the opinions or in any way compare or contrast the varying opinions.*

Table 3-1:

31 *Table 3-1 is misleading in that it lists policies and code sections and analyzes them as if the decision that the MVC is historically significant has already been made. It should be made very clear that decision is reserved solely for the Board of Supervisors and that decision has not yet been made.*

*The same policy analysis table should be included based on the conclusion MVC is not a significant resource.*

Page 4-2:

32 *The DEIR's statement of the purpose of the Design Control district is incomplete. The full, stated purpose is "to provide a district for the regulation of the location, size, configuration, materials, and colors of structures and fences, except agricultural fences, in those areas of the County of Monterey where the design review of structures is appropriate to assure protection of the public viewshed, neighborhood character, and to assure the visual integrity of certain developments without imposing undue restrictions on private property<sup>13</sup>." The key portion of this statement is that the regulation is not to impose an undue restriction on the use of the property. The DEIR should be clear in its discussion designating the MVC to be a significant historic resource will put severe restrictions on the property and be a barrier to the ability of the MVC to continue to evolve to meet the needs of the community and businesses.*

Page 4-6:

33 *The DEIR indicates the FEIR will be used to evaluate PLN190140, demolition permits and building permits. It is not clear if the FEIR will be used in the review and evaluation of future projects at the MVC and, if so, how that will potentially impact future projects and the continuing evolution of the MVC that will be needed to meet the needs of residents and businesses.*

Page 5-11:

34 *The DEIR states "However, the final determination of historical significance of the shopping center lies with the Monterey County Planning Commission, or the Board of Supervisors on appeal, with County staff and the County's Historic Resources Review Board serving in an advisory role."*

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<sup>13</sup> Section 21.44.010 Monterey County Code

34 cont. *The Historic Resources Review Board's role has very specific responsibility. They are required to "recommend to the Board of Supervisors approval, approval with conditions, disapproval, or modification of the proposal. The Review Board's recommendation shall be in writing and shall include findings of fact [which will have to be supported by the preponderance of the evidence] relating to the criteria for designation contained in Section 18.25.070 of this Code that constitute the basis for the Review Board's recommendation<sup>14</sup>."*

35 Page 5-11 through 5-13:

*This portion of the DEIR attempts to summarize the various other reports and opinions that have been submitted and are in the appendices. Providing summaries of other professionals' opinions in the DEIR is questionable as they may inadvertently convey the bias of the persons who prepared the summary and may not adequately or accurately convey the opinion expressed in those reports and opinions. The DEIR should clearly direct the reader to the appendices for the specific evidence and analysis of the respective writers.*

*It should also be noted that the January 3, 2020 letter from Dr. Kirk to Brandon Swanson (Exhibit D) is not included in the Appendix.*

36 Pages 5-15 through 5-18:

*These pages are essentially a summary of Diana Painter's conclusions. We believe Ms. Painter's evaluations (Appendices I, J and K) are seriously in error. We have attached independent opinions of experts (Exhibits B-F) all of which conclude Painter's findings of MVC's architectural significance and concluding that Olof Dahlstrand was a master architect are flawed and lack substantial evidence to support her conclusions*

37 Pages 7-1 through 7-10:

The DEIR states "Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable."

*It is unclear to us as to why cumulative impacts require discussion in this DEIR. The project is a design approval and not a change of use from the existing shopping center. The issue is whether or not the MVC is historically significant. Neither the project at hand or that determination can be expected to generate a measurable impact much less one that could be "cumulatively considerable."*

38 Pages 8-1 and 8-2:

*We find the Impact Analysis to be confusing.*

The DEIR states "Based on the environmental analysis provided in this EIR, most of the

<sup>14</sup> Section 18.25.080 C, Monterey County Code

38 cont.

significant impacts of the proposed project can be reduced to less than significant by implementing mitigation measures presented in this EIR. However, the project would result in the following significant unavoidable impact as summarized below... a project that follows the Secretary of the Interior's Standards for Rehabilitation, shall be considered as mitigated to a level of less-than-significant impact on the historical resource... alternative design considerations prepared by Painter Preservation that would ensure exterior alterations for the shopping center would be consistent with the Secretary of the Interior's Standards for Rehabilitation. However, no feasible mitigation was determined based on the applicant's objectives and proposed alterations and site improvements."

*It is not clear which of the impacts can be reduced and which cannot. What constitutes "most of the impacts"? As we discussed previously the conclusion seems to be there is no mitigation except the Secretary's Standards. But as we pointed out:*

*The DEIR does not discuss alternative mitigations, such as an on-site photo history of the MVC and Dahlstrand, which may reduce the impact to a less than significant level.*

*The DEIR does not examine the nexus or rough proportionality of the proposed mitigation in relation to the project's actual impact.*

Page 10-2:

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The DEIR states "While this alternative would not change the shopping center's ability to continue to operate as it currently does, this alternative would not permit the applicant to revitalize or modernize the shopping center as stated in the applicant's objectives. However, returning the shopping center to its baseline conditions would still allow for attracting new businesses, providing a local job base, and providing a range of businesses to local in one central location."

*The DEIR presents no evidence to support this conclusion. The DEIR contains no economic analysis which would support a conclusion that the MVC will attract business and provide jobs if it cannot evolve the use and look of the Center to meet the needs of today's competitive and rapidly changing business environment.*

*The letter from Norm Hulbert (Exhibit A) presented earlier makes a clear case that the MVC, if it cannot improve and somewhat re-invent itself will eventually fail.*

We hope you find these comments helpful and look forward to seeing the responses. Please call me if you have any questions.

Sincerely,

  
Anthony L. Lombardo



San Francisco Bay Area/Silicon Valley  
55 South Market Street, Suite 1210  
San Jose, CA 95113-1207  
408-279-1520 phone  
408-279-3428 fax

January 7, 2022

Norman C. Hulberg, MAI  
408-279-1520, ext. 7142  
nhulberg@valbridge.com

Dale Ellis  
Anthony Lombardo & Associates  
144 W. Gabilan Street  
Salinas, CA 93901

Re: Executive Summary  
Economic Impact of Proposed Historic District Designation  
Mid Valley Center, Carmel Valley, CA

Dear Mr. Ellis:

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As requested, we have prepared an analysis of the likely economic impact of an historic district designation on Mid Valley Center. Our report is attached.

This center is 54 years old and already in need of repositioning and remodeling. This should be no surprise; most centers of this age need remodeling.

Valbridge appraised this property in 2011, for the prior ownership. Nominal rents today are substantially lower than in 2011. Adding that CPI has changed by 26% since that date, the rental drop in "real" rates is dramatic.

Vacancy today is 11.4%. Without the sort of changes that would likely be blocked by a historic designation, we expect vacancy to accelerate. The attached analysis indicates a value drop of \$5 million over a short time. When vacancy becomes too great, the operation is no longer sustainable and needs to close.

Thanks for the opportunity to provide this study.

A handwritten signature in blue ink that reads 'Norman C. Hulberg'. The signature is written in a cursive, flowing style.

Norman C. Hulberg, MAI  
Senior Managing Director  
California Certified License #AG003542

**EXHIBIT A**



San Francisco Bay Area/Silicon Valley  
55 South Market Street, Suite 1210  
San Jose, CA 95113-1207  
408-279-1520 phone  
408-279-3428 fax

January 7, 2022

Norman C. Hulberg, MAI  
408-279-1520, ext. 7142  
nhulberg@valbridge.com

**VIA E-Mail Only**

Dale Ellis  
Anthony Lombardo & Associates  
144 W. Gabilan Street  
Salinas, CA 93901

Re: Evaluation of Proposed Historic District Designation  
Mid Valley Center  
Carmel Valley, CA

Dear Mr. Ellis:

As requested, we are pleased to provide an analysis of the likely impact of the proposed historic district designation on the economic viability of Mid Valley Center.

Our role in this analysis is not to appraise the property, nor is it to comment on the architectural merits of the center or the importance of the architect, Olof Dahlstrand. This is a general economic analysis. We are particularly mindful of the Monterey County Code 18.25.175 regarding "substantial financial hardship."

**Life Cycle of Neighborhood Shopping Centers**

As part of our study, we attempted to locate other properties or districts with a historic designation. We first sought to define the type of property represented by Mid Valley Center.

Shopping centers are generally classed based on size, measured in gross leasable area. As a general guideline, neighborhood shopping centers are the smallest, community centers are midsize, and regional centers are largest. Mid Valley Center has about 62,000 square feet of retail space, putting it in the neighborhood center category.

The second criterion for differentiating centers is the anchor tenant. A neighborhood center generally has only a supermarket anchor while a community center usually has a supermarket, a drug store, and perhaps a discount department store.

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**1.1 Characteristics of Shopping Centers**

Type of Center	Population Support Required	Leading Tenant (Basis for Classification)	Typical GLA (Square Feet)	General Range of GLA (Square Feet)	Usual Minimum Site Area (In Acres)
Convenience center		Minimarket	20,000	Up to 30,000	
Neighborhood center	3,000-40,000	Supermarket	60,000	30,000-100,000	3-10
Community center	40,000-150,000	Supermarket, drugstore, discount department store	180,000	100,000-400,000	10-30
Regional center	150,000 or more	One or two full-line department stores	600,000	300,000-900,000	10-60
Superregional center	300,000 or more	Three or more full-line department stores	1,000,000	600,000-2.0 million or more	15-100 or more

Source: Retail Development (Washington, D.C.: Urban Land Institute, 2008), 9.

There are some non-traditional centers not represented in the table above, including lifestyle centers, festival centers, entertainment centers, outlets, and discount centers. The Barnyard is an example of a non-traditional center.

It is noteworthy that the Urban Land Institute table above lists the population support required for a neighborhood center as 3,000 to 40,000. Carmel Valley had a population of just 4,407 as of the 2010 census, down from 4,700 at the 2000 census.

A historic designation would largely lock Mid Valley Center into its present appearance and configuration, but

Retailing has changed forever. Big-box stores and category killers . . . and the Internet are where today's consumers shop. The competition is fierce, and consumers want it all: low prices, endless variety, the latest designs, parking at the door and an environment so entertaining that they go there even when they don't need to shop! (*Ten Principles for Rebuilding Neighborhood Retail*, Urban Land Institute, 2003)

Mid Valley Center is now 54 years old. There is no one exact age that caps the potential life of a center. Obsolescence includes factors external to the property, including competition, demographics, and local economics. By the standard of most centers in this region, Mid Valley Center is nearing the end of its natural life, without renovation. Typically, significant changes are made to centers by age 50+.

Even within the center, we see internal obsolescence where the theater was converted to self-storage. The era of single-screen theaters ended soon after this project was built, transitioning to multiplexes, then Blockbuster (bankrupt in 2010), and now Netflix.

Increasingly, neighborhood centers are not places where retail goods are sold. E-commerce sales have risen from 11.3% in Q4 2019 to 14% in Q4 2020. The trend is obvious, even after accounting for what is surely above-typical online sales during the COVID-19 pandemic.

Neighborhood centers survive by providing services, as opposed to selling goods. This includes restaurants. Services cannot be ordered online and delivered by Amazon (yet). Indeed, our review of the tenant roster at

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Mid Valley Center indicates that Safeway and Ace Hardware are the only retailers left; all the other tenants are in the service industry.

### Competition

Mid Valley Center is somewhat insulated from competition as it has the only grocery store in the immediate neighborhood. During the quarantine, sales at Safeway were up as they were for virtually all grocery stores. But the loss of Safeway would be devastating to this center—or any neighborhood center. It is not true that Safeway is guaranteed to always stay. This is small grocery by modern standards with just 20,832 square feet, as compared with a Safeway modern average of double, at about 46,000 square feet.

Safeway has exercised their lease for another five years, beginning March 2022. Could they move? Yes, a viable option would seem to be Valley Hills Center, one-half mile west. Or perhaps a competitor would build there (Trader Joe's usually has 8,000 to 15,000 square feet; Whole Foods has about 36,000 square feet). Existing competition comes from outside of the mid-valley as nearly all residents pass by the larger and more modern Lucky's (Carmel Rancho Center) and Safeway at The Crossroads. For the retailers at Mid Valley Center, these other centers are current threats.

Later in this analysis, we will provide an example of the economic impact of a historic designation.

### Search for Historic-Designated Properties

In studying the impact of a specific constraint, such as a historic designation, it would in theory be ideal to evaluate the long-term viability of a property (or district) with an historic designation compared to a property unconstrained. To be meaningful, the properties should be as similar as possible.

We have conducted a nationwide search for neighborhood retail centers with a historic designation. We contacted over 400 appraisers and performed an internet search. We engaged historic preservation consultant Bonnie Bamburg of Urban Programmers to help find similar historic-designated properties. Ms. Bamburg searched a number of historic resources. It is noteworthy that, despite an extensive search, we were unable find any centers remotely similar to Mid Valley Center, constrained by a historic designation.

There are countless individual historic properties and sometimes streets. These are usually in older urban centers. Ms. Bamburg reported that in Monterey County there are over 200 properties listed on historic registers. Most are significant in California history, or they are residences. Some are commercial buildings.

Often, a historic property consists of a single iconic building, such as a bank, church, or theater. Our Valbridge office has appraised many such properties. Depending on their location and configuration, sometimes they can be adapted to a modern use; for example, a bank that becomes an office or restaurant. Theaters, with their sloped floors and lack of windows, present a special challenge. Many remain vacant for years. In California, in the past, many of these iconic properties were "rescued" by funding by "redevelopment agencies." However, former Governor Jerry Brown shut down the state's 400 redevelopment agencies in 2011.

The Burbank Theater in San Jose (552 and 560 South Bascom Avenue) is a recent example of a property lost in a time warp due to an historic designation. Built in 1949, the building developed a checkered history over the decades, showing arthouse films and most notoriously adult films from the 1970s to 2000, when it was shut down as a public nuisance. It was briefly a dance studio, then foreclosed in 1999. The property sold last

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month for \$1.6 million. The buyer's planned use is unknown. Were it not for the historic designation, the building would have surely been demolished and redeveloped years ago.



**Historic Burbank Theater, San Jose**

There are countless other examples where historic designation caused years-long delays and substantial economic impacts. Valbridge has appraised many such properties.

### Town & Country Village Centers

Having failed to find a neighborhood retail center similar to Mid Valley Center that is constrained by a historic designation, we turned to the closest analog: suburban retail centers constrained by active politics.

In the 1950s and '60s "Town & Country Village" shopping centers in the Bay Area were in Palo Alto, San Jose, Mill Valley, and Sunnyvale, all developed by Ron Williams. Except for in Palo Alto, all these centers were razed and redeveloped by the 1990s. Similar properties by other developers were redeveloped in Sacramento, Phoenix, and Los Angeles.

The Town & Country Village projects were similar to Mid Valley Center, built just a decade or two earlier. This is not to suggest that these properties are identical to Mid Valley Center; they are much larger in scale and better located. But they are similar to each other and tell a tale of obsolescence. And similar to Mid Valley Center in design.

All were low-slung buildings, surrounded by a sea of parking and mostly catering to small tenants—exactly as with Mid Valley Center. The original projects had floor area ratios on the order of 20-25%. Today, most well-located commercial projects have at least double that density. Often other uses are incorporated in the center, such as office, residential, and sometimes lodging.

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### San Jose Town & Country

Perhaps the most famous redevelopment was the Town & Country in San Jose, a 40-acre property. At the same time Mid Valley Center was developed, a 1965 directory of shops and services of San Jose's Town & Country Village described the shopping center this way:

Town & Country Village is a charming, rustic wonderland of the finest stores in Santa Clara Valley. The low, rambling architecture of the Village is suggestive of an early California hacienda. Tree-lined islands divide ample parking areas, just steps away from stores. Spanish tile roofs shelter wide sidewalks, inviting all-weather shopping.

The San Jose shopping center was 30%+ vacant and tired in appearance by 1997 when Federal Realty bought the property and replaced it with a 1.5 million-square-foot, mixed-use "lifestyle" development known as Santana Row. It is surely one of the most iconic redevelopment projects in the state, providing employment, generating millions in sales tax revenue annually, and driving customers to nearby businesses. The project pays annual property taxes of \$9,780,000.

At this time, Federal Realty is finalizing approvals for "Santana West," directly across Winchester Boulevard from Santana Row. This is mostly an office project. Santana West has its own historic tale, which includes the demolition of the Century 22 and 23 theaters. The first of the domed theaters, Century 21, was required to be retained. This theater surely resulted in an economic loss to the developer as this is a one-story theater. The balance of project will consist of 1 million square feet of office, including heights up to eight stories.

### Palo Alto Town & Country

In the absence of finding suburban shopping centers with an historic designation, we have considered an example of a shopping center that did not have a true historic designation but was "politically constrained." The best example is Palo Alto's 171,000-square-foot Town & Country shopping center, which is in a politically active, preservationist community.



**Palo Alto Town & Country, 1960s**

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Alone among the Town & Country projects, Palo Alto continues, with 70 mostly small shops. The center was built in the 1950s as a specialty retail shopping center, similar to the other Town & Country Villages. It had fallen into significant disrepair and vacancy by the time it was purchased by Ellis Partners in 2004. Ellis specializes in renovations of retail and commercial properties and also redeveloped Pruneyard Shopping Center in Campbell.

The renovation project ran into vociferous community opposition and ended up being scaled back. Still, the extent of what was done is far beyond what would likely be allowed at Mid Valley Center. The \$30 million in remodeling included addition of a Trader Joe's.



**Recent Photo, after \$30 million renovation and addition of Trader Joe's**

At this time, the center is nearly a third vacant. Sales are down 60-80%, in part reflecting the impact of COVID.

Even before COVID, the center was having trouble. Ellis petitioned the City to allow medical offices in the vacant spots. The proposal was for no more than 10% of the center. Medical uses would not have been allowed facing El Camino Real or Embarcadero. In June 2021, the City Council voted against allowing retail-oriented medical services.

As with this Palo Alto project, Mid Valley Center has many spaces with poor visibility.

While Palo Alto is not "historic" and has far fewer constraints than the presumable constraints of Mid Valley Center, the difference between it and the former Town & Country Villages in San Jose and Sunnyvale are stark. San Jose and Sunnyvale have been completely redone with a much higher floor area ratio and mix of uses.

## Value Impact of Historic Designation

We turn next to the economic impact of an historic designation. As discussed earlier, most neighborhood retail centers of the vintage of Mid Valley Center have either been renovated, razed, or are planned for major changes. The consequences of an inability to change with the times include:

- Decreasing occupancy rates
- Increase in lag time in signing leases, for example if a tenant has to go through a six-month process to get a sign approved
- Decreasing rents
- Lowering of tenant credit strength
- Diminished desirability of the property as an investment
- Loss of customers to competitors
- Decreased ability to obtain loans, whether for a purchase or renovation

We have compared two antiquated properties recently appraised by our office with more modern nearby retail centers to derive examples of differences in rent and occupancy.

Moonlite Shopping Center, at 2600 El Camino Real, Santa Clara, was built circa 1960 and contains 170,599 square feet of building area. The center is anchored by Save Mart Supermarket and Rite Aid. Typical rents in the center range between \$1.20 to \$2.37/square foot/month. The average is about \$2.00. The center is antiquated in appearance. **Actual rents are about 67% of prevailing rents in the immediate area.**

Another recent appraisal by our office was Lakewood Shopping Center, at 1119 Lawrence Expressway and 1037 Lakehaven Drive, Sunnyvale, built in 1959. The center is anchored by New Wing Yuan Market. Average in-line space rent at Lakewood Shopping Center is approximately \$2.00/square foot/month. Other shopping centers in the Sunnyvale area have typical in-line space rents of \$2.50 to \$3.50. **Actual rents are about 60% of prevailing market rent.**

There are countless examples of retail centers past their prime, with rents and occupancies less than modernized properties, even without historic constraints.

As an example of the potential value impact, we have prepared an example of a standard "income approach" used in appraising. Our template is the same as the one we used when we appraised Mid Valley Center for the previous owners in 2011. It is noteworthy that rents in the center today are substantially below the level of 11 years ago. The CPI index alone has increased 26% since that time. Thus, the financial performance of the center is nothing short of dismal. It is indeed in need of a facelift and repositioning.

In the following two tables we contrast two proformas: without a historic designation (assuming renovation of about \$1million) and with the historic constraint. The two schedules vary in this way:

- The historic scenario has rents of 20% less than the non-historic scenario. For simplicity, we begin with a retail vacancy rate of 10% level for this first set of analyses (p. 10 & 11) . The actual vacancy is now

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11.4%. There can be no doubt that over time vacancy will increase. Later in this letter we will evaluate the impact of increased vacancy over time.

- Capitalization rate increases by 200 basis points between the two scenarios. The "cap rate" is the ratio of net income to property value. Less desirable investments sell at higher cap rates. An investor would be concerned about gradual erosion of economic viability.
- The "non-history" scenario assumes \$1million in renovation in the near future.
- Neither of these analyses includes the service station parcel, which is comparatively de minimis.

**Income Approach: Non-Historic**

**Potential Gross Income**

Retail Rental Income	\$60,000 /mo. x 12	\$ 720,000
Storage Rental Income	\$12,000 /mo. x 12	\$ 144,000
Other Income (Storage Operation)		\$ 300
Scheduled Reimbursements (Reimbursed CAM Expenses)		\$260,000
<b>Total Potential Gross Income</b>		<b>\$ 1,124,300</b>

<b>Less Vacancy &amp; Collection Loss (10% for Retail)</b>		\$ 72,000
<b>Less Vacancy &amp; Collection Loss (18% for Storage)</b>		\$ 25,920

**Effective Gross Income (EGI)** \$ 1,026,380

**Less Unrecaptured CAM Expenses:** \$290,000

**Less Non-Reimbursable Expenses**

Non-reimbursable management (1% of EGI)	\$ 10,263.80
Reserves for entire center (2% of EGI)	<u>\$ 20,527.60</u>

**Total Non-Reimbursable Expenses** \$30,791.40

**Total Expenses:**

Total Expenses (31.3% of EGI) \$320,791

**Net Operating Income (NOI)** \$705,589

Divided by Capitalization Rate (7.00%) 7.00

**Leased Fee Value Indicated by the Income Approach** \$ 10,079,837

**Rounded to:** \$10,080,000

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**Income Approach: Historic Constrained**

**Potential Gross Income**

Retail Rental Income	\$48,000 /mo. x 12	\$ 576,000
Storage Rental Income	\$12,000 /mo. x 12	\$ 144,000
Other Income (Storage Operation)		\$ 300

Scheduled Reimbursements (Reimbursed CAM Expenses)		\$220,000
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**Total Potential Gross Income** **\$ 940,300**

**Less Vacancy & Collection Loss (10% for Retail)** \$ 57,600

**Less Vacancy & Collection Loss (18% for Storage)** \$ 25,920

**Effective Gross Income (EGI)** \$ 856,780

**Less Unrecaptured CAM Expenses:** \$300,000

**Less Non-Reimbursable Expenses**

Non-reimbursable management (1% of EGI) \$ 8,567.80

Reserves for entire center (2% of EGI) \$ 17,135.60

**Total Non-Reimbursable Expenses** \$25,703.40

**Total Expenses:**

Total Expenses (38% of EGI) \$325,703

**Net Operating Income (NOI)** \$531,077

Divided by Capitalization Rate (9.00%) 9.00

**Leased Fee Value Indicated by the Income Approach** **\$ 5,900,851**

**Rounded to:** **\$5,901,000**

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The unconstrained scenario reflects a value of \$10,080,000; however, it is necessary to spend about \$1million to renovate the property. Thus, for comparison purposes we should view the unconstrained value as \$9,080,000. This compares with the historic scenario of \$5,901,000, a difference of \$3,179,000.

Certainly, there are many alternative possible analyses, and this is not a true appraisal, but it is easy to see that an aging center is a recipe for economic loss.

So, the above comparison is between what can be considered "before" and "after," in other words, before the historic designation and after. In time, there is no doubt that the vacancy rate will increase. To illustrate the erosion of value over time, we prepared an analysis similar to the preceding table but with vacancy increasing in increments of 10%. This 10% equates to an average loss of 5,700 square feet per year. Only the conclusions are listed below with hypothetical years. Of course, the exact year these impacts hit will depend on a lot of factors, including competition and the local and national economies. Significantly, the next Safeway rollover is in 2027. If Safeway does not renew its lease, 39% of the total building would rollover. Surely, many small tenants would leave, and vacancy would be far above 50%.

In the table below, we treat the preceding analysis as representing Year 2. In other words, two years from now.

**Impact of Increasing Vacancy Due to Historic Designation**

Year	2	3	4	5	6
Vacancy	10%	20%	30%	40%	50%
NOI	\$531,077	\$495,491	\$459,781	\$424,018	\$388,616
Cap Rate	9.0	9.0	9.0	9.0	9.0
Value	\$5,901,000	\$5,505,522	\$5,108,000	\$4,711,311	\$4,317,955

We did not run the analysis beyond Year 6 because at that point it is likely the entire operation would collapse, from an economic point of view. Recall that the non-historic value was \$9,080,000 (net of \$1M renovation). By Year 6 over half the value has been lost.

A center with plummeting occupancy has plummeting rental rates. The owner is less incentivized to invest in the center; operating expenses overwhelm the paltry gross income and the center closes. For Mid Valley, the property does have a general plan overlay of affordable housing, and it would likely be necessary to pursue such a redevelopment. Of course, with an historic designation, there would be a long process necessary to be able to demolish the center. We would, however, expect that eventually such approval would be granted, rather than leaving a decrepit, vacant center in place.

The reader is reminded that in Years 2-6 in the above table the only change was the vacancy rate. We did not decrease the rent. In the face of escalating vacancy, it is nearly assured that management would be forced to lower rents to "whatever they could get." The cap rate would increase, as the desirability of the investment plummets. Thus, we believe the value erosion above to be conservative. Again, this is not an appraisal; a number of simplifying assumptions have been made.

In conclusion, change is constant in retail centers. Competitors emerge, consumer tastes change, designs change. It is unheard of for a retail center to remain locked in design without suffering economically. We believe Mid Valley Center would be significantly impacted were it to be placed in an historic district.

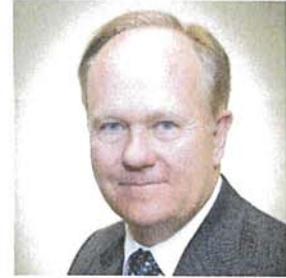
Dale Ellis, Esq.  
January 7, 2022  
Page 12 of 15

A handwritten signature in blue ink that reads "Norman C. Hulberg". The signature is written in a cursive, flowing style.

Norman C. Hulberg, MAI  
Senior Managing Director  
California Certified License #AG003542

## Qualifications of Norman C. Hulberg, MAI Senior Managing Director

Valbridge Property Advisors | Northern California



### *Independent Valuations for a Variable World*

#### State Certifications

Certified General  
State of California

#### Education

Masters Degree  
Business Administration  
San Jose State University

Bachelor of Science  
Real Estate  
San Jose State University

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#### Membership/Affiliations

Member: Appraisal Institute – MAI Designation  
Member: Association of Independent Office Parks  
Member: Rotary Club of San Jose/Board of Directors  
Member: Santa Clara County Estate Planning Council

#### Appraisal Institute & Related Courses

Continuing education courses taken through the Appraisal Institute and other real estate organizations.

#### Experience

##### Senior Managing Director

Valbridge Property Advisors | Northern California (2013-Present)

##### President

Hulberg & Associates, Inc. (1976-2013) (joined to create Valbridge in 2013)

Appraisal/valuation and consulting assignments include: Single-family, condominium, apartments, land, mobile home parks. Office buildings, hotels/motels, service stations, retail, vacant land. Industrial plants, research and development, warehouses, data centers. Fractional interest valuations, contaminated properties, special purpose properties, feasibility studies, market studies, condemnation, construction defects, litigation support, mediations, arbitrations and review appraisals.

Mr. Hulberg has provided valuation services in a wide variety of complex civil litigation including real estate, land use cases, condemnation, estate matters, property taxation, contract disputes, partnership and corporate disputes, environmental lawsuits, professional negligence cases, construction defect, and bankruptcy/creditors matters.

Qualified as an expert witness in most counties in the San Francisco and Monterey Bay and Central Valley areas, as well as and in the U.S. Tax Court in the U.S. District Courts in San Jose, San Francisco, Oakland, and Las Vegas. He is a highly experienced forensic appraiser, having provided testimony on over 300 occasions. This includes over 100 jury trials in state and federal courts in addition to numerous court trials. He has also testified in major arbitrations and before state and federal courts, as well as private arbitrations.

**STANDARD TERMS OF CONSULTING ASSIGNMENT**

1. Acceptance of this agreement assumes that our client will provide all necessary information needed for the assignment on a timely and truthful basis, and assumes that the client will provide sufficient access to the property to be appraised. A delay in receipt of information may delay completion of the assignment.
2. The fee quoted is based on our understanding of the assignment as outlined in the scope of work. Changes in scope will be billed at our normal hourly rates. If any employee of Valbridge | Hulberg is asked or required to appear and/or testify at any meeting, deposition, trial, or other proceeding about the preparation, conclusions, or agreement, client shall compensate employee for the time spent in appearing and/or testifying and in preparing to testify according to the employee's then current hourly rate, plus expenses.
3. The fee and estimated completion time are subject to change if the property is not as outlined in our proposal, or if issues come to light during the course of our investigation which, in our opinion, necessitate such change. If the client places an assignment "on hold," then reactivates the assignment, an additional charge may apply due to inefficiency created.
4. The Valbridge Property Advisors office responsible for the preparation of this report is independently owned and operated by Hulberg & Associates, Inc. Neither Valbridge Property Advisors, Inc. nor any of its affiliates has been engaged to provide this report. Valbridge Property Advisors, Inc. does not provide evaluation services, and has taken no part in the preparation of this report.
5. If any claim is filed against any of Valbridge Property Advisors, Inc. a Florida Corporation, its affiliates, officers or employees, or the firm providing this report, in connection with, or in any way arising out of, or relating to, this report, or the engagement of the firm providing this report, then (1) under no circumstances shall such claimant be entitled to consequential, special or other damages, except only for direct compensatory damages and (2) the maximum amount of such compensatory damages recoverable by such claimant shall be the amount actually received by the firm engaged to provide this report.
6. This report and any associated work files may be subject to evaluation by Valbridge Property Advisors, Inc. for quality control purposes. If Client is unwilling to waive confidentiality for this purpose, client must inform Valbridge | Hulberg upon acceptance of this assignment.
7. Should the assignment be terminated prior to completion, you agree to pay for time and costs incurred prior to our receipt of written notice of cancellation. If this assignment includes a provision for work performed on an hourly billing basis, such work is subject to periodic adjustment to our then-current rates. Valbridge | Hulberg shall provide 30 days' notice to client prior to any rate increase. If client chooses not to consent to the increased rates, client may terminate Valbridge | Hulberg's services by written notice effective when received by Valbridge | Hulberg.

8. You and Valbridge | Hulberg both agree that any dispute over matters in excess of \$5,000 will be submitted for resolution by arbitration. This includes fee disputes and any claim of malpractice. The arbitrator shall be mutually selected. If Valbridge | Hulberg and the client cannot agree on the arbitrator, the presiding head of the Santa Clara County Mediation & Arbitration panel shall select the arbitrator. Such arbitration shall be binding and final. In agreeing to arbitration, we both acknowledge that, by agreeing to binding arbitration, each of us is giving up the right to have the dispute decided in a court of law before a judge or jury. In the event that the client, or any other party, makes a claim against Hulberg or any of its employees in connection with or in any way relating to this assignment, the maximum damages recoverable from Valbridge | Hulberg or its employees shall be the amount of monies actually collected by Valbridge | Hulberg for this assignment, and under no circumstances shall any claim for consequential damages be made.
9. Valbridge | hulberg shall have no obligation, liability, or accountability to any third party. Any party who is not the "client" or intended user identified on the face of the assignment or in the engagement letter is not entitled to rely upon the contents of the report without the express written consent of Valbridge | Hulberg. "client" shall not include partners, affiliates or relatives of the party named in the engagement letter. Client shall hold Valbridge | Hulberg and its employees harmless in the event of any lawsuit brought by any third party, lender, partner or part owner in any form of ownership or any other party as a result of this assignment. The client also agrees that in case of lawsuit arising from or in any way involving these appraisal services, client will hold Valbridge | Hulberg harmless from and against any liability, loss, cost or expense incurred or suffered by Valbridge | Hulberg in such action, regardless of its outcome.
10. Distribution of this report is at the sole discretion of the client, but no third parties not listed as an intended user on the face of the assignment or engagement letter may rely upon the contents of the report. In no event shall client give a third party a partial copy of the report. We will make no distribution of the report without the specific direction of the client.
11. This agreement contains the entire agreement of the parties. No other agreement, statement or promise made on or before the effective date of this agreement will be binding on the parties. This agreement may only be modified by subsequent agreement of the parties.

Executive Summary  
Carmel Valley / Mid Valley Shopping Center  
9550 Carmel Valley Road, Carmel, County of Monterey  
Olof Dahlstrand, Architect; completed 1966 - 1967  
Lack of Eligibility, Criterion C, National Register of Historic Places  
April 2021

41 | **Criterion C:** *The property must embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction.*

a. The Center does not “*embody the distinctive characteristics of a type, period, or method of construction.*” It blends a number of styles from various sources and time periods. Its construction, combining concrete, heavy timbers, exposed aggregate, and wood shake roof is common in commercial work.

42 | b. The Center does not “*represent the work of a master.*” While Olof Dahlstrand was a locally respected architect and acknowledged in Carmel and Monterey County, as analyzed according to National Register Bulletin 15, federal General Services Administration tools for evaluating Modernist buildings, and other sources named in the various evaluations, Mr. Dahlstrand is not a “*figure of generally recognized greatness in a field.*” His work was not published widely at the state or national levels, it did not have an impact on the architecture profession, and it did not influence its wider direction. The Center was not a formative or pivotal design in his career nor has it had an important impact on the Carmel community.

43 | c. The Center does not “*possess high artistic values.*” The National Register requires that a property possess *high* artistic values in order to be eligible for designation. While the Carmel Valley Shopping Center is a good example of Mr. Dahlstrand’s work, it is not an outstanding or innovative expression of Modernist ideals or values. Its low, broad, wood shake roofs and deep overhangs are old and familiar features on the Peninsula and Carmel, from Julia Morgan’s iconic Asilomar, 1913, to the area’s rustic vernacular architecture set amidst woods and pines. Thus, these features are not “Modern,” as characterized in other reports, which also associated such features as primarily inspired by Frank Lloyd Wright, instead of looking at the obvious regional sources close to hand. Furthermore, the Center appears to be derivative of the nearby Del Monte Shopping Center, designed by master architect John Carl Warnecke FAIA and built in 1967. Mr. Dahlstrand’s own records note that he did renderings of the Del Monte complex for Warnecke in 1960 and in 1964, and the two centers strongly resemble one another. With its buildings wrapping around a large parking lot, the Carmel Valley Shopping Center’s plan follows a common paradigm for postwar suburban shopping centers. It does not demonstrate a new and thoughtful approach to addressing the pedestrian along with the car – as does the Del Monte center, whose “corridor” of varied landscapes champions pedestrians while relegating cars to the perimeter.

44 | d. The Center does not “*represent a significant and distinguishable entity whose components may lack individual distinction.*” Per National Register Bulletin 15, this section of Criterion C refers to districts. The Carmel Valley Shopping Center is *not* a historic district, as has been argued in a previous evaluation. A historic district is usually interpreted as a group of buildings that are perhaps constructed at different times by varied persons but are all related by a common theme. Designed by one person, at one time, as a holistic design, the Carmel Valley Shopping Center is a single property with multiple buildings.

45 | **In conclusion**, the Carmel Valley Shopping Center fails to meet any of the thresholds required for listing in the National Register of Historic Places.

Notably, while the Center does not appear to be eligible for designation, none of its buildings, rooflines, and materials are being demolished. It will remain a familiar part of the community, enhanced by sensitive renovations, new retail opportunities, and more community involvement.

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April 2021

Brandon Swanson  
Interim RMA Chief of Planning  
Monterey County Resource Management Agency  
1441 Schilling Place  
Salinas, CA 93921

RE: **Letter of Memorandum, Carmel Valley (Mid Valley) Shopping Center**  
**9550 Carmel Valley Road, Carmel Valley**  
**APNs 169-234-007-000, 169-234-008-000**  
**Planning Area: Carmel Valley Master Plan**

Dear Mr. Swanson,

46

On behalf of The Stanley Properties, I was asked to review the findings regarding the 6.5-acre Carmel Valley Shopping Center, primarily completed in 1967. As a qualified architectural historian, I was also asked to provide an evaluation of the property's eligibility for designation in consideration of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), and Monterey County Local Register of Historic Resources and its status as a historical resource under the California Environmental Quality Act (CEQA) § 21084.1, and CEQA Guidelines section 15064.5. There have been four architectural historians involved with this project, each submitting reports, evaluations, and letters.

The property is variously called the Carmel Valley Shopping Center, its original name, and more recently the Mid Valley Shopping Center; throughout this report it is referred to as the Mid Valley / Carmel Valley Shopping Center to avoid any confusion.

### **Purpose of this Letter of Memorandum**

These previously submitted documents contain much background data, extensive descriptions of the property, considerations of Olof Dahlstrand's (1916 – 2014) prominence as an architect, and assessments of the property's significance and integrity. Rather than reiterate this material, the objective here is to concisely lay out the principle arguments for my own finding, that the subject property does not meet the requirements for designation under Criterion C, architecture, the National Register of Historic Places, Bulletin 15.<sup>1</sup> This assessment concurs with those of qualified architectural historians Dr. Anthony Kirk and Dr. Laura Jones, Director of Heritage Services, Stanford University.

### **Consultant Qualifications**

To ensure an objective and professional evaluation, cultural resource studies are typically carried out by specialists for the relevant field of study, in this case architectural history. The standards for such specialists

<sup>1</sup> The California Register's criteria for designation, 1 – 4, are patterned after the National Registers letters A – D, which will be used here with the understanding that eligibility for the latter extends to the former.

*Letter of Memorandum, Carmel Valley Shopping Center / Mid Valley Shopping Center, The Stanley Properties, 1  
March 2021, Dr. Barbara Lamprecht*

# EXHIBIT C

46 cont.

are designed to ensure the study's quality in following established criteria for consideration. I am a qualified architectural historian meeting and exceeding the Secretary of the Interior's Professional Standards and the National Park Service professional qualifications (36 CFR Part 61.) These qualifications include an M.Arch., California State Polytechnic University and a Ph.D. in Architecture, University of Liverpool; numerous EIR reports, successful NRHP and local nominations for historic designations; and project management for commercial, civic, and private rehabilitations under the Secretary of the Interior Standards for Rehabilitation. Apart from my professional work, I am a scholar of the work of Modernist architect Richard Neutra and other postwar architects. For further reference, please see my attached CV. It is my goal here is to arrive at a conclusion based not on personal bias but on established thresholds, my professional code of ethics, and sensible interpretation. My c.v. is attached.

47

### Regulatory Setting

At the federal and state levels, the criteria to assess a property based on architectural concerns are the NRHP's Criterion C and the CRHR's Criterion 3. Both address design and construction.

At the regional/local level, pertinent **County of Monterey** criteria, repeated here in full, are

**A. 5** The resource or district proposed for designation represents the work of a master builder, engineer, designer, artist, or architect whose talent influenced a particular architectural style or way of life.

**C. 1** The proposed resource materially benefits the historic character of the community

**C. 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 the county.

In its entirety, the National Register's Bulletin 15 **Criterion C** states that a property must:

*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.*

Under the portion of Criterion C referring to a master, the Bulletin qualifies which works of a master are eligible:

*The property must express a particular phase in the development of the master's career, an aspect of his or her work, or a particular idea or theme in his or her craft. A property is not eligible as the work of a master, however, simply because it was designed by a prominent architect. For example, not every building designed by Frank Lloyd Wright is eligible under this portion of Criterion C, although it might meet other portions of the Criterion, for instance as a representative of the Prairie style."<sup>2</sup>*

In other words, in addition to being designed by a Master, to be eligible a property must also express something notable in the architect's oeuvre – some sort of milestone, to have had an “impact on their

<sup>2</sup> [https://www.nps.gov/subjects/nationalregister/upload/NRB-15\\_web508.pdf](https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf), p. 20.

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47 cont.

careers or the profession.”<sup>3</sup> For example, Wright’s Robie House, Chicago, 1910; Falling Water, Bear Run, Pennsylvania, 1937; his Usonian designs of some sixty houses of the 1930s, ‘40s, and ‘50s; and the Guggenheim Museum, New York, 1959, were all were pivotal projects in Wright’s career and additionally were profoundly influential in the world of architecture, extensively written about and publicized in many books, articles, and scholarly papers.

Just as National Register qualifies the work of a master as needing to be a particular kind of milestone in the master’s oeuvre, some other agencies also qualify their definitions. The Historic Landmark criteria for the City of Beverly Hills, for example, requires not only that a resource possess high artistic or aesthetic value, but it also must be an “exceptional” work by a master. Along the same lines, the County of Monterey qualifies its definition of master with a tall order: a building must be not only by a great (“master”) architect, but they must be one “whose talent influenced a particular architectural style or way of life.”

48

## Existing Reports and Findings

Prepared by four different architectural historians, there have been five major evaluations and other letters related to the project. The five major reports are:

1. Sept. 9, 2019. An evaluation of the Center by Dr. Anthony Kirk, for The Stanley Properties
2. Nov. 19, 2019. A Phase One Historic Assessment with DPR 523A and 523B form prepared by Page & Turnbull for the Carmel Valley Association
3. Oct. 16, 2020. A report by Dr. Laura Jones, Heritage Resources Consulting, for The Stanley Properties
4. Nov. 4, 2020. A second Assessment Report by Dr. Kirk for The Stanley Properties
5. Dec. 21, 2020. A Historic Resource Evaluation/Phase I Assessment by Painter Preservation requested by the County of Monterey and funded by The Stanley Properties

49a

## Previous Significance Statements finding the Center eligible under Criterion C

### Page & Turnbull

*“The Mid Valley Shopping Center appears to be individually eligible under Criterion C/3 (Architecture) for its association with locally prominent architect, Olof Dahlstrand. The shopping center exemplifies Dahlstrand’s use of form and material in a Wrightian-inspired design that respects the features of its surrounding natural environment. Though an undoubtedly commercial complex, Frank Lloyd Wright’s influences can be seen in the use of naturalistic materials and dramatic roof lines echoing the surrounding hill slopes. Further, it is a unique example of the application of the architect’s work to a large suburban commercial complex, with integrated vehicle parking and circulation in addition to pedestrian walkways and courtyards. Most of Dahlstrand’s work consisted of individual residential and commercial buildings. In contrast, this appears to be one of only two shopping centers designed by the architect. The other, Carmel Plaza, represents a more urban location designed for a primarily pedestrian clientele. While the multi-building courtyard style of the*

<sup>3</sup> Ibid., p. 54.

49a cont. | *Mid Valley Shopping Center echoes the courtyards typical of Carmel's other commercial areas, Dahlstrand incorporated the parking needs of an increasingly suburban residential population in Carmel Valley ... "*

49b | **Painter Preservation**  
*"It is significant for its design and as the first shopping center in the Carmel Valley to exhibit a cohesive, comprehensive modern architectural expression that also retains integrity. It displays a level of sophistication not previously seen in shopping center design in the valley. It is also the only shopping center designed in the Organic style, one of the hallmark styles in Carmel-by-the-Sea and the Carmel Valley, noted in the two previous historic context statements for Carmel-by-the-Sea and Carmel Valley as characteristic, but nonetheless not common in commercial retail design. Finally, it is significant for its association with architect Olof Dahlstrand, a highly respected architect in Carmel and the larger Bay Area, whose work has been widely published."*

49c | **Summary Response to the Page & Turnbull and Painter Preservation findings:**  
For both reports it is not clear under which aspect of Criterion C each significance statement is responding to. Both imply that Olof Dahlstrand is a "master" architect because of the Center's association with him as "locally prominent" (Page & Turnbull) or "highly respected" (Painter Preservation.) Both suggest that the Center is special in that it is unusually sophisticated for a shopping design in the Valley; however, not only it is the only suburban shopping center in Carmel Valley, but its layout of buildings also fronted by a large parking lot is an omnipresent postwar template for shopping centers.

49d | This evaluation does not find the shopping center to meet the thresholds established by Criteria A or C. The Mid Valley Shopping Center is not exceptional in demonstrating "high artistic values"; rather, the Center's design relies on precedents established by others. It does not demonstrate a "high level of sophistication" as does the nearby Del Monte Shopping Center designed by master architect John Carl Warnecke FAIA or other postwar/mid-century shopping centers. Arguably, the CVSC embodies not "Wrightian" features or the ill-defined "Organic" style but rather references features characteristic of the surrounding built context, from Asilomar and versions of domestic postwar Ranch architecture to the ubiquitous rustic, "natural" character of the Peninsula's vernacular architecture. Likewise, the reports do not show that Dahlstrand was a "master architect." He was a fine architect as evidenced by his outstanding Wells Fargo bank on San Carlos Street and Ocean in Carmel-By-The-Sea, which is worthy of consideration for designation. Clearly a devotee of the work of Frank Lloyd Wright as seen in his residential work, such an influence of the "Wrightian Organic" style on the shopping center is weakly justified here and is in any case not relevant. Dahlstrand's work has not been "widely published," his work is not widely influential; the Center does not reflect a particularly important phase of his career, and indeed he appears to have been not well known even in the local architectural community of the day. Finally, this evaluation considers the subject property, designed by one architect at one time in one style and constructed altogether, not as a historic district as evaluated in the Painter Preservation report, but simply a complex with multiple buildings.

This report will step through the NR criteria in order to elaborate this finding.

50 | **Applying the Criteria**  
**1. Introduction – Discussion of "Master" architect**

To recall, since the 16<sup>th</sup> century, the definition of "architect" has been defined as a "person skilled in the art of building, one who plans and designs buildings and supervises construction." Essentially, an architect is a choreographer who coordinates every aspect of a design, often collaborating with other colleagues and specialists such as renderers or engineers as needed. A "master" is all that and more.

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50 cont.

Per National Register Bulletin 15, a *master architect* is

*“... a figure of generally recognized greatness in a field ...”*

California’s Office of Historic Preservation has no guidance for the definition of a “master” other than that provided above.

Note that the language refers to “greatness.” How is greatness measured? Essentially, a “master architect” adds something—an innovation, some new method, idea, approach—to the discourse of architecture. That is, an element that is special, enduring, and recognized. Examples of master architects include:

- . Julia Morgan, who was mentored by Bernard Maybeck
- . William Wurster, who was mentored by Maybeck
- . Frank Lloyd Wright, who worked for the great nineteenth-century Chicago architect Louis Sullivan
- . Irving Gill, who worked under both Sullivan and Wright
- . John Lautner, who apprenticed with Wright
- . Helena Araheute, who worked for John Lautner
- . Albert Frey, the Swiss-American, Palm Springs-based architect, who worked for Le Corbusier
- . Richard Neutra and Rudolf Schindler, who both studied under Adolf Loos in Vienna

There are many other examples of such masters who studied and worked for others, but critically, all went on to make contributions to the profession and to humanity that were also distinctly individual.

Clearly there is a fine line between a Master and an excellent architect. Because it is often a subjective assessment, it calls for a framework for a more objective evaluation. However, as no such comprehensive framework exists, this evaluation is based on many sources, including:

- . The National Register’s definition, cited above
- . Appearances and discussions in data bases and historic context reports
- . The American Institute of Architects (AIA) criteria for the prestigious title Fellow, with outstanding, distinguished or lasting contributions in one of five categories:<sup>4</sup>
  - a. design, urban design or preservation
  - b. education, research literature, or practice
  - c. led the AIA or related organization
  - d. public service, government, industry, or organization
  - e. alternative career, volunteer work, or service to society
- . Broad recognition by the public
- . Respect of peers, demonstrated in professional recognitions and awards
- . Buildings landmarked or eligible for designation

<sup>4</sup> <https://www.aia.org/awards/7076-fellowship>

. Notable public service

51a Other valuable references include insights from peer professionals in evaluating a Master; the federal report, "Work of a Master?" prepared for the Department of Defense (DOD);<sup>5</sup> the General Services Administration's "Eligibility Assessment Tool" for Modernist resources;<sup>6</sup> the City of Beverly Hills definition of a master and accompanying requirements; and other regional sources such as guidelines prepared for City of Palo Alto city planners evaluating resources within the Stanford Research Park.<sup>7</sup>

#### Evaluating Olof Dahlstrand as a Master Architect.

##### Data Bases

Olof Dahlstrand is not noted in the Pacific Coast Architecture Data Base (PCAD), a directory of architects and buildings that is often the first place to check when researching an architect. Developed in 2002, its intent is "to create a biographical dictionary for relatively unknown and unheralded designers who participated in developing California's built environment, utilizing the capabilities of the internet to make this information available to the public." This list of "unknown and unheralded designers" does not include Dahlstrand.

51b Dahlstrand is not noted in the American Architects Directory of the AIA, which includes non-members.

51c *USModernist*, considered the largest open digital database for Modernist residential design in the U.S., has an extensive listing of influential Modernists in its "Masters Gallery." Dahlstrand is not listed.<sup>8</sup>

##### Archives

51d University of California, Berkeley's Environmental Design Archives (Berkeley EDA) contains Dahlstrand's papers; the inclusion of the "Dahlstrand Collection" in this highly selective repository indicates that his work is considered worthy of preservation and study and that he was a significant architect in the Bay Area.<sup>9</sup>

##### Publications/Presentations

51e The Page & Turnbull report notes that "the 1976 publication *Architecture of the Monterey Peninsula*, published by the Monterey Peninsula Museum of Art, includes Dahlstrand and his design for the Dodds Residence in its compendium of architects whose work in the area was influenced by Frank Lloyd Wright."<sup>10</sup> Dahlstrand is also named as one of the practitioners "following the Wright style" in a lengthy newspaper article in the *Carmel Pine Cone* related to the exhibition.<sup>11</sup>

<sup>5</sup> Rand Herbert and Joseph Freeman, JRP Historical Consulting, LLC, "Work of a Master? Addressing Evaluation of Routine or Prosaic Architecture by Famous Architects on Military Facilities," for the U.S. Department of Defense Legacy Resource Management Program, February 2017.

<sup>6</sup> GSA Eligibility Assessment Tool, Special Insert 20, <https://www.gsa.gov/cdnstatic/EligibilityTool.pdf>

<sup>7</sup> Hillary Gitelman, "Stanford Research Park Framework Document Presentation

<sup>8</sup> <https://usmodernist.org/masters.html>

<sup>9</sup> <https://archives.ced.berkeley.edu/collections/dahlstrand-olof>

<sup>10</sup> Page & Turnbull, Phase One Historic Assessment with DPR 523A and 523B forms, for the Carmel Valley Association. Nov. 19, 2019, p. 38, citing Monterey Peninsula Museum of Art, *Architecture of the Monterey Peninsula* (Monterey, 1975), 77.

<sup>11</sup> Irene Gaasch, "Peninsula Architecture: Man and the Elements Combined," *Carmel Pine Cone*, April 22, 1976.

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51f

Dahlstrand is noted three times in *NorCalMod: Icons of Northern California Modernism* (Chronicle Books, 2006) written by architect, architectural historian, and scholar of Northern California Modernism Pierluigi Serraino, who interviewed Dahlstrand in 2003 as one of the Bay Area architects practicing Modern architecture in mid-century. Serraino's goal was to recast Modernism as interpreted by Northern California architects and to illuminate the little-known or unknown contributions of these individuals. However, by contrast to many other such prominent and lesser-known architects whose work is included in photographs and discussed in the text, the book does not include any photographs of work by Dahlstrand, his contributions are not discussed, and he is not included in the 36 pictorial biographies of architects and two photographers included at the end of the book.<sup>12</sup>

Dahlstrand's work "has been recognized as part of the larger body of Modernist architecture of the Monterey Bay area, included in presentations by Serraino's March 2019 lecture series for the Monterey Bay Chapter of the American Institute of Architects, 'Which Modernism is the Monterey Bay?' and historian Kent Seavey's *Carmel: A History in Architecture*."<sup>13</sup>

*Olof Dahlstrand: The Usonian*, 2007, Brook House Press, was written by Bill [sic] and Bea Welty. The self-published, 72-page book, focuses on the seven "Usonian" houses designed by Olof Dahlstrand between 1951 and 1958 (the first one, the Muscatine Residence, was designed by Dahlstrand's employer at the time, Fred and Lois Langhorst Architects; Dahlstrand was responsible for two additions.) Notably, the designs for the Dahlstrand "Usonian" (a pioneering concept developed by Wright in the late '1930s and '40s on behalf of middle-class owners in search of good design at a more modest price) follow Wright's work closely, using several identical details including Wright's famous 30-60 degree angles and triangles for defining spaces, horizontally oriented wide wood batten siding, mitred windows, textured concrete block, interior soffit lighting, angled concrete block fireplaces, and furniture design. While clearly inspired by Wright, both Page & Turnbull's and Painter Preservation reports suggest that Dahlstrand had a close connection to his hero, however, it appears that Dahlstrand never apprenticed or worked for Wright.

The occasional article and announcement on Dahlstrand were more likely to highlight his homes; a few articles on his commercial work appeared in local newspapers and rarely in national publications:

- . "Downtown Center for an Unusual West Coast Town," *Architectural Record*, June 1962
- . "Making it Fun to Shop," *Redwood News*, January 1963
- . A 2008 article in *SF Gate* titled "Work of Modernist Olof Dahlstrand Revisited in the East Bay. Here, architectural historian Serraino notes that Dahlstrand's work has a "strong Wrightian influence, but they are not totally derivative." The article's author, Joanne Furio, also notes that "one of the ways that Dahlstrand distinguished himself was through the use of sliding doors

<sup>12</sup> Pierluigi Serraino, *NorCalMod: Icons of Northern California Modernism* (San Francisco: Chronicle Books, 2006.) Dahlstrand is noted briefly on pp. 20, 59, 79.

<sup>13</sup> Page & Turnbull, *ibid.*, citing Kent Seavey, *Carmel: A History in Architecture* (San Francisco: Arcadia Publishing, 2007), 113.

51f cont.

between children's bedrooms."<sup>14</sup> However, such sliding doors to change spatial relationships have been used in Modern architecture since the early 20<sup>th</sup> century: Le Corbusier's Houses 14 and 15 for the Weissenhof Siedlung, Frankfurt, 1927, is a famous example, as are single-family houses designed by Pasadena-based Buff, Straub and Hensman or Los Angeles-based Richard Neutra among many other architects who were responding to new requirements in postwar suburban houses whose inhabitants contained children but no servants.

51g

Dahlstrand wrote no books on architecture and is not noted in prominent architectural magazines of the day such as *Sunset* or *arts & architecture*.

### Historic Context Statements

51h

1. Dahlstrand is noted in the City of San Francisco's "Modern Design Historic Context Statement Case Report," 2011, as among a group of architects considered key to the development of a regional Modern style<sup>15</sup> and again in association with Fred and Lois Langhorst, who were among the:

*Bay Area's prominent young Modernist architects renowned for inventive Second Bay Tradition residential designs. The works of the San Francisco-based firm were the first of local architects to be featured at the San Francisco Museum of Art, including the 1950 exhibit "Variation Within a Concept: Fred and Lois Langhorst & Olaf Dahlstrand" ...<sup>16</sup>*

2. Dahlstrand is noted in the "Carmel Historic Context Statement," 2011, updated in 2019, as a practitioner of the "Wrightian Organic style, which is "not entirely different in principle from Bay Regionalism." He was "influenced by Wrightian methods" characterized by "dramatic roof forms sheltering buildings constructed of natural materials."<sup>17</sup> In the 2019 update, Dahlstrand is listed among the list of "Significant Carmel Area Architects," which includes a short biography.<sup>18</sup> The text to this biography emphasizes not only his architecture but also his skills as a renderer and his many years of public service to Carmel (elaborated later in this report):

*Olof (sometimes spelled Olaf) Dahlstrand (1916 – 2014) was born in Wisconsin and studied architecture at Cornell University, graduating in 1939. He designed buildings as a defense contractor during World War II and moved from the Midwest to California in 1948. He settled in Carmel around 1959. With a lifelong talent for drawing, Dahlstrand not only designed and drew his own buildings but was commissioned for renderings by other architects, most famously for John Carl Warnecke's design for the John F. Kennedy gravesite presentation.<sup>19</sup>*

<sup>14</sup> Joanne Furio, "Work of Modernist Olof Dahlstrand Revisited in the East Bay," *SFGATE*, Jan. 9, 2008, updated Feb. 11, 2012, <https://www.sfgate.com/homeandgarden/article/Work-of-modernist-Olof-Dahlstrand-revisited-in-3298433.php>

<sup>15</sup> Mary Brown, "San Francisco Modern Architecture and Landscape Design Historic Context Statement 1935 – 1970," San Francisco Planning Department, 2011, p. 213.

<sup>16</sup> *Ibid.*, p. 248.

<sup>17</sup> Teresa Grimes and Leslie Heumann, Leslie Heumann and Associates, 1994; revised by Glory Anne Laffey, *Archives and Architecture*, 1997, "Historic Context Statement Carmel-By-The-Sea," adopted by City Council, Carmel 2008, p. 48. See also Section 9.6, where Dahlstrand's name is listed under "Architects, Builders, and Designers in Carmel." [https://ci.carmel.ca.us/sites/main/files/file-attachments/final\\_updated\\_carmel\\_historic\\_context\\_statement\\_091208-b.pdf?1510262312](https://ci.carmel.ca.us/sites/main/files/file-attachments/final_updated_carmel_historic_context_statement_091208-b.pdf?1510262312)

<sup>18</sup> Historic Context Statement Update, 1966 – 1990, Carmel-by-the-Sea, Update, Working Draft, Dec. 4, 2019, 21.

<sup>19</sup> *Ibid.*, p. 25.

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51h cont.

3. The update lists the Wells Fargo Building, 1965, (San Carlos south of Ocean) as a “notable Carmel example” of the “Midcentury Modern/Bay Region Style (c1945 – 1990.)”<sup>20</sup> Dahlstrand is also credited with the design of the Nielson Market, 1979.

4. Dahlstrand is not noted in the Pebble Beach Historic Context Statement, 2013.<sup>21</sup>

51i

## Public Service

Dahlstrand has been widely acknowledged for his community involvement, which included advocating a “holding capacity” for Carmel based on the area’s “ecological limitations.”<sup>22</sup> He was a member of the tree commission and the travel advisory board; he served on the Planning Commission for nine years and on the Carmel City Council for three years, and was “actively engaged with Carmel’s local politics when not in office.”<sup>23</sup> After his retirement from architecture in 1984, at the age of 68, he integrated his skills as a renderer with his love of fine arts painting.

51j

## Recognition by Peers, Awards

Primary sources, especially living people, are invaluable resources for recollections. Donald Wald is the retired founding principal of the Monterey-based architecture firm Wald, Ruhnke & Dost Architects, LLP. Founded in 1963, it is one of the oldest and largest firms in the Monterey-Carmel Valley area. Wald served in various executive positions of the Monterey chapter, American Institute of Architects, and served the standard one-year term in 1970 as the chapter’s president. Of Dahlstrand, he said, “He was a good architect, not bad ... we had a lot of good ones at the time. He did some nice work.” Wald said that Dahlstrand was not well known for his architecture among local practitioners but said that he was very active in the Carmel Arts Association and highly regarded as a fine artist. Wald named other figures such as Francis Palms, Bob [Robert] Jones, Bob [Robert] Stanton, and the firm of Burde, Shaw & Kearns as well-regarded local practitioners in mid-century Carmel and Monterey.

While attending Cornell University’s School of Architecture, Dahlstrand was the 1939 winner of the Architecture Prize, a competition sponsored by the alumni of the American Academy of Rome.

Dahlstrand consistently won local awards for his paintings.

<sup>20</sup> Carmel Update, 2019, p. 21. The text notes that this style, marked by natural materials, “dramatic” roof lines, low-pitched or hipped, is also called the Bay Area Style and also the Second Bay Tradition. By contrast, the Update states that the “Organic” style is marked by “larger ... and more eccentric” designs than the Bay Region Style, and that it is a philosophy established by Frank Lloyd Wright, rather than a Style.

<sup>21</sup> Page & Turnbull, Pebble Beach Historic Context Statement, Monterey County, 2013.

<sup>22</sup> *Adventures of a Home Town Tourist*, March 27, 2017, <http://carmelbytheseaca.blogspot.com/2017/03/>

<sup>23</sup> 2019 Update, Carmel Historic Context Statement 2019, 17.

51j cont.

### Exhibitions

Included in *Carmel Modernism*, 2016, “a photography exhibit exploring the early influence of Monterey peninsula master architects on modernism.”<sup>24</sup> As noted earlier, he was also noted in the 1976 exhibition on Peninsula architecture.

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### Evaluation of Olof Dahlstrand as a Master Architect

The National Register’s essential requirement for a “master architect” is that that individual is “recognized for their greatness.” This does not disparage the contributions of fine architects who are locally recognized and whose work should not be forgotten. While obviously not in a position to assess her husband as a master, Dahlstrand’s widow, Mrs. Lucia Dahlstrand, said that her husband “didn’t try to influence anyone, he just wanted to do good work.”<sup>25</sup> According to the range of requirements established by the National Register and supplemental methods enumerated in the findings above, Olaf Dahlstrand does not meet the criteria for a “master architect.”

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### Notable Commercial Buildings: Carmel Plaza, Wells Fargo Bank, and the Mid Valley/Carmel Valley Shopping Center

According to the Project Index associated with the architect's records in the Berkeley EDA, there are a total of approximately 20 commercial projects out of a total of around 75 buildings completed between 1952 and 1983. Notably, Dahlstrand was a sole practitioner, without employees,<sup>26</sup> and during this period of 31 years (perhaps one built project per year), Dahlstrand was also working as a renderer, working on approximately 240 projects for many different architects, homeowners, municipalities, and developers.<sup>27</sup>

It is clear that Dahlstrand was highly skilled renderer, in demand for his ability to communicate compellingly, and beautifully. Rendering is a special talent that cannot be farmed out to others. Effectively communicating the designs of others takes time and may explain why, as a sole practitioner, the number of built projects Dahlstrand is credited with over that time span is relatively low for an architectural practice. Such a skill would also give him the freedom to choose the architectural projects most important to him.<sup>28</sup>

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<sup>24</sup> The exhibit included many important architects, including Pafford Keatinge-Clay (1926 - ), Dahlstrand, Gardner Dailey (1895 – 1967), John Howard Gamble (1911 -1997), Harwell Hamilton Harris (1903 – 1990), Albert Henry Hill (1913 – 1984), Robert Jones (1911 – 1989; whom Don Wald worked for), John Konigshoter (1907 – 1990), Roger E. Larson (1935 – 2009), Frank Lloyd (1907 – 1983), Clarence Mayhew (1906 – 1994), Mark Mills (1921 – 2007), Charles W. Moore (1925 – 1993), Richard Neutra (1892 – 1970), C.J. Ryland (1892 – 1980), Ralph L. Stean (1918 – 2004), John Thodos (1934 – 2009), Will Shaw (1924 – 1997), Walter Burde (1912 – 1996), Mary Ann Schicketanz (1956 - ), Frank Lloyd Wright (1867 – 1959), Willam Wilson Wurster (1895 – 1973), and Joseph Sythe (1920 - .)

<sup>25</sup> Interview with Mrs. Lucia Dahlstrand, March 23, 2021.

<sup>26</sup> Ibid.

<sup>27</sup> <https://archives.ced.berkeley.edu/collections/dahlstrand-olof>, UC Berkeley, Environmental Design Archives.

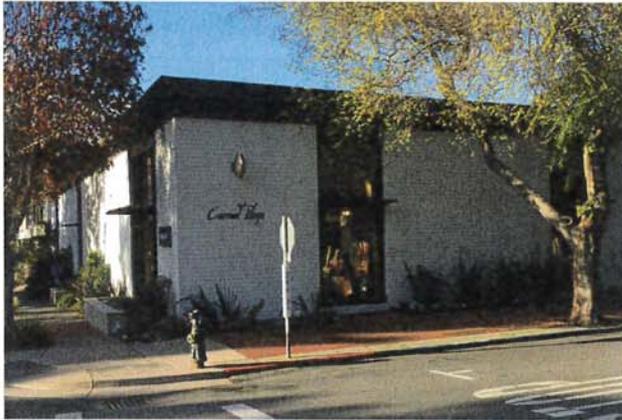
<sup>28</sup> In the interview with Mrs. Dahlstrand, cited above, she said that her late husband had said that “he made more money rendering than he did as an architect.”

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53b

## 1. Carmel Plaza, 1960



Carmel Plaza, former I. Magnin building. Camera facing southwest. Photo by author.

According to the Page & Turnbull report, "Dahlstrand's first shopping center in the area was the Carmel Plaza, centrally located in Carmel-by-the-Sea southwest of the intersection of Junipero Street and Ocean Avenue. Designed in multiple parts between 1959 and 1965, the portion of the much-altered center which today is most recognizably Dahlstrand's is the 1960 store at the southeast corner of Ocean Avenue and Mission Street which was originally designed for I. Magnin & Company."<sup>29</sup>

However, research suggests a more complicated provenance for this corner building, the original I. Magnin (on the corner of Ocean Avenue and Junipero Street, not Ocean Avenue and Mission Street.) On March 15, 1960, the *San Francisco Chronicle* noted that Los Angeles architect Harold Chambers designed the one-story corner building. Harold Coulson Chambers Sr. was a Southern California architect who designed at least two other I. Magnin stores in the late 1930s/early '40s with famed architect Myron Hunt, practicing as the firm Hunt and Chambers.<sup>30</sup> In reviewing I. Magnin stores on the website "thedepartmentstoremuseum.org" it can be seen that a consistent signature style for the upscale brand was the use of alternating vertically oriented panels of either glass or a material that was a contrast in color, texture, and depth to adjacent panels, setting up a clearly defined rhythm (see especially the stores: Santa Ana, 1958; Walnut Creek, 1967; Sherman Oaks, 1962; and Del Amo Fashion Square, 1967.)<sup>31</sup>

By contrast, an undated rendering in the Dahlstrand archives, also attached, states that the architect for the project was not Harold Chambers but Francis Palms, who "furnished the rendering of the project to the newspaper." The design of the I. Magnin building of the Palms design is very similar to that of the Chambers design, especially pronounced in the rhythm of full-height solid white walls alternating with the "voids" of full-height windows. The rendering is stylistically very similar to Dahlstrand's own renderings.

<sup>29</sup> Page & Turnbull, *ibid.*

<sup>30</sup> <http://pcad.lib.washington.edu/firm/327/>

<sup>31</sup> <http://www.thedepartmentstoremuseum.org/search?q=magnin>

53b cont.

Other contemporaneous clippings identify Palms as the architect and the San Francisco office of legendary Chicago-based firm, Skidmore Owings and Merrill (SOM) as the consulting architect. Dahlstrand was working for SOM's San Francisco office at the time; according to Mrs. Dahlstrand, her late husband was probably the firm's representative on the job but soon left in 1959 to open his own practice.<sup>32</sup>

The original layout by Francis Palms/SOM appears to be a blocky, U-shaped grouping of two-story volumes partially open to Ocean Avenue. Palms was identified as the architect until February 1959,<sup>33</sup> and by March 1959—a very short time span given the degree of overhaul needed to submit new plans to the Planning Commission—Olof Dahlstrand was identified as the architect for a scaled down project of three buildings. He continued to be identified as the architect of record during construction.<sup>34</sup>



Carmel Plaza Rendering. Francis Palms and SOM are noted as architects. Oct. 8, 1958.

This is an architect's concept of how Leslie C. Fenton's proposed Carmel Plaza, a block-square development, would appear to a viewer standing at the northwest corner of Ocean Avenue and Mission Street. Fenton hopes to go before the Carmel Planning Commission late next month with plans for his \$2.5 million project in the block bounded by Ocean, 7th, Junipero and Mission. Carmel Plaza will include a 65-room garden hotel, a restaurant, bank, several shops and two levels of underground parking. It was designed by Francis Palms Jr., a Carmel architect, and the San Francisco firm of Skidmore, Owings and Merrill, consulting architects.

<sup>32</sup> SOM archivist Heather Cornish did not find Dahlstrand in any company records, but also stated that given the early dates of his employment, around 1950 – 1958, records might be lost. The SOM archives do include a photograph of an actual model of the Palms/SOM design. The photo of the model, SOM Project No. 10424, was labeled "Project Abandoned."

<sup>33</sup> *Carmel Pine Cone*, February 12, 1959.

<sup>34</sup> *Carmel Pine Cone*, March 19, 1959.

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53b cont.



Carmel Plaza (Pentecost Block) plans will be presented officially to the Carmel Planning Commission at its study session Wednesday. The elevation above furnished by Francis Palms, architect for the project, shows the Ocean Avenue-Jupiter Street structure as you would see it if you were standing on the north-east corner of Ocean and Jupiter. Palm pictured in the center Ocean Avenue planting is the Carmel Christmas tree. At the far right is the Bath of Ananias building (Ocean and Mission) flanked by a small shop which faces on the Mall left of the Mail and Market a corner of Ocean and Jupiter. The two issues are the location respects and will not be developed by Jupiter Street.

Unknown source, in Berkeley Archives adjacent to Chronicle clipping. Francis Palms is noted as architect

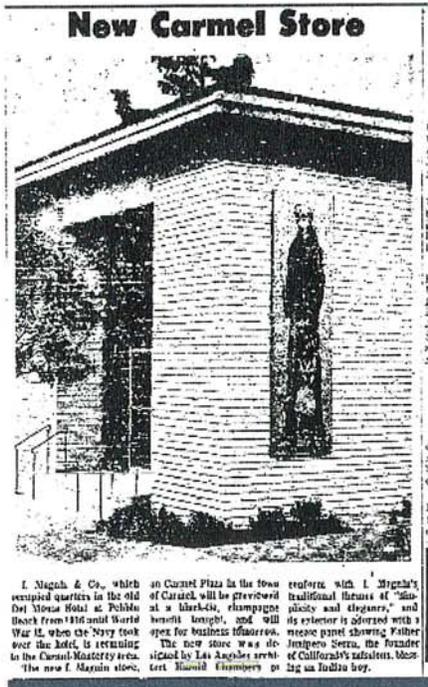
FRIDAY, MAY 15, 1959.



PHOTO FOR MONTEY PENINSULA HERALD

**PENTON PROJECT**—This is an artist's sketch of three commercial structures planned by Leslie C. Penton for the south side of Carmel's Ocean Avenue, between Jupiter and Mission. All were designed by Carmel architect Olof Dahlstrand. Shown at far left is L. Magnin and Co. women's apparel shop. At opposite end of block will be a Bank of America branch. That building will also contain up to three shops. Structure between bank and Magnin's will have up to five stores. Building materials will be primarily "off-white" concrete brick and naturally weathered redwood. Meyerson Pacific Inc. and James L. Barnes Construction Co. of Redwood City are expected to begin work in about six weeks. The project will involve demolition of the Carmel Theater building.

*The Monterey Peninsula Herald, May 15, 1959. Olof Dahlstrand noted as architect. Note that while the second story of the L. Magnin store has been removed, the ground story has remained the same.*



I. Magnin & Co., which occupied quarters in the old Del Monte Hotel at Pebble Beach from 1916 until World War II, when the Navy took over the hotel, is returning to the Carmel-Monterey area. The new I. Magnin store, on Carmel Plaza in the town of Carmel, will be previewed at a black-tie, champagne benefit tonight, and will open for business tomorrow. The new store was designed by Los Angeles architect Harold Chambers to conform with I. Magnin's traditional themes of "simplicity and elegance," and its exterior is adorned with a mosaic panel showing Father Junipero Serra, the founder of California's missions, blessing an Indian boy.

San Francisco Chronicle, August 15, 1960, with text enlarged, above.

Notably, as can be seen in the clippings above, while the distinctive design of the I. Magnin ground floor is unchanged, the loosely rendered upper story seen in the unidentified clipping (identifying Palms as the architect) has been removed in the Dahlstrand rendering of his design.

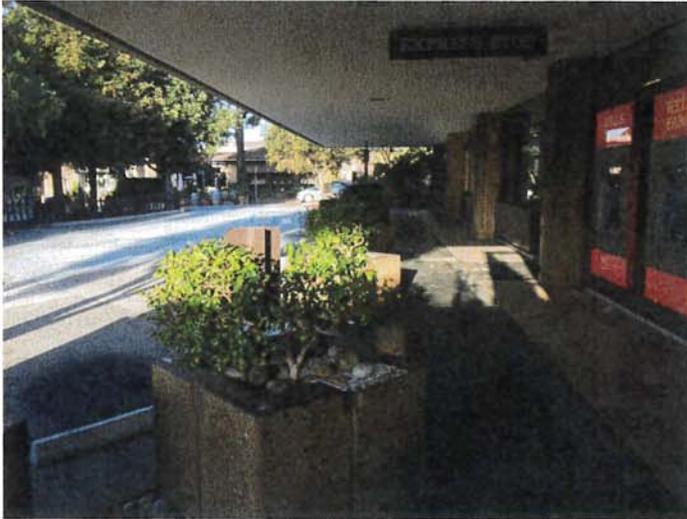
What may have happened is a common practice: a corporate architect (i.e., from I. Magnin) teams up with a local architect (Olof Dahlstrand) who knows the players and practices of a local community. However, it does appear that the design may have originally been the contribution of Harold Chambers on behalf of the iconic brand, a design neither by Palms, Skidmore Owings and Merrill, nor entirely Dahlstrand's. Today, the former I. Magnin building remains a pivotal anchor at the eastern edge of Ocean Avenue's shopping district; the rest of the plaza has been significantly altered.

2. The Wells Fargo Bank, San Carlos Street and Ocean Avenue, 1965.

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53b cont.



The Wells Fargo Bank, 1960. Upper photo, camera facing west. Lower photo, camera facing northeast. Photos by author.



Sited perpendicular to San Carlos Street, the bank provides a quiet and strong statement in contrast to the surrounding busily decorative retail context of Ocean Avenue. Its unusually long cantilevered shed copper roof is anchored on the north by an incised, stepped, and crenellated volume of earth-colored stained concrete and exposed aggregate. Rising to meet this volume, the seemingly weightless roof simultaneously looms over and invites users into the broad pedestrian walkway leading east along long windows and brown tile walls to the entry. Engaged pilasters comprise earth-colored stained, board-formed, incised concrete forms that frame a U-shaped cladding of exposed aggregate. (In a slightly different form, these

*Letter of Memorandum, Carmel Valley Shopping Center / Mid Valley Shopping Center, The Stanley Properties, March 2021, Dr. Barbara Lamprecht*

53b cont.

pilasters are very similar to the columns Dahlstrand employed a year later at the Mid Valley / Carmel Valley Shopping Center.) The walkway is further defined at its far edge by angled square planters, separating visitors from the parking area; together the pilasters, windows, and planters create a clearly defined rhythm. The building may well salute Wright's famous Della Walker House, 1948, whose broad roof juts out with an exaggerated cantilever above Carmel Bay's rocky shoreline, but Dahlstrand's bank is an original work. This report concurs with Historic Context Statement, Carmel-By-The-Sea as one of Dahlstrand's most notable works in Carmel. The property is worthy of consideration for designation at any level.

### 3. The Mid Valley / Carmel Valley Shopping Center

For ease of use, the Safeway's primary elevation facing Carmel Valley Road is assumed to be pointing north. The Center comprises five buildings wrapping around a large parking lot:

- . Safeway with a broad, angled roof and associated shops (Building A, Painter Preservation)
- . A small one-story building, not original, in the southeast corner of the complex (Building B)
- . The west-facing former Valley Theatre and associated shops (Building C, along Berwick Drive)
- . The former Crocker Citizen's National Bank, now Carmel Valley Ace Hardware, at the northeast corner of the property (Building D)
- . Carmel Valley Auto Service, formerly a gas station (Building E), at the property's northwest corner.

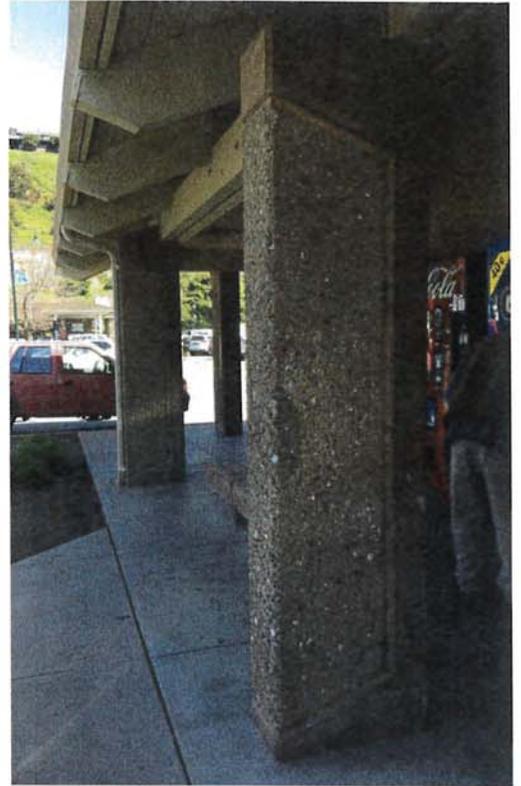


Building A, Safeway and shops. Camera facing southeast. Photo by author

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cont.



Building C, the former Valley Cinema, now Iolis' Pizzeria, camera facing east, above. Typical columns for the Mid Valley / Carmel Valley Shopping Center, right. Note similarity to the pilasters of Wells Fargo Bank, Carmel-By-The-Sea. Photos by author.



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March 2021, Dr. Barbara Lamprecht*

The rear of the former Valley Cinema, Building C, adjacent to Berwick Drive, the eastern edge of the property. Camera facing northwest. Photos by author.

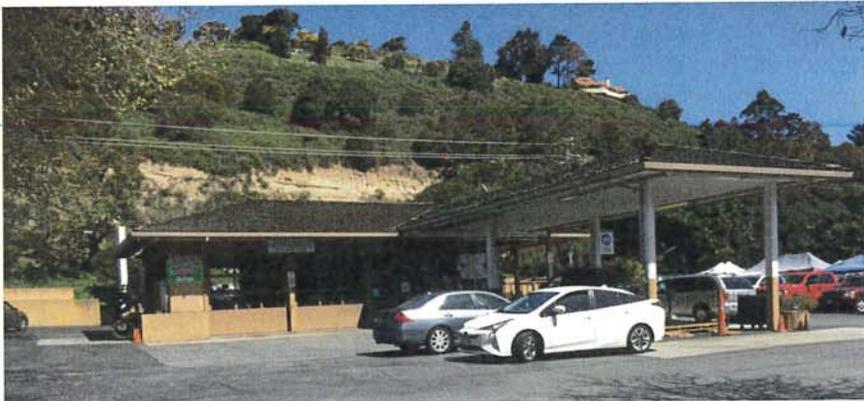
53b cont.



Building D, the former Crocker Citizen's National Bank, now Carmel Valley Ace Hardware. Camera facing southwest.

Building E, below, now Carmel Valley Auto Service, formerly a gas station. Camera facing north.

Photos by author.



The Mid Valley / Carmel Valley Shopping Center's name is based on its relatively out-of-the-way location, set midway between Carmel-By-The-Sea to the north and Carmel Valley Village to the south, a total distance of thirteen miles along a backdrop of a hilly, heavily wooded, and winding Carmel Valley Road. The site is slightly below the road.

Two qualified architectural historian/preservation consultant firms evaluated the property, agreeing that the property is eligible for listing in the National Register of Historic Places. These are the Page & Turnbull report, "Phase One Historic Assessment in the form of Department of Parks and Recreation (DPR) 523A and 523B," Nov. 18, 2019, and Painter Preservation in its Dec. 21, 2020 report, "Mid Valley Shopping Center Historic Resource Evaluation/Phase I Assessment 9550 Carmel Valley Road."

### Background

53c

Notably, according to the Dahlstrand Collection held by Berkeley EDA, Mr. Dahlstrand's own hand-written

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53c cont.

records, titled Olof Dahlstrand Renderings, show that in 1960 one of his 11 rendering projects that year for architect John Paul Warnecke and Associates was Warnecke's Del Monte Shopping Complex, Monterey, which opened in 1967, seven years later. In 1964, Dahlstrand rendered four more drawings for Warnecke on the Del Monte project.<sup>35</sup> Dahlstrand began his design for the Carmel Valley Shopping Center a year later, in 1965, completed in 1966 and 1967, thus he would have been intimately familiar with the Warnecke design. The two projects are just nine miles apart.

The Del Monte Center was noted in *Architectural Record*, April 1968, for the sensitive siting and variety of its buildings against a carefully choreographed setting of trees and landscaping, designed by the internationally renowned landscape architects Lawrence Halprin and Associates, so quite a prestigious project.<sup>36</sup> It was also lauded for its natural materials of stone, masonry, concrete, and wood.



John Carl Warnecke & Associates, Monterey, 1967, with Lawrence Halprin, landscape architects, was Monterey's first major shopping center. <http://architecturalroadtripvol2.blogspot.com/>

As noted in the Pebble Beach Historic Context section addressing commercial buildings, the Del Monte Center's broad roof overhangs, rustic look, and low-sloped hip and gable roofs "are a most common," characteristic of many commercial buildings in the area.<sup>37</sup> Such properties include the Lodge Annex, The

<sup>35</sup> John Carl Warnecke (1919 – 2010) was an award-winning architect with many notable buildings; as a student at Harvard he studied with Walter Gropius. While he considered himself a Modernist, he is known for his work as a "contextural" architect, meaning designs that fit into their surrounding environment as well as their cultural and historical setting. Warnecke became a Fellow of the AIA in 1962.

<sup>36</sup> A former employee of distinguished Modern landscape architect Thomas (Tommy) Church, the world-famous Halprin was a frequent collaborator of architect William Wurster. Halprin was inducted as a Fellow of the American Society of Landscape Architects, FASLA, in 1969.

<sup>37</sup> Page & Turnbull, Pebble Beach Historic Context Statement, Aug. 29, 2013, p. 129.

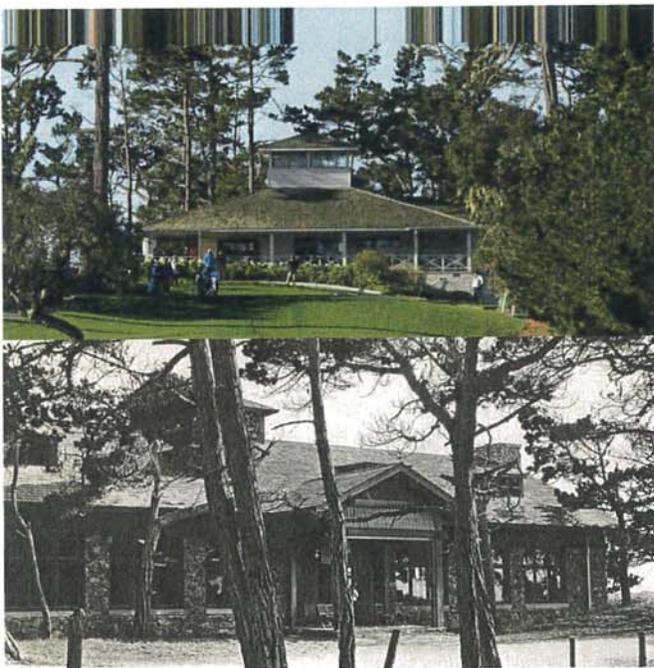
53c cont.

Lodge, Pebble Beach, by Gardner Dailey, 1949, John Gardiner's Tennis Ranch, Carmel Valley, 1957, or the Spyglass Golf Course Clubhouse, Pebble Beach, 1966, all possessing a similar range of familiar features that have endured across decades and building types throughout the Peninsula.



**West wing of the Lodge Annex.  
(Page & Turnbull, November 2012)**

designed by Gardner Dailey, 1949. Note low-sloped hip roof, broad overhang, concrete pillars, all typical character-defining features of Monterey – Carmel area commercial architecture.



Spyglass Golf Course Clubhouse, Pebt Beach, 1966. Architect not known.

Crocker Dining Hall, Asilomar, circa 1920.  
Julia Morgan  
<https://www.visitasilomar.com/discover/park-history/>

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53c cont.

Both Warnecke's and Dahlstrand's designs recall many such vernacular characteristics, as well as recalling seminal icons such as Julia Morgan's design of Asilomar, completed in 1913. Morgan's broad roofs, exposed stone, and big timber wood framing continue to be influences permeating the region's design sensibilities.

Arguably, the influences of such familiar buildings are as equally influential for local architects as the work of Frank Lloyd Wright, as proposed in the Page & Turnbull report. Wright's work, very different at different times in his long career, can said to have "influenced" thousands of architects. His legendary Wasmuth Portfolio of drawings, 1910-11, deeply "influenced" Richard Neutra and Rudolf Schindler, but their architecture looks very different to that of Wright's designs, as the "influence" was not in outer appearance but in the underlying philosophical potential of Wright's truly radical thinking. One didn't mimic Wright's forms but absorbed his lessons.

53d

### **Dahlstrand, Warnecke, and their Shopping Centers**

A closer look of the two shopping complexes, Del Monte and Carmel Valley / Mid Valley, suggest that the latter was largely based on the former. (The similarities between the two are also noted in Painter Preservation's report, with no conclusions drawn.<sup>38</sup>) Both are suburban shopping centers predicated on the car and share some of the same features and design strategies, including a relaxed spatial layout of buildings, roof lines of low, hipped roofs of wood shake or facsimile shake, linear patterns, and articulated concrete supporting columns supporting broad overhangs to create sheltered pedestrian colonnades. In the Warnecke design, the elegant, faceted pillars are tapered, slender at the top and larger at the base. Dahlstrand's columns are stouter and rectangular (like the columns of the Lodge Annex, seen above), with surfaces combining exposed aggregate and colored concrete intaglio figuring similar to the engaged pilasters at his Wells Fargo Bank, Carmel-By-The-Sea, 1965.

The Painter Preservation report evaluated the property as a historic district. However, the convention of a historic district—one acknowledged by many planning departments in lead agencies as well as by architectural historians—is that a district includes several properties that may have been built by different architects at different times but that are connected by a theme. By contrast, the Mid Valley / Carmel Valley should be interpreted as a single property with several buildings, conceived by one architect as one complex, designed as a unified whole (with the possible exception of the gas station, discussed below), built at the same time, and opened on the same day, October 19, 1966.<sup>39</sup> Were the logic conceiving several structures on one property as a district consistent, most single-family properties with outbuildings and a garage or other built features would be considered to be historic districts. They are not. They are treated and evaluated as one property.

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<sup>38</sup> Mid Valley Shopping Center Historic Resource Evaluation, /Phase I Assessment 9550 Carmel Valley Road, p. 49.

<sup>39</sup> *Carmel Valley Outlook*, Oct. 19, 1966, p. 14.



Rendering of the Carmel Valley / Mid Valley Shopping Center, Olof Dahlstrand. Undated, Berkeley EDA. The same drawing was used for the article in the *Carmel Valley Outlook*, October 19, 1966, p. 14.

53d cont.

Reviewing the buildings more closely, Dahlstrand's Safeway design at Mid Valley / Carmel Valley is an angled version of the curvaceous barrel-vault prototype for Safeway store across the country, first developed by master architects Wurster, Bernardi & Emmons for the Marina Safeway, which opened in San Francisco in 1959. With its long flat top and angled sides, the Carmel Valley Safeway achieves the same heightened central section as the original curved Safeway standard, while its flat roof and angled sides maintain the overall look of the other buildings on site. The extensive drawings in Berkeley EDA reflect Dahlstrand's direct work on the building.

By contrast, while obviously a secondary building in the mix, the former Standard Oil/Chevron gas station (now the car repair facility), merits discussion because its authorship is in doubt. It first appears in a circa January 1966 site plan, where a rectangular building footprint includes the initials "N.I.C.," meaning "not in contract."<sup>40</sup> (An earlier sketch in the Berkeley EDA dated May 27, 1965, shows the Safeway and cinema building designs, while other buildings, including what would become the gas station, were shown in rudimentary outline with vertical hatching, which the site key states as "Future Bldg. Sites.") As can be seen in the rendering above, by October 1966 (the exact same rendering is seen in the *Carmel Valley Outlook*, Oct. 19, 1966), the gas station, including the long asymmetrically located bay for pumping gasoline, is clearly represented. However, no design development or construction documents could be located in the Berkeley EDA, as is the case for the other buildings.

<sup>40</sup> Drawn by Dahlstrand, the date of the title block is illegible. As noted by Dr. Kirk, a "C.J. Colette" has written the date 1-18-66 elsewhere on the rendering.

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53d  
cont.

## The Standard Oiler

NEW STATION DESIGNS ENHANCE MARKETING OUTREACH



Mid Valley Shopping Center / Mid Valley Shopping Center, The Stanley Properties, 23  
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53d cont.

It may be that company architects for Standard Oil's Western Operations used Dahlstrand's sketch on which to base their own corporate drawings for the simple structure. As reported lavishly in a May 1968 publicity booklet, *The Standard Oiler*, in the 1960s the Standard Oil company was marketing a "special architecture" type of service station, distinguished from their "standard" stations. The "special architecture" stations were "a departure from the standard design and includes a rustic, ranch-style appearance with either a gable or hip roof, and extensive planted areas ... "The booklet also pointed out that Standard Oil (which was affiliated with Chevron at the time) had "erected specially designed stations at Stanford University, Santa Barbara, Carmel, Palm Springs, and on San Francisco's Nob Hill."<sup>41</sup> Such "special architecture stations" were "built to blend with their surroundings," noted the *Oiler*.<sup>42</sup> This is certainly the case with this little service facility.

In any case, there is no evidence that proves who finally designed the station.

*The Standard Oiler*, May 1968 shows low-sloped and gable and hip roofs clad with wood shakes, very much in character with the Mid Valley / Carmel Valley Shopping Center.

54a

#### **Significance of the Mid Valley / Carmel Valley Shopping Center Related to Other Centers**

As noted in the introduction, this report concurs with the evaluations of Dr. Anthony Kirk and Dr. Laura Jones. Jones notes that "there may be many better-preserved examples of mid-20<sup>th</sup> Century shopping centers in California."

Innovative postwar shopping centers integrated the car—by mid-century now an inevitable element in the suburban landscape—with the pedestrian, so that one kind of "traffic" didn't interfere with the other. By contrast, the Carmel Valley Shopping Center is quite conventional in simply wrapping buildings around a large parking area with no consideration for the pedestrian path of travel. It does not "exhibit a cohesive, comprehensive modern architectural expression" as stated in the Painter Preservation report.

54b

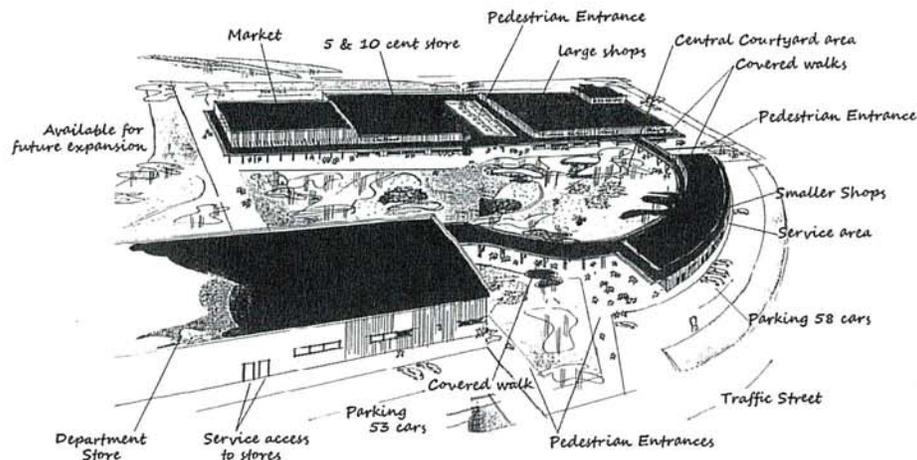
However, the nearby Del Monte Shopping Center designed by John Warnecke *does* exhibit such an expression. A long spine of interconnected, landscaped spaces permits shoppers to walk unimpeded, away

<sup>41</sup> *The Standard Oiler*, May 1968, p. 18.

<sup>42</sup> *Ibid*, p. 22.



Generous parking on the perimeter of the thirteen acre Shopping Center



Linda Vista Shopping Center, San Diego, 1943

54d

**Summary, Significance under National Register Criterion C, Mid Valley / Carmel Valley Shopping Center**

The shopping center is not a distinguished example of a postwar/mid-century shopping center. It does not exhibit a cohesive approach to a site design that addresses both the vehicle and the pedestrian, but rather lines up buildings around a parking lot. The roof lines of the buildings are no more or no less dramatic than the rooflines of many other public and commercial buildings in the Carmel Valley / Monterey Peninsula area, many of whose low slopes can be said to “echo the surrounding hills.” Finally, it is not particularly “Modern” in expression but rather takes its cue from other local and prevalent styles. The Mid Valley / Carmel Valley Shopping Center does not represent the work of a “master architect” and does not possess “high artistic values.” It does not “represent a significant and distinguishable entity whose components may lack individual distinction.”

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**County of Monterey Criteria for Designation**

Local criteria for designation are important because they are often more specific than federal or state criteria in addressing community concerns. Maintaining the historic character, civic memory, and especially the scale of Carmel-By-The-Sea and Carmel Valley are qualities that are highly cherished and protected. As presented at the beginning of this report, the pertinent criteria are:

**A. 5** The resource or district proposed for designation represents the work of a master builder, engineer, designer, artist, or architect whose talent influenced a particular architectural style or way of life.

*Olof Dahlstrand did not influence a particular architectural style or way of life.*

**C. 1** The proposed resource materially benefits the historic character of the community and **C. 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 the county.

## modern resources

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55 cont.

*These two criteria are more challenging because they are vague. However, arguably these criteria are important because they seek to avoid the cumulative "death by a thousand cuts" that can compromise the unique individuality, history, and sense of place that make an area special. Thus, change is potentially more difficult if not impossible because many buildings, features, etc., might be argued to "materially benefit the historic character of the community," quite a subjective endeavor. Likewise, if in place long enough, virtually any structure, tree, fence, sign, etc. can be said to be "an established and familiar visual feature."*

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*It should be noted here that while this report evaluates the Mid Valley / Carmel Valley Shopping Center as not meeting the requisite thresholds of Criterion C, the familiar structures and rooflines of the Center will remain as they have since 1967, and thus the continuity of place will be preserved.*

This concludes this evaluation of the Mid Valley / Carmel Valley Shopping Center.

*Anthony Kirk, Ph.D.  
420 Alberto Way, No. 13  
Los Gatos, CA 95032  
408-827-4959*

3 January 2020

Brandon Swanson  
Interim RMA Chief of Planning  
Monterey County Resource Management Agency  
1441 Schilling Place  
Salinas, CA 93901

Dear Mr. Swanson:

57

I should like to draw your attention to errors in the evaluation of the Carmel Valley Shopping Center prepared by the firm Page & Turnbull. Much of the writing, if not most of it, is presumably the work of Stacy Kozakavich, Ph.D. Although she identifies herself as a “Cultural Resources Planner/Archaeologist,” on the Page & Turnbull website, she does not mention that she was trained as an anthropologist/archaeologist in her cover letter of 18 November 2019 to you, which accompanies her Phase One Historic Assessment of the Carmel Valley Shopping Center. Dr. Kozakavich received an M.A. in “Anthropology (Archaeology)” in 1988 from the University of Saskatchewan and a Ph.D. in Anthropology in 2007 from the University of California, Berkeley. She states she is a Cultural Resources Planner in her letter to you, but identifies herself as a “Cultural Resources Planner / Historian” in her Memorandum commenting on my evaluation of the Carmel Valley Shopping Center. She was trained as an anthropologist, not as an architectural historian or as a historian, which may explain the presence of significant mistakes in her evaluation of what she erroneously calls the Mid Valley Shopping Center. Possibly she and the firm for which she works are under the impression that an archaeologist and a historian are the same. They are not.

Dr. Kozakavich fails to understand the character of the report I wrote evaluating the Carmel Valley Shopping Center. When a resource does not appear to be significant, the County of Monterey requires a “letter stating why the property is not historically significant, citing local, state, and federal criteria to support the finding,” according to the Guidelines for Historic Assessments, published on 2 March 2017. A letter report is required, rather than DPR 523 forms, in order to save the property owner money. If the Monterey County employee who reads the evaluation is of the opinion that necessary information is missing in the evaluation, he or she may obviously request additional information from the evaluator.

Dr. Kozakavich’s comments on how my evaluation might be improved would increase the cost considerably—probably by a factor of five to ten—if implemented and run

**EXHIBIT D**

contrary to the express purpose of the Guidelines for Historic Assessments. There are a variety of errors in Dr. Kozakavich's review comments, such as calling a segmental arch a barrel vault, which are not worth bringing to your attention. Three of her many observations, however, demand to be addressed. (I have, it should be noted, corrected those sections of my evaluation that were in error and submitted a revised report to you.) The roof of Block 1, according to Dr. Kozakavich, should be described as a hipped roof rather than a flat roof surrounded by shed roofs (Memorandum, page 2). A quick glance on Google Maps at the roof of Block 1 (or Figure 1 of the DPR 523A forms prepared by Page & Turnbull makes it evident that it is not a hipped roof, but a flat roof bordered by low-pitched shed roofs. Dr. Kozakavich states that when Block 2 was altered in 1981, "the expansion was relatively small compared to the original complex as a whole (Memorandum, page 2)." The original building comprised 2,275 square feet, the addition 8,697 square feet. Dr. Kozakavich may think that the addition of 8,697 square feet is "relatively small compared to the original complex" of 2,275 square feet. I do not. Finally, and perhaps most important, Dr. Kozakavich is of the opinion that, with regard to the shopping center as a whole, much of my discussion of the "building's architectural significance" (by which she presumably means "buildings's architectural significance" or, more handily, "architectural significance of the buildings") is in fact "an integrity analysis (Memorandum, page 3)." There is no analysis of integrity in my evaluation. I did not find the shopping center to be architecturally or historically significant, and as such there was no reason to consider the matter of integrity in a clear and systematic manner. No more than four or five sentences in my entire evaluation touch on alterations to the buildings.

I should also like to draw your attention to two obviously erroneous statements that appear in the DPR 523 forms prepared by Page & Turnbull. Block 1 is said to be a "one-and two-story commercial building." Safeway, which ostensibly is two stories in height, is in fact a single-story building, with a roughly 1,000 square-foot mezzanine at the back of the 20,832 square-foot store. Both the store and the mezzanine, which holds a lounge, restrooms, and a mechanical room, share a single ceiling. It is ludicrous to describe the building as two stories in height. Entrance to Mid Valley Storage is not on the west side of Block 3, as stated, but on the east side, off of Berwick Drive. The entrance and lobby of what was originally Valley Cinema, commanding nearly 800 square feet, is occupied by Skinovation. It should also be noted that the photograph that forms Figure 47 and Figure 36, which is an edited version of the former image, was not taken in 1971, but rather about 1966, as work on Block 2 had not yet begun.

At the heart of the Page & Turnbull evaluation of the Carmel Valley Shopping Center is the conclusion that the complex is eligible for National Register of Historic Places, the California Register of Historical Resources, and the Monterey County Local Official Register of Historic Resources. In my opinion, it is not eligible for listing in any of these three registers. Of the five blocks that make up the shopping center, Block 2 dates largely to 1981, when an 8,697 square-foot addition was made to a 2,275 square-foot building. Most of the block is less than fifty years old, and lacking any significance in

design, it is not eligible for listing in any of the registers. Block 5 was designed as a service station and is entirely conventional in appearance, without a single element of interest. Block 4, which originally was occupied by Crocker-Citizens National Bank, is of some interest, but it lacks the element that define Block 1 and Block 3: a low-pitched roof that extends far beyond the exterior walls of the structures composing the block and rests on concrete piers featuring exposed aggregate on three sides. This feature provides a covered walkway that shields pedestrians from the sun in the summer and rain in the winter.

Olof Dahlstrand is among the many architects mentioned in *Historic Context Statement: Carmel-by-the-Sea* (2008) (pages 45, 48, 105), where his first name is misspelled Olaf. The single work he designed that is mentioned is the Wells Fargo Bank building, a singularly handsome structure that is listed in the Carmel Inventory of Historic Resources. Dahlstrand ceased to work as an architect about 1993 and devoted the last two decades of his life to art and served, as well, on both the Carmel planning commission and the city council

The Page & Turnbull evaluation states that the “shopping center exemplifies Dahlstrand’s use of form and material in a Wrightian-inspired design that respects the features of its surrounding natural environment. Though an undoubtedly commercial complex, Frank Lloyd Wright’s influences can be seen in the use of naturalistic materials and dramatic roof lines echoing the surrounding hill slopes. Further, it is a unique example of the application of the architect’s work to a large suburban commercial complex, with integrated vehicle parking and circulation in addition to pedestrian walkways and courtyards (page 39).” The shopping center may indeed be a “unique example” of Olof Dahlstrand’s work, but there is nothing unique about either the parking lots, the walkways, or courtyard. The two sole characteristics that ostensibly make the shopping center eligible for the National Register, the California Register, and the Monterey County Register are “the use of naturalistic materials and dramatic roof lines.” The use of walks with roofs supported by concrete piers is a nice touch, but the walks do not define the architecture of the shopping center. Dr. Kozakavich may find the roof lines dramatic, but the *Monterey Herald*, on 13 July 1966, reported that the developers of the Carmel Valley Shopping Center desired “that the architectural design and structural excellence of the project reflect the characteristic warm color and horizontal flow of the valley terrain.”

Block 2 is said to have been built in two stages, the first in 1977, the second in 1982 (page 39). Block 2 was constructed in three stages: 1967, 1981 and 1982. Roughly two-thirds of the building dates to 1982. Few of its features relate to the elements of Block 1 or Block 3, except for significant roof overhang. Block 4 is a handsome building, but the overhanging roof is not supported by concrete piers, as the roofs of Block 1 and Block 3 are. The design of Block 5 is conventional in every regard. Block 1 and Block 3 are of some interest, but their design does not, in my opinion, raise the shopping center to a level of architectural significance that would allow the complex of buildings to be placed

57 cont.

in any of the registers, national, state, or local. Finally, in my opinion, the Carmel Valley Shopping Center is not a “Wrightian-inspired design.” Wright was a master architect, possibly the most important and celebrated of all American architects. He designed a single shopping center over the course of his lifetime, the Anderton Court Shops, a small three-story complex that is on the National Register of Historic Places (figure 1).



Figure 1. Frank Lloyd Wright, Anderton Court Shops, Rodeo Drive, Beverly Hills, California. The small shopping center opened in 1952 and was added to the National Register of Historic Places in 2004.

57 cont.

Originally the center held four shops and a penthouse, with a spiral ramp that led from the ground level to the top. The building has the grace and panache of design that is completely absent in the Carmel Valley Shopping Center.

It is nothing short of astounding that a nomination spread over forty-two pages makes no mention of the significant alteration to two of the storefronts in Block 1, nor does it mention the work that transformed the entry and lobby of the Valley Theater into a shop occupying nearly 800 square feet, Skinovation. The transformation of the space, at the front of the block, enclosed an entry lined with movie posters and radically altered the terminus of the cross gable. These alterations have led to a loss of original materials, workmanship, and feeling.

In my opinion the Carmel Valley Shopping Center is not eligible for the National Register of Historic Places, the California Register of Historical Resources, or the Monterey County Local Register of Historical Resources.

Sincerely yours,



Anthony Kirk, Ph.D.

Anthony Kirk, Ph.D.  
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Santa Barbara, CA 93105  
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14 December 2021

Dale Ellis  
Anthony Lombardo & Associates, Inc.  
144 E. Gabilan Street  
Salinas, CA 93901

Dear Mr. Ellis:

58

I have carefully read the Mid-Valley Shopping Center Design Approval Draft EIR. It has not altered my original opinion of the Carmel Valley Shopping Center, which, as you recall, is that it does not meet the criteria for inclusion in the National Register of Historic Places under Criterion C, the California Register of Historical Resources under Criterion 3, or the Monterey County Local Register of Historical Resources under Criteria A5, C1, or C2. The Draft EIR appears to have been assembled in haste and is flawed by the absence of two critical documents, as well as reliance for much of the information it contains on the report written by Page & Turnbull, dated 11 November 2019. The documents that are missing from the Draft EIR comprise the following:

59

1. My letter to Brandon Swanson, Interim RMA Chief of Planning for the Monterey County Resource Management Agency, dated 3 January 2020. In this letter I bring attention to several errors made by Stacy Kozakavich, Ph.D., makes in her evaluation of the five buildings, termed “blocks” in her report, that comprise the Carmel Valley Shopping Center, the correct name of what the EIR erroneously calls the Mid-Valley Shopping Center.<sup>1</sup> She failed, most notably, to mention the transformation of the Valley

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1. The drawings produced by Olof Dahlstrand, architect of the shopping center, almost invariably use the title Carmel Valley Shopping Center, although a few are titled Mid-Valley Shopping Center. The Olof Dahlstrand Collection in the College of Environmental Design, University of California, Berkeley, references the Carmel Valley Shopping Center as the proper name. News stories on the shopping center typically use the term Carmel Valley Shopping Center, as may be seen in *Carmel Valley Outlook* for 19 October 1966, the *Monterey Herald* for 13 July 1966, 23 August 1966, and 8 May 1967. The confusion between the two names undoubtedly arose because the developers of the Carmel Valley Shopping Center had chosen the name Mid Valley Associates for themselves.

59 cont.

Theater, which became Mid Valley Self Storage and the shop Skinovation, in her evaluation of the integrity of the Shopping Center. The extensive alterations to the Valley Theater led to numerous changes in the design of Building 3, as well as to the loss of original materials, workmanship, and feeling, four of the seven aspects of integrity, according to National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation* ([Washington, D.C], 2002).

Parenthetically, I also noted in my letter that Building 1, or Block 1, is said on page 2 of Dr. Kozakavich's evaluation to be a "one- and two-story commercial building." Safeway, which is ostensibly two stories in height, is actually a single story in height, with a roughly 1,000-square-foot mezzanine at the rear of a 20,382-square foot store. Both the store and the mezzanine share a single ceiling. The entrance to Mid Valley Storage is not west side of Block 3, as stated, but on the east side, off Berwick Drive. The entrance and lobby of what was originally Valley Cinema, containing 800 square feet, was until relatively recently occupied by Skinovation. I also stated that the photographs forming Figure 36 and Figure 47 were not taken in 1971 as stated, but rather about 1966, as work on Block 2 had not yet begun.

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2. Equally important is the absence of the Letter of Memorandum by Barbara Lamprecht, M.Arch. Ph.D., to Brandon Swanson, dated April 2021. This letter is both far-ranging and unusually perceptive in its discussion of the architect who designed the Carmel Valley Shopping Center, Olof Dahlstrand. It notes that Dahlstrand is not mentioned in the *Pebble Beach Historic Context Statement*, prepared in 2013 by Page & Turnbull for Monterey County Parks (Pebble Beach is adjacent to both Monterey and Carmel, lying between these two cities, and the Context Statement includes a selective discussion of these communities). Dr. Lamprecht concludes her twenty-seven-page evaluation by stating that the Carmel Valley Shopping Center does not meet the criteria for significance under Criterion C: it does not "embody the distinctive of a type, period, or method of construction," it does not "represent the work of a master," and does not possess "high artistic value." In other words, it fails to meet any of the criteria for designation and is not significant as an architectural expression of Olof Dahlstrand's work.

61

3. Because there is no mention of my letter to Brandon Swanson, dated 3 January 2020, nor Barbara Lamprecht's letter to Mr. Swanson, dated April

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2021, Monterey County did not address the significant points in the two letters.

4. Among the significant points in my letter are the following:

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(a) Dr. Kozakavich was trained as an Anthropologist, not as a Historian. Both I and Dr. Lamprecht are “qualified architectural historians,” meeting the National Park Service’s requirements as stated in the Code of Federal Regulations (CFR), Title 36, Part 6. Such qualifications are required to evaluate potential historic resources under the California Environmental Quality Act (CEQA). Dr. Kozakavich’s name does not appear on the Monterey County list of Qualified Historian and Architectural Historian Consultants, updated on 29 June 2020.

63

(b) Dr. Kozakavich failed to understand the character of my evaluation of the shopping center, stating in Appendix C of her 11 October 2019 evaluation, that my letter to the owner, Russell Stanley, lacked footnotes, bibliographic references, research repositories, a map or aerial photograph of the property, and countless other documentation. When a property is evaluated and found not to be historic, Monterey County requires only a letter report, “stating why the property is not Historically significant, citing local, state, and federal criteria to support the finding.” A letter report is required rather than DPR forms in order to save the client funds. If the Monterey County employee who reads the evaluation believes that necessary information is missing in the evaluation, he or she may request it.

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(c) A variety of errors populate Dr. Kozakavich’s commentary on my evaluation, stating, for example, on page 2 that the roof on Building A, or Building 1 (beginning with the building where Safeway is located and proceeding counterclockwise around the shopping center) is crowned with a hipped roof rather than a flat roof bordered by low-pitched shed roofs. Had she bothered to look at the roof on Google Maps, she would have seen that the roof is flat, with a border of shed roofs.

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(d) She subsequently states on page 2 that the shopping center was developed by “Porter-Marquard Realty.” Although I did not mention it in my letter, the shopping center was in fact developed by Mid

- 65 cont. | Valley Associates, formed by George Clemens, Paul E. Porter, and Norman J. Craft, not Porter-Marquand Realty.
- 66 | (e) She declares as well on page 2 that when Block 2 was enlarged in 1977, it was not as I stated, “nearly four times the size of the original structure,” but “was relatively small compared to the original complex as a whole.” The addition added 8,697 square feet to what had formerly comprised 2,275 square feet. In my opinion the addition was hardly “relatively small.”
- 67 | (f) Finally, she states on page 3 much of my evaluation of the “building’s architectural significance” is “an integrity analysis.” There is no evaluation of integrity in my letter. I did not find the shopping center to be architecturally or historically significant, and as such there was no reason to consider integrity. No more than four or five sentences touch on alterations to the buildings.

68 | In April 2021 Barbara Lamprecht, M. Arch., Ph.D., wrote a letter to Brandon Swanson, Interim RMA Chief of Planning for the Monterey County Resource Management Agency. The letter made a number of points relating to the Carmel Valley Shopping Center and the architect, Olof Dahlstrand, who designed it. Among the significant points are the following:

- (a) The evaluations prepared by the firms Page & Turnbull and by Painter Preservation state that the shopping center is significant because it was designed by a master architect. While there is no doubt no doubt that he was an able and conscientious architect, there is no evidence that Olof Dahlstrand was a master architect. Among the evidence to support this supposition are the following facts: Dahlstrand does not appear in the Pacific Coast Architecture Data Base; his name is not listed in the AIA’s American Architects Directory; he wrote no books on architecture; he does not appear in Page & Turnbull’s, *Pebble Beach Historic Context Statement* (San Francisco, 2013); while he is mentioned on three occasions in Pierluigi Serraino’s *NorCalMod: Icons of Northern California Modernism* (San Francisco, 2006), the text includes no photographs of his work, no mention of his contribution to modern architecture, and no pictorial biography at the end of the volume. “Olof Dahlstrand does not meet the criteria for being a master [architect],” as Dr. Lamprecht states on page 10 of her letter to Brandon Swanson.

- 69 (b) Dahlstrand was highly skilled as a renderer, and other architects regularly retained him to produce drawing. In the course of slightly more than thirty years, he worked on approximately twenty commercial projects, as Dr. Lamprecht writes.
- 70 (c) Page & Turnbull state that Dahlstrand’s first shopping center in the Carmel area was in Carmel itself. Dr. Lamprecht, however, on page 11 of her letter, provides a more complex history of the shopping center.
- 71 (d) Dr. Lamprecht argues that Carmel Valley Shopping Center was based on the Del Monte Shopping Center, designed by John Carl Warnecke. Dahlstrand’s earliest drawings for the latter center date to 1960, six years before work on the Carmel Valley Shopping Center was begun. As she writes on page 22, a close examination of the Del Monte Shopping Center suggests it was used as a model for the Carmel Valley Shopping Center, with the two centers “share some of the same features and design strategies.”
- 72 (e) Dr. Lamprecht refutes the idea that the Center is a historic district, which is commonly interpreted as a group of buildings that may be constructed at different times by varied persons but are all related by a common theme. By contrast, Dr. Lamprecht argues that the Carmel Valley Shopping Center is a single property with multiple buildings designed by one person, at one time, as a holistic design.
- 73 (f) Comprehensively, as Dr. Lamprecht concludes on page 26, the Carmel Valley Shopping Center “is not particularly ‘Modern’ in expression but rather takes its cue from other local and prevalent styles.” In other words, Dahlstrand’s design fits in well with long established design paradigms well known in Carmel: rustic, low slung, hipped roofs, generous overhangs, and natural materials and colors. It does not ‘represent a significant and distinguishable entity [i.e., a historic district] whose components may lack individual distinction.’”

74 As I stated at the outset of this letter, the Carmel Valley Shopping Center does not appear to be eligible for listing in the National Register of Historic Places under Criterion C, the California Register of Historical Resources under Criterion 3, or

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Monterey County Local Register of Historical Resources under Criteria A5, C2.  
Dr. Lamprecht concurs with me.

Sincerely yours,



Anthony Kirk, Ph.D.

Anthony Kirk, Ph.D.  
2644 State Street, No. 22  
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24 December 2021

Russel W. Stanley  
The Stanley Group  
2275 Winchester Boulevard  
Campbell, CA 95008

Dear Mr. Stanley:

76

Olof Dahlstrand, who designed most if not all of the Carmel Valley Shopping Center, was not a master architect. Before beginning his architectural training at Cornell University in New York, he visited Taliesin, where he was impressed by the work of Frank Lloyd Wright. Following graduation in 1939, he practiced briefly in Wisconsin, then moved to San Francisco, where he served as an associate for the modernist architects Fred and Lois Langhorst. He became responsible for their practice when they took up residence in Europe. Much of Dahlstrand's work reflected the influence of Wright, although his houses were not directly derivative of Wright's architecture. In the 1950s he designed a number of Usonian houses in the San Francisco East Bay, following a design concept pioneered by Wright. Decades later a self-published book by one of the homeowners, William Welty, *Olof Dahlstrand: The Usonians, the Magnificent Seven of the East Bay* (San Francisco, 2007), featured Dahlstrand's work. None of his designs rose to a level comparable to Wrights. In 1958 Dahlstrand moved to Carmel, where he worked on a variety of projects, including the design of banks, educational buildings, shopping centers, and office buildings.

77

Stacy Kozakavich, Ph.D., takes the position in her evaluation of the Carmel Valley Shopping Center (what she calls the Mid Valley Shopping Center) that it is significant under Criterion C of the National Register of Historic Places and Criterion 3 of the California Register of Historical Resources "for its association with locally prominent architect, Olof Dahlstrand."<sup>1</sup> Although Dr. Kozakavich does not use the word "master" in connection with Dahlstrand, it is readily evident that this is the section of Criterion C/3 under which she finds the resource significant.

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"A master is a figure of generally recognized greatness in a field, a known craftsman of consummate skill, or an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality. The property must express a particular phase in the

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1. Page & Turnbull, Inc., DPR 523L, Mid-Valley Shopping Center, 39.

78 cont.

development of the master's career, an aspect of his or her work, or a particular idea or theme in his or her craft," according to National Register Bulletin 15.<sup>2</sup>

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Dr. Kozakavich fails, however, to produce evidence that Dahlstrand was indeed a master, citing a single mention in the 27 April 1962 *Eureka Humboldt Standard* to a proposed project by the "noted architect."<sup>3</sup> While many architects may be described as notable, prominent, or successful, such a description does not make them a "Master." Dahlstrand was successful in his design work, but he did not rise to the prominence of a master, even at the local level. He is among the many architects mentioned in the Carmel *Historic Context Statement*, where his name appears as Olaf Dalhstrand on one page and Olaf Dahlstrand on another. His biographical statement contains two sentences, far less than appears under the names of truly prominent Carmel architects. The single work he designed that is mentioned in the Context Statement is the Wells Fargo Bank building, constructed in 1965.<sup>4</sup> Kent Seavey, the author of the DPR nominating the structure to the Carmel Inventory of Historic Resources, calls it "an excellent example of the Wrightian Organic Style of architecture." Although nominated in 2016, the building has yet to be placed in the inventory. Dahlstrand ceased to work as an architect about 1993 and devoted the last two decades of his life to art, serving, as well, on both the Carmel planning commission and the city council.

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Dr. Diana Painter, proprietor of the Santa Rosa, California, firm Painter Preservation, echoes what Dr. Kozakavich has to say in her evaluation of the shopping center, dated 24 November 2020. In a letter to Ms. Terri Wissler Adam of the EMC Planning Group, dated 21 December 2020, Dr. Painter wrote that she obtained information on Olof Dahlstrand from Pierluigi Serraino. In an email to Dr. Painter, Serraino, wrote, "Only architects who were principles [*sic*] (in the area of modern design) gave us worthy structures. And Olof was unquestionably of them. That I am certain of beyond reasonable doubt."<sup>5</sup> Leaving aside the nearly incoherent character of what Serraino wrote, he mentions Dahlstrand on just three occasions in his book *NorCalMod: Icons of Northern California Modernism* (San Francisco, 2006). He states that Daahlstrand was not a native Californian, that he spoke on at least one occasion of the shortage of wood after WWII, and that he provided information on the importance of the "Bay Region Style." The "Bay Region Style" was, of course, not a style, lasting as it did from the 1890s through the 1960s or 1970s, but rather what two towering figures of California architectural history, David Gebhard and Harold Kirker called the "Bay Area Tradition."

2. National Park Service, National Register Bulletin 15: *How to Apply the National Register Criteria for Evaluation*, rev. ed. ([Washington D.C.], 1995), 20.
3. Page & Turnbull, Inc., DPR 523L, Mid-Valley Shopping Center, 37.
4. *Historic Context Statement: Carmel-by-the-Sea*, prepared for the City of Carmel-by-the Sea by Teresa Grimes and Leslie Heumann and updated by Architectural Resources Group, ([San Francisco, 2008]), 45, 48, 105.
5. Quoted in Diana Painter to Terri Wissler Adam, EMC Planning Group, 21 December 2020, EMC Planning Group.

In his book Serraino does not mention a single structure nor provide a single photograph of a building designed by Dahlstrand. Dr. Painter states that the architect was prolific and “able to attract prize commissions,” yet she names only three buildings designed by him over the course of a quarter century.<sup>6</sup>

81 Other sources make it evident that Olof Dahlstrand was not considered a master architect. He was never named a Fellow of the American Institute of Architects, an honor accorded designers “who have made outstanding contributions to the profession through design excellence, contributions in the field of architectural education, or to the advancement of the profession.”<sup>7</sup> He is not among the 8,400 architects listed in the Pacific Coast Architecture Database, which includes designers in California, Oregon, and Washington.<sup>8</sup> No examples of his work are included in the National Register of Historic Places, nor is he mentioned in *Architectural Record*. Although a competent architect, Olof Dahlstrand was clearly not a master. When he died at the advanced age of 97 on 17 July 2014, his obituary in the *Monterey County Herald* called him “a talented architect and artist,” devoting a single sentence to his work as an architect and a single sentence to his work as an artist. Nonetheless, Dr. Kozakavich considers him a master, though she is unable to provide any meaningful evidence to support her assertion.

82 If Olof Dahlstrand were a master architect, the Carmel Valley Shopping Center would need to express “a particular phase in the development of the master’s career, an aspect of his or her work, or a particular idea or theme in his or her craft,” according to National Register Bulletin 15.<sup>9</sup> Both Dr. Kozakavich and Dr. Painter believe that the Carmel Valley Shopping Center is significant for its design. Dr. Painter states in her letter to Terri Wissler Adam that it is “the first shopping center in the Carmel Valley to exhibit a cohesive, comprehensive modern architectural expression.” “It is also,” she writes, “the only shopping center designed in the Organic style, one of the hallmark styles in Carmel-by-the-Sea and Carmel Valley. . . .”<sup>10</sup>

83 Organic architecture, according to Cyril M. Harris, compiler of the encyclopedic *Dictionary of Architecture and Construction*, is “established in accordance with processes of nature rather than based on an imposed design.” Organic architecture emerged from the design philosophy of Frank Lloyd Wright, who believed that “a building (and its appearance) should follow forms that are in harmony with its natural environment. The materials used on the exterior should be sympathetic to the buildings locale, thereby relating the building to its setting, as if it were the result of natural growth.” Organic

6. Painter to Adam, 21 December 2020, EMC Planning Group.

7. “Fellow of the American Institute of Architects,” Wikipedia, [https://en.wikipedia.org/wiki/Fellow\\_of\\_the\\_American\\_Institute\\_of\\_Architects](https://en.wikipedia.org/wiki/Fellow_of_the_American_Institute_of_Architects), accessed 1 November 2020.

8. <http://pcad.lib.washington.edu/persons/?page=7>, accessed 1 November 2020.

9. National Park Service, National Register Bulletin 15: *How to Apply the National Register Criteria for Evaluation*, rev. ed. ([Washington D.C.], 1995), 20

10. Painter to Adam, 21 December 2020, EMC Planning Group.

83 cont.

architecture typically made use of low-pitched overhanging roofs.<sup>11</sup> There are indeed touches of Organic architecture in the shopping center, but parts of it, such as the Carmel Valley Auto Service, at the corner of Carmel Valley Road and Dorris Drive, are entirely conventional in appearance (figure 1).



1. Looking northeast at south side of Carmel Valley Auto Service, 19 August 2019. Photograph by Anthony Kirk, Ph.D.

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According to Virginia Savage McAlester, author of the preeminent guide to American houses, "Organic architecture is based on the coalescence of the built environment with nature, allowing the design to respond to the natural environment rather than impose on it. While other modern movements more often championed straight lines and orthogonal designs, Organic modernism favored natural shapes and interesting geometries." As is evident from the illustrations in her book, Organic architecture in house design expressed itself in a fundamentally different way than in the Carmel Valley Shopping Center, which is a composition of "straight lines and orthogonal designs."<sup>12</sup>

11. Cyril M. Harris, ed., *Dictionary of Architecture and Construction*, 4th ed. (New York, 2006), 685.

12. Virginia Savage McAlester, *A Field Guide to American Houses*, rev. and expanded (New York, 2013), 658. Illustrations of Organic houses are found on pp. 656-59.

85

In her evaluation of the Carmel Valley Shopping Center, Dr. Kozakavich states that it “was built in a modern style influenced by the work of Frank Lloyd Wright.” Wright, to my knowledge, designed a single small shopping center, which is located on Rodeo Drive in Beverly Hills. Called the Anderton Court Shops, it originally contained four shops and a penthouse that were reached from an angular ramp that rose three stories in height (figure 2). It is clearly a masterpiece of design, while the Carmel Valley Shopping Center is not.

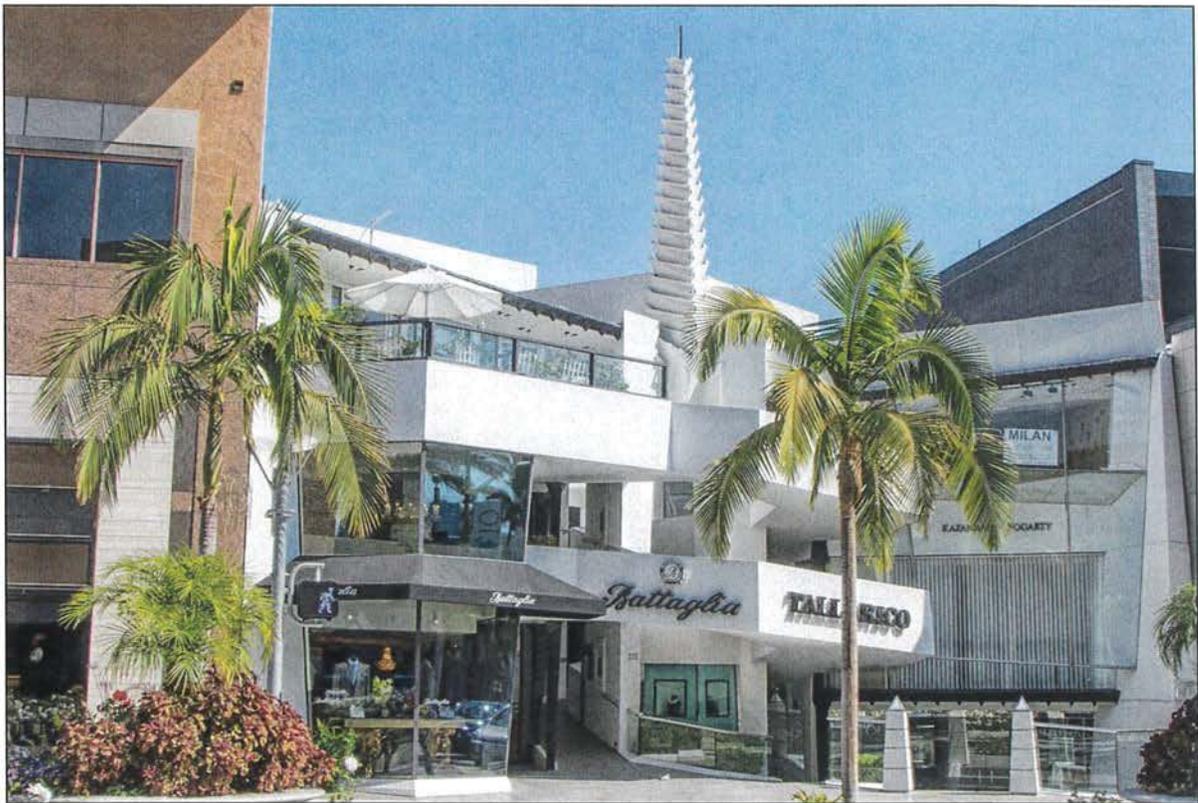


Figure 2. Anderton Court, Beverly Hills, designed in 1952 by Frank Lloyd Wright. Photograph by Anthony Kirk, Ph.D.

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Olof Dahlstrand was not a master architect. He was a competent and able architect, best known for his design of the Wells Fargo building in Carmel. Some of his work, such as the design of seven Usonian houses east of San Francisco reflected Wright’s work, though it did not rise to the level of this internationally famous architect. Dr. Kozakavich, who takes the position that he was a master, found no evidence that he was, only a single newspaper article, from Eureka, California, that called him a “noted

86 cont.

architect." He is mentioned only in passing in the *Historic Context Statement: Carmel-by-the-Sea*, which devotes substantially more space to other local architects. The architectural historian Pierluigi Serraino mentioned him briefly on three occasions, misspelling his first name, and provided no illustration of his work in his 288-page book, *NorCalMod: Icons of Northern California Modernism*. He was never named a Fellow of the American Institute of Architects. His name does not appear in the comprehensive Pacific Coast Architecture Database, which lists 8,400 architects. Although the Carmel Valley Shopping Center may be considered an expression of Organic architecture, it is clearly not a good example of the style. Dahlstrand retired early, devoting the last thirty years of his life to art and public service. To date, no evidence has appeared that suggests he was a master architect.

Sincerely yours,

A handwritten signature in blue ink that reads "Anthony Kirk". The signature is written in a cursive, flowing style.

Anthony Kirk, Ph.D

**ANTHONY LOMBARDO & ASSOCIATES**

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January 11, 2022

Our File No: 5268.000

Craig Spencer, Chief of Planning  
Monterey County  
Housing & Community Development  
1441 Schilling Place  
Salinas, CA 93901

RE: Dahlstrand as a Master Architect

Dear Craig:

87 | In reviewing our comment letter sent January 10<sup>th</sup> we found that on page 4 we quote from page 2 of DEIR Appendix G “The Kozakavich finding that the shopping center is significant as the “work of a master” is not well-supported.” We cannot however find where Ms. Kozakavich states Olof Dahlstrand was a “master.”

88 | We reviewed the Page and Turnbull (Kozakavich) October 29, 2019 memo to the Carmel Valley Association (DEIR Appendix D) and the Page and Turnbull November 18, 2019 letter to Brandon Swanson with their Phase I survey report (DEIR Appendix F). Neither document refers to Olof Dahlstrand as a “master architect.” He is simply referred to as “locally prominent” and a “noted architect” but not as a “master architect”.

89 | It is important to note and have in the record that five different qualified historians have extensively reviewed Olof Dahlstrand’s body of work. Neither Dr. Anthony Kirk, Dr. Laura Jones, Dr. Barbara Lamprecht or Ms. Kozakavich consider Olof Dahlstrand to be a “master architect”. Only Diane Painter who also refers to Olof Dahlstrand as “Locally Prominent” concludes he was a “master”.

90 | Based on the preponderance of the evidence, which is clear and convincing, Olof Dahlstrand was not a master architect. As the County prepares its response to comments and Final EIR, the County should readily conclude and clearly state Olof Dahlstrand was not a master architect and no historic significance should be accorded the Mid Valley Center as the “work of a master”.

Please feel free to call me if you have any questions.

Sincerely,



Dale Ellis  
Director of Planning and Permit Services

## Response to Letter #4

1. The commenter states that the County has not designated the shopping center to be a historic resource as defined by Monterey County Code Section 18.25.030 nor has the County made a decision that the shopping center is a historic resource under CEQA. This comment is acknowledged and does not raise an environmental issue. No changes to the draft EIR are required.
2. CEQA mandates in Section 15064(g) of the CEQA Guidelines that when expert's opinions differ, the environmental effects must be treated as significant. As stated in Section 5.0, Historical Resources, under "Disagreement Among Experts," in the draft EIR, due to the differing opinions of historic resource evaluations submitted by the applicant and those in opposition to the proposed project, the County chose to prepare a third-party, objective historic resource evaluation, prepared by Painter Preservation under contract to EMC Planning Group who is under contract to the County. This third-party evaluation serves as the primary basis in the draft EIR for determining whether the shopping center is a historical resource under CEQA and to evaluate the proposed project's significant environmental effects. However, the final determination of historical significance under CEQA of the shopping center lies with the Monterey County Planning Commission and/or the Board of Supervisors with a recommendation from County staff and the County's Historic Resources Review Board.

While the draft EIR does base its analysis on the objective historic resource evaluation (HRE) prepared by Painter Preservation, the analysis contained in the Painter Preservation historic resource evaluation summarizes, reviews, and evaluates the various arguments made by the three other architectural historians (Dr. Anthony Kirk, Page & Turnbull, and Dr. Laura Jones) whose reports were made available at the time of the Painter Preservation prepare their historic resource evaluation in December 2020. The January 2020 letter prepared by Dr. Kirk (Exhibit D of Letter #4) in response to the 2019 Page & Turnbull historic resource evaluation and the report prepared by Dr. Barbara Lamprecht of Modern Resources in April 2021 (Exhibit C of Letter #4) were not available to EMC Planning Group and Painter Preservation and therefore was not incorporated into the draft EIR analysis. Further, the draft EIR also summarizes the conclusions and evidence on the three other historic resource evaluations in Section 5.0 (see page 5-11 and 5-14). The conclusions of both the Painter Preservation HRE and the draft EIR provide an objective evaluation, impact analysis and mitigation recommendations in light of the whole record before the County and based on a thorough review of all available evidence from available sources presented at the time of preparation of the draft EIR. In addition, the draft EIR (under Section 10.0, Alternatives) addresses alternatives to the proposed project and alternatives considered but rejected.

3. The commenter provides a discussion of the requirements of CEQA. No environmental issue raised and therefore no response is required. No changes to the draft EIR are required.
4. As stated in the draft EIR, only the Planning Commission and/or the Board of Supervisors, can be make a final determination that the Mid-Valley Shopping Center is a historical resource under CEQA. In accordance with County Code Section 18.25.090(A), the Board of Supervisors has the sole authority to designate an historic resource for listing on the County's Historic Register; however, determining whether resources are a historical resource under CEQA, as well as if any significant impacts to a historical resource have occurred, can be made by either the Planning Commission and/or the Board of Supervisors. No changes to the draft EIR are required.
5. The CEQA Guidelines section (15604.5.b(2)(B)) referenced by the commenter does not exist. CEQA Guidelines end with section 15387. However, it is assumed that the commenter meant to refer to CEQA Guidelines Section 15064.5(2) which states "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." The same section of the CEQA Guidelines, in subsection 3 states, "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."

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 CEQA Guidelines) 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.

The Planning Commission and/or Board of Supervisors will review whether there is a "preponderance of evidence" to not treat the shopping center as historic; or if there is "substantial evidence" supporting a conclusion that the shopping center is historic.

No changes to the draft EIR are required.

6. The CEQA Guidelines state that social and economic effects shall not be treated as significant effects on the environment (Section 15131 of the CEQA Guidelines). However, an EIR may “trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes” (Section 15131(a) of the CEQA Guidelines). CEQA does not require an agency to evaluate the economic impacts of denying a project. However, to acknowledge the potential economic effects of the proposed project, an additional informational discussion has been added to Section 5.0, Historical Resources, under subsection 5.5, Economic Effects, of the draft EIR. See Section 3.0, Changes to the Draft EIR, for this discussion. Additional responses to the "ValBridge Property Advisor" letter are provided starting at response to comment #40.
7. This comment reiterates the conclusions of the Painter Preservation HRE and the commenter’s opinion that they are not substantiated. The Painter Preservation HRE found the shopping center to be historically significant today, not “at one time.” For more information see the evaluation and integrity analysis found in the Painter Preservation HRE, pp. 82-86 of 94. Additionally, see the historic contexts that substantiate the evaluation, including contexts on the history of shopping centers in the Carmel Valley; a profile of Dahlstrand himself and his career; influences on Dahlstrand, including Frank Lloyd Wright and Fred and Lois Langhorst; the environmental movement at the time and its influence on commercial design; changes in commercial landscape architecture design in the era; and examples of Dahlstrand’s work from a wide variety of sources. No changes to the draft EIR are required.
8. These comments are based on the “Review of Historic Significance Findings” (hereafter referred to as the Jones report) by Dr. Laura Jones for the applicant, dated October 10, 2020, which is included as Appendix G in draft EIR.
  - a. The commenter summarizes the areas of concurrence in previous letters and reports by Dr. Anthony Kirk and Page & Turnbull, as reported in the Jones report. However, this comment does not raise an environmental issue and therefore, no changes to the draft EIR are required.
  - b. The commenter summarizes the opinions and findings by Dr. Anthony Kirk, as put forth in previous letters, and the Jones report. Regarding the provenance of the service station, see response to comment #53(d)(4) for a thorough response. Regarding the source of aggregate, there is no discussion in the Painter Preservation HRE or in the draft EIR on the source of aggregate for the concrete aggregate found in the shopping center. The commenter further lists the areas of disagreement between Dr. Anthony Kirk’s letters and

the Page & Turnbull evaluation, as reported in the Jones report. These comments are not on the draft EIR; therefore, no further response is necessary. No changes to the draft EIR are required.

- c. The commenter is reiterating the findings of the Jones report. Jones' findings, as reported in this letter, are noted here in italics with a response provided thereafter.
  - i. *Dahlstrand practiced in the style of Frank Lloyd Wright.* Response: Dahlstrand incorporated elements of Wrights' design vocabulary. There is no one "style" in the work of Frank Lloyd Wright.
  - ii. *Dahlstrand is not mentioned in scholarly literature on the Organic style.* Response: The Organic style is a term used for elements seen in Dahlstrand's body of work. There are actually a number of influences seen in Dahlstrand's design of the Mid-Valley Shopping Center (see response to comment #83). The reason the term is used in the Painter Preservation HRE is because the Historic Context Statements for Carmel-by-the-Sea use this term. There is little scholarly research published on the Organic style . The main proponent of the style was Frank Lloyd Wright and some of his followers. As a result, much of the scholarly research on the Organic style revolves around Wright and a handful of architects.
  - iii. *Olof Dahlstrand was a talented artist and illustrator.* Response: Dahlstrand was artistically talented. The work he produced related to his and others' architectural production is correctly termed renderings. He excelled at architectural renderings and produced them for himself and others including the internationally known John Carl Warnecke, for whom he produced the presentation drawings for the John F. Kennedy Memorial at Arlington National Cemetery, among other projects.
  - iv. *Olof Dahlstrand is not a figure of recognized greatness.* Response: The term "recognized greatness" is a partial quote from National Park Service (NPS) Bulletin 15, p. 20. See the summary reference in the Painter Preservation HRE on the significance of Dahlstrand's work as a local master on p. 83 of 94 in the Painter Preservation HRE. See response to comment #42 and comment #50, for an explanation of how Dahlstrand's work as a local master developed in the context of his work in Monterey County and the greater San Francisco Bay Area.

- v. *The Mid-Valley Shopping Center was not the work of a master.* Response: See the reference to Dahlstrand as a “local master” above. Note that this does not take into consideration the other reason the Mid-Valley Shopping Center is significant, which is for embodying the distinctive characteristics of a type, period, or method of construction. In this case, the reference is specifically to a type, a modern suburban shopping center.
- d. The commenter is reiterating the findings of the Jones report. Jones’ findings, as reported in this letter, are noted here in italics with a response provided thereafter.
  - i. *Page & Turnbull’s conclusions that the shopping center is the work of a master is not well supported.* Response: This comment is not on the draft EIR or the Painter Preservation HRE, but on the Page & Turnbull report prepared by the project opposition. Therefore, no response is necessary and no changes to the draft EIR are required.
  - ii. *Kirk finds that the shopping center is not a significant design by Dahlstrand in comparison to other buildings designed by the architect in the Carmel area.* Response: This opinion is noted; however, it does not provide a comment on the draft EIR and therefore, no response is necessary. No changes to the draft EIR are required.
  - iii. *Dr. Jones finds that the shopping center is not significant as the work of a master based on the evidence presented.* Response: This aspect of Dahlstrand’s work is discussed in response to comment #42, and comment #50. No changes to the draft EIR are required.
- 9. These comments are based on the “Review of Historic Significance Findings” (hereafter referred to as the Jones report) by Dr. Laura Jones for the applicant, dated October 10, 2020, which is included as Appendix G in draft EIR.
  - a. The commenter indicates concurrence with findings of the Jones report. This comment contains a list of the materials and colors found in the Mid-Valley Shopping Center, as recounted in the Jones report. Note that this information is found in the Painter Preservation HRE on p. 3 of 94 and is based on the architect’s drawings for the Mid-Valley Shopping Center.

The commenter is recounting the lack of integrity found in the shopping center, as discussed in the Jones report. Note that a discussion of changes to each feature of the shopping center and the resulting integrity are found on pp. 4, 10-11, 24, 33 and 40 of 94 in the Painter Preservation HRE and in a summary analysis of the shopping center’s integrity, which is found on pp. 83-85 of 94 in the Painter Preservation HRE.

Integrity is the ability of a property to convey its significance (NPS Bulletin 15, p. 44). According to NPS guidelines, a resource must maintain most of the aspects of integrity to still convey its significance or historic character. “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” (NPS Bulletin 15, p. 44). The threshold of what constitutes sufficient integrity is different for different types of resources, and also varies depending on the reasons for which a resource is significant. For example, retail spaces, agricultural properties, and industrial resources are often given more “leeway” in consideration of their design values. Agricultural and industrial resources may accommodate more change, due to changes in technology over time or, in the case of agricultural resources, changes in the types of crops grown.

In the case of retail or commercial properties, consideration is given to changes in marketing strategies or other design considerations, such as compliance with the Americans with Disabilities Act, that might influence design. The consideration of change in the design of retail storefronts is also judged with respect to the larger building context. For example, a new one-story, metal-framed storefront in a four-story, brick masonry building will have less visual impact than a one-story storefront in a small, one-story retail building. In the case of the Mid-Valley Shopping Center, the large, overarching hip roofs of the complex are the overriding visual aspect of the development, creating visual continuity. At the same time, many of the storefronts are behind and underneath deep, covered walkways, making their visual appearance less noticeable. These covered walkways, which are continuous throughout the development, create a strong horizontal line with a deep fascia and continuous extended rafter tails that front the walkways and creates an “edge” to the rooflines. These important design features also result in the fact that individual retail storefronts are not as visible as they might otherwise be. Therefore, even though the shopping center has undergone changes, it maintains sufficient integrity to still convey its significance and historic character. No changes to the draft EIR are required.

- b. The commenter is commenting on findings in the Jones report that the shopping center is not the work of a master as a “figure of recognized greatness.” See response to comment #42 and comment #50 for further discussion of how Olof Dahlstrand was found to be a local master in the context of this development and as noted in the Painter Preservation HRE. Note also that a discussion of the shopping center as historically significant,

specifically as a good example of a type, is part of the draft EIR and the Painter Preservation HRE and is not addressed in the commenter's response. No changes to the draft EIR are required.

- c. The commenter indicates concurrence with findings presented in the Jones report, in which the commenter concurs with previous letter reports by Dr. Anthony Kirk. Dr. Jones indicates in this quote that the shopping center is not a historic resource based on a lack of integrity. For a discussion of how integrity was assessed for the shopping center, see pp. 4, 10-11, 24, 33, and 40, and summarized on pp. 83-85 in the Painter Preservation HRE. For further explanation of how integrity is assessed for retail uses, see response to comment #9(a). No changes to the draft EIR are required.
10. The comments in this section are based on a one-page "Executive Summary" (author unknown) and a 27-page Letter of Memorandum by Dr. Barbara Lamprecht, dated April 2021, written for the applicant. Dr. Lamprecht's findings, as reported in this letter, are noted here in italics with a response provided thereafter.
- a. *Dahlstrand was not a figure of recognized greatness.* Response: See responses to comments #42 and #50.
  - b. *The Mid-Valley Shopping Center does not embody the distinctive characteristics of a type, period, or method of construction.* Response: See response to comment #41.
  - c. *The Mid-Valley Shopping Center does not possess high artistic values.* Response: See response to comment #43.
  - d. *The Mid-Valley Shopping Center's design is derivative of the Del Monte Shopping Center.* Response: See response to comment #43.
  - e. *The Mid-Valley Shopping Center does not exhibit a new and thoughtful response to the pedestrian environment.* Response: See response to comment #43
  - f. *The Mid-Valley Shopping Center is not a historic district.* Response: See response to comment #44 and comment #49d.
  - g. *The Mid-Valley Shopping Center's buildings are not being demolished.* Response: See response to comment #45.

No changes to the draft EIR are required.

11. The comments in this section are based on a letter written by Dr. Anthony Kirk to Brandon Swanson with the County of Monterey and dated January 3, 2020 and attached to Letter #4. This letter was not available to EMC Planning Group or Painter Preservation prior to or during preparation of the draft EIR.

- a. *Kirk does not agree that the Mid-Valley Shopping Center is “Wrightian-inspired” and believes it does not rise to the level of a shopping center designed by Frank Lloyd Wright in Beverly Hills.* Response: See response to comment #85.
- b. *Kirk does not believe the Mid-Valley Shopping Center is eligible for listing in the National, California, or Monterey registers.* Response: See p. 83 of 94 in the Painter Preservation HRE for a formal evaluation of the significance of the Mid-Valley Shopping Center.

No changes to the draft EIR are required.

12. The comments in this section are based on a letter written by Dr. Anthony Kirk to the applicant and dated December 14, 2021 and attached to Letter #4. These comments are also based on a letter written by Dr. Anthony Kirk to the applicant and dated December 24, 2021, which is also attached to this letter. Dr. Kirk’s findings, as reported in this letter, are noted here in italics with a response provided thereafter.

- a. *Kirk is reiterating that he does not believe the Mid-Valley Shopping Center is eligible for listing in the National, California, or Monterey registers.* Response: See p. 83 of 94 in the Painter Preservation HRE for a formal evaluation of the significance of the Mid-Valley Shopping Center.
- b. *Kirk is reiterating that he does not believe the Mid-Valley Shopping Center is eligible for listing in the National, California, or Monterey registers and that Dr. Lamprecht agrees with him.* Response: See response to comments #74 & #75.
- c. *Kirk believes that Olof Dahlstrand is not a master architect.* Response: See responses to comments #42 & #50.
- d. *It is Kirk’s opinion that the Mid-Valley Shopping Center is not a good example of the Organic style of architecture.* Response: See response to comment #83.

No changes to the draft EIR are required.

13. The draft EIR addresses the severity of the project’s significant and unavoidable impacts which would occur if the project were implemented (see Section 8.0, Significant and Unavoidable Impacts, of the draft EIR for further discussion). CEQA Guidelines Section 15064.5(b), which states “a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment,” was referenced and used to evaluate the significance of effects of the proposed project. The significance of the Mid-Valley Shopping Center would be “materially impaired” because physical changes would alter in an adverse manner, defining features that justify the shopping center as a historical resource under CEQA. See the Painter Preservation HRE (DPR page 85 of 94) for a list of defining features of the shopping center. No changes to the draft EIR are required.

14. In response to this comment regarding alternative mitigation suggestions and at the suggestion of the applicant, Mitigation Measure 5-1 has been added to the draft EIR. Mitigation Measure 5-1 requires installation of an onsite photo history of the Mid-Valley Shopping Center and architect Olof Dahlstrand prior to issuance of building permits. See Section 3.0, Changes to the Draft EIR, of this final EIR. However, even with the inclusion of Mitigation Measure 5-1, the previously identified significant and unavoidable impact (Impact 5-1 from Section 5.0, Historical Resources of the draft EIR) would not be reduced to a less-than-significant level. No additional changes are necessary.
15. As stated in Section 5.0, Historical Resources, of the draft EIR, no feasible mitigation was determined based on the applicant's stated project objectives and proposed exterior alterations to the shopping center. Therefore, no mitigation was proposed; however, the alternatives presented in the draft EIR will be considered by the County Planning Commission and/or Board of Supervisors, in order to consider how to mitigate, if possible, the significant and unavoidable impacts of the proposed project. See also response to comment #14 above, regarding a new applicant-proposed mitigation measure. No additional changes to the draft EIR are required.
16. The County of Monterey hired the contracted with the team of EMC Planning Group and Painter Preservation to provide an objective and independent evaluation of the historical significance of the shopping center. As a part of that evaluation, Painter Preservation reviewed and considered the other historic evaluations, which were prepared for either the applicant or the project opponents. The evaluations provided to EMC Planning Group were included in the draft EIR and are as follows:
  - Appendix C Dr. Anthony Kirk Historic Evaluation of Carmel Valley Shopping Center (dated September 18, 2019);
  - Appendix D Page & Turnbull Preliminary Opinion of Historic Significance – Mid-Valley Shopping Center (dated October 29, 2019);
  - Appendix E Dr. Anthony Kirk rebuttal to Page & Turnbull Preliminary Opinion (dated November 4, 2019);
  - Appendix F Page & Turnbull Phase One Historic Assessment (dated November 18, 2019);
  - Appendix G Dr. Laura Jones Mid Valley Shopping Center Review of Historic Significance Findings (dated October 16, 2020); and
  - Appendix H Dr. Anthony Kirk Updated Historic Evaluation and Response to Report Written by Dr. Jones (dated November 4, 2020).

As noted in Response to Comment #2 above, the January 2020 letter prepared by Dr. Kirk (Exhibit D of Letter #4) in response to the 2019 Page & Turnbull historic resource evaluation and the report prepared by Dr. Barbara Lamprecht of Modern Resources in April 2021 (Exhibit C of Letter #4) were not provided to EMC Planning Group and therefore, were not considered in the draft EIR analysis. Section 5.0, Historical Resources, presents a summary of each of the previous historic resource evaluations provided to EMC Planning Group and Painter Preservation at the time of preparation of the draft EIR. In addition, Section 5.0 presents a summary of areas of disagreement (p. 5-14, under 5.4, Impacts Summary and Mitigation Measures). The draft EIR includes an objective and independent evaluation of the historical significance of the shopping center and considered the opinions documented in the historical evaluations listed above. No changes to the draft EIR are required.

17. This comment is regarding economic impacts. See Response to Comment #6 above.
18. The roofing materials chosen as relates to safety impacts is not a component of the environmental impact related to historical resources as identified in the draft EIR. However, if the Planning Commission and/or the Board of Supervisors, adopts a statement of overriding considerations for the proposed project, the Commission could consider the benefit of changing roofing materials. No changes to the draft EIR are required.
19. As stated previously in Response to Comments #2 and #16, while the Painter Preservation HRE serves as the primary basis for the environmental analysis of the draft EIR, Painter Preservation carefully reviewed the previous historic resource evaluations provided to EMC Planning Group. Each of the evaluations prepared by other qualified architectural historians were summarized in the body of the draft EIR and were included in their entirety as appendices to the draft EIR. Therefore, the Painter Preservation HRE was not the only professional document utilized in the draft EIR. Page 3-9 of the draft EIR specifically addresses the policy consistency analysis contained in Section 3.0, Environmental Setting. As stated in page 3-9 of the draft EIR, the policy consistency analysis uses Painter Preservation's historic resource evaluation as an objective evaluation of the project's consistency with the County's various regulations and policies related to historical resources. No changes to the draft EIR are required.
20. The responder is providing his interpretation of a direct quote from CEQA Guidelines Section 15024(a) "Focus of Review." No response is required and no changes to the draft EIR are required.
21. The responder is providing his interpretation of a direct quote from CEQA Guidelines Section 15090(a). No response is required and no changes to the draft EIR are required.

22. CEQA Guidelines Section 15125(a)(1) states: "Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence." The County has the discretion to determine an appropriate baseline based on historic conditions and due to changes at the shopping center that have occurred over time. Due to the unpermitted changes that occurred at the shopping center in 2019 (painting on concrete and aggregate piers and rafters at Building C and the covered walkway between Building A and Building C), the County has determined that the appropriate CEQA baseline is conditions at the shopping center prior to those unpermitted changes. The "no project alternative" includes resolution of the stop work order/violation that would likely include restoring the property to its pre-violation state. The language in the draft EIR is intended to recognize that the no project alternative does include some minor alterations and does not include no changes from existing conditions. No changes to the draft EIR are required.
23. The commenter is quoting from the summary of the draft EIR. Refer to Section 10.0, Alternatives, of the draft EIR for a full description of exterior alterations to the shopping center that would ensure consistency with the Secretary of the Interior's Standards (under the alternative description for Alternative 2: Design Modifications to Proposed Exterior Alterations in Compliance with the Secretary of the Interior's Standards). The current proposal would modify character defining features of the shopping center including modifying roof lines with signage and new dormers, opening and in some cases removing covered walkways around the buildings, and would cover the interglorio concrete columns. Under the "Design Modifications to Proposed Exterior Alterations in Compliance with the Secretary of the Interior's Standards " alternative, the applicant would redesign the project consistent with the Secretary of the Interior's standards. The applicant has not provided an alternative design to specifically evaluate and there are countless possibilities for alternative designs that meet the Secretary of the Interior's standards under this scenario. No changes to the draft EIR are required.
24. The commenter is quoting from the summary of the draft EIR. Refer to Section 10.0, Alternatives, of the draft EIR under 10.3, Alternatives Considered but Rejected, for a full description of the considered by rejected Affordable Housing Project alternative including an approximate calculation of possible affordable housing units that could

be accommodated on the project site. Consideration of an affordable housing project on the site as a project alternative was not considered as such an alternative would not meet any of the project objectives and would likely result in greater environmental effects including impacts to a potentially significant historical resource.

Affordable Housing Overlay designation Policy LU-2.11 of the 2010 General Plan establishes an “Affordable Housing Overlay” (AHO) designation and applies that designation to five areas (General Plan Policy LU-2.11 a):

1. Mid Carmel Valley;
2. Monterey Airport vicinity;
3. Highway 68 and Reservation Road;
4. Community Areas; and
5. Rural Centers.

There are maps available for all of these on the County website and can also find the specific policies can be referenced here:

<https://www.co.monterey.ca.us/government/departments-a-h/housing-community-development/planning-services/land-use-regulations/2010-general-plan>

The Mid Carmel Valley AHO map includes more than just the shopping center property. There are opportunities within the district for housing development that include but are not limited to the shopping center. This means that even if the shopping center had constraints to converting to housing, there is still opportunity to for housing within the AHO area. The designation of the property with an AHO overlay in the general plan provides incentives to encourage the optional development of affordable housing:

“If a property meets all of the suitability criteria [...], the property owner may voluntarily choose to develop an Affordable Housing Overlay project, rather than a use otherwise allowed by the underlying land use designation.” (General Plan Policy LU-2.11 c)

Suitability criteria include (paraphrasing):

1. The property is located within an AHO district;
2. Development will achieve levels of affordability listed in LU-2.11 b 2; and
3. A mix of housing types.

The Mid Valley AHO district is not relied upon to meet housing needs in the Housing Element. If the shopping center is found to be a historical resource it would be considered a significant impact to demolish that resource under CEQA. Demolition of the shopping center is not necessarily required in order to provide housing on that site and is not required to provide housing within the AHO area adjacent to the shopping center.

No changes to the draft EIR are required.

25. See Response to Comment #1 above. No changes to the draft EIR are required.
26. The commenter addresses two separate statements from the draft EIR, both of which are accurate. However, the commenter does not indicate how either statement is inconsistent or inadequate. No changes to the draft EIR are required.
27. The comment is presented without the context of the rest of the analysis of the draft EIR as the comment addresses a component of Section 2.0, Summary, under Section 2.6, Issues to be Resolved. The matter was resolved by selection of an independent architectural historian to review all of the available information including the reports from Dr. Kirk and Dr. Jones and provide an independent recommendation. Dr. Painter has, in response to comments on the draft EIR, also reviewed the letter from Dr. Lamprecht. Each historian has provided evidence and discussion supporting their conclusions which are recognized in the draft EIR. No error is assigned to any of the reports in the draft EIR. The Painter Preservation HRE does not require an additional peer review to determine its adequacy. See also Response to Comment #16. No changes to the draft EIR are required.
28. The commenter addresses exterior alterations that have occurred over time at the Mid-Valley Shopping Center. The County acknowledges that several exterior alterations, both permitted and unpermitted, have occurred since at least 1987. These changes over time were considered in the Painter Preservation historic resource evaluation in determining the historical significance of the shopping center. To further address this comment, a list of past permitted and unpermitted exterior alterations to the Mid-Valley Shopping Center, drawn from documentation provided in the Page & Turnbull November 2019 historic resource evaluation, has been added to the draft EIR Environmental Setting section (Section 3.0). See Section 3.0, Changes to the Draft EIR, of this final EIR for a detailed list of known exterior alterations going back to 1987. The addition of this information does not change the conclusions of the draft EIR.
29. The court cases cited by the responder conclude that the actual physical condition can, but not must, include conditions which were created without benefit of permits and approvals to establish the environmental baseline. The County, as the lead

agency, has the authority to establish the environmental baseline, which in the case of the proposed project is conditions at the shopping center prior to unpermitted exterior alterations made in 2019. See also Response to Comment #22 above. No changes to the draft EIR are required.

30. See Response to Comment #27. No changes to the draft are required.
31. The policy analysis contained in Table 3-1 assumes that the Mid-Valley Shopping Center is a historical resource under CEQA utilizing the Painter Preservation HRE conclusions which form the basis for the draft EIR analysis. However, as stated on page 3-9 in Section 3.0, Environmental Setting, the final determination of historical significance of the shopping center, and the project's consistency with the historical resource-related policies contained in the County plans and regulations listed in Table 3-1, lies with the Monterey County Planning Commission and/or Board of Supervisors. If the shopping center had not been determined to be a historical resource, then the policy consistency analysis would have found the project consistent with most if not all of the policies listed. Clarifying language has been added to the draft EIR to help make this distinction. See Section 3.0, Changes to the Draft EIR, of this final EIR.
32. The commenter requests a more complete definition of the Design Control District and its stated purpose according to Monterey County Code Section 21.44.010. The stated purpose of the Design Control District has been added to the Project Description (Section 4.0) of the draft under 4.2, Project Characteristics, and "Application." See Section 3.0, Changes to the Draft EIR, for the full added language and removed purpose language. Additionally, the draft EIR does not recommend or support designating the Mid-Valley Shopping Center as a significant historic resource under County Code; rather the draft EIR, utilizing the available expert opinion, treats the shopping center as a significant historical resource under CEQA only. The impact analysis of the draft EIR reflects this conclusion. See also Response to Comment #6 for how CEQA addresses economic impacts.
33. This EIR is only addressing the current project and cumulative projects across the defined geographic scope (Carmel Valley) with the potential to impact historical resources. The final EIR does not speculate on future projects at the shopping center. No changes to the draft EIR are required.
34. The commenter states the purpose and responsibility of the County Historic Resources Review Board as stated in County Code Section 18.25.080 but does not explain why the draft EIR's description of the Historic Resources Review Board is inadequate. No response is required and no changes to the draft EIR are required.
35. Page 5-11 of the draft EIR does direct the reader to Appendices C-H for the complete analysis and conclusions of each of the received historic resource evaluations.

Additionally, the draft EIR provides a Summary of Areas of Disagreement under Section 5.4 (page 5-14 and 5-15). The January 3, 2020 letter from Dr. Kirk to Brandon Swanson (Exhibit D of this comment letter) was not available to EMC Planning Group during preparation of the draft EIR. Therefore, this report was not included in the draft EIR. The January 3, 2020 letter from Dr. Kirk to Brandon Swanson was attached to this comment letter. The Dr. Kirk letter has been considered and is responded to more thoroughly below. No changes to the draft EIR are required.

36. The commenter is stating his disagreement with the conclusions of the Painter Preservation HRE, and has attached documentation (Exhibits B-F) with different opinions. See responses to comments 41 through 90, presented later. No changes to the draft EIR are required.
37. When a EIR is prepared, a discussion of cumulative impacts is required per CEQA Guidelines Section 15130. The draft EIR addresses both past and reasonably foreseeable cumulative impacts within the specific context of historical resources within a defined geographic scope as determined by the County (within the Carmel Valley area in unincorporated Monterey County). No changes to the draft EIR are required.
38. The commenter is commenting on the draft EIR section, Significant and Unavoidable Impacts. Refer to impact analysis for impacts associated with air quality, unique archaeological resources, noise, and transportation in Section 6.0, Other Environmental Effects. As stated on page 5-18 of the draft EIR, the feasibility and effectiveness of mitigation measures related to impacts on historical resources is based on guidance set forth in the State CEQA Guidelines Section 15126.4(b). According to §15064.5(b)(2)(A-C) of the State CEQA Guidelines, generally, a project that follows the Secretary of the Interior's Standards for Rehabilitation, shall be considered as mitigated to a level of less-than-significant impact on the historical resource. The draft EIR provided an abbreviated version of the CEQA Guidelines 15064.5 (Determining the Significance of Impacts to Archaeological and Historical Resources) under the Regulatory Setting discussion in Section 5.0, Historical Resources. In order to provide a full listing of the CEQA Guidelines Section 15064.5, the full guidelines language has been added in Section 3.0, Changes to the Draft EIR. Refer also to Responses to Comments #14 and #15.
39. The commenter is addressing Alternative 1: No Project (Return to Baseline Conditions). As previously stated in Response to Comment #6, CEQA does not require a lead agency to treat economic impacts of a proposed project as environmental impacts. The alternative analysis regarding returning the shopping center to baseline conditions utilizes general observations of the shopping center's current operations and use. However, this comment is acknowledged and the

statement “However, returning the shopping center to its baseline conditions would still allow for attracting new businesses, providing a local job base, and providing a range of businesses to local in one central location” has been removed from the draft EIR. See Section 3.0, Changes to the Draft EIR.

### ***Exhibit A***

40. The County reviewed the letter and information and determined that the ValBridge Report conclusions do not reflect the County staff’s independent judgement. There are many examples across the nation of successful historic shopping centers and districts.

Financial hardships may be considered according to the criteria contained in Section 18.25.175 of the Monterey County Code. This section allows the Historic Resources Review Board to approve or conditionally approve a permit even though it does not meet the criteria contained in Chapter 18.25, provided that the applicant “...presents facts and clear evidence demonstrating to the Review Board that failure to approve the application for a permit will cause an immediate and substantial financial hardship because of conditions peculiar to the particular structure or other feature involved, and the damage to the owner of the property is unreasonable in comparison to the benefit conferred to the community...”

The request and information submitted by the applicant for a substantial financial hardship does not appear to meet the criteria established in Section 18.25.175 primarily because no information has been provided to demonstrate or substantiate that the Mid-Valley Shopping Center cannot be remodeled or rehabilitated in a manner which would meet the Secretary of the Interior’s standards and allow a reasonable use of or return from the property to the property owner (18.25.175.C) and there has been no investigation into options for relief from economic hardship (18.25.175.D). It has not been determined with any certainty to this point that the Mid-Valley Shopping Center could not be renovated or rehabilitated within the Secretary of the Interior’s standards.

### ***Refer also to Response to Comments #6 and #39. Exhibit B***

The following responses for Exhibits B and C are based on a review by Diana Painter, Ph.D., of Painter Preservation, of Dr. Lamprecht’s Executive Summary and Letter of Memorandum. Dr. Painter’s review and responses are summarized as follows:

- The draft EIR and the Painter Preservation HRE, prepared as an independent analysis to form the basis of the draft EIR analysis, address and summarize competing professional opinions of several qualified architectural historians. As noted throughout the draft EIR, CEQA Guidelines 15064(g) states that “if there is disagreement among expert opinion supported by facts over the significance of an

effect on the environment, the Lead Agency shall treat the effect as significant and shall prepare an EIR.” The draft EIR was prepared assuming the Mid-Valley Shopping Center is a historical resource under CEQA. The report prepared by Diana Painter, Ph.D., under contract with EMC Planning Group and the County supports the CEQA conclusions that the Mid-Valley Shopping Center is historically significant. Dr. Painter found that the Mid-Valley Shopping Center meets Criteria C of the National Register of Historic Places as embodying the distinctive characteristics of a type, as the first post-war, suburban shopping center in Carmel Valley to exhibit a cohesive, comprehensive modern architectural expression, and as the work of a local master.

- The draft EIR correctly identifies that the decision regarding local significance is reserved for the Board of Supervisors.
- Olof Dahlstrand is considered a “master” architect at the local level of significance. Dahlstrand’s contributions are evaluated in the draft EIR and Painter Preservation HRE at the local (or regional) level of significance. That is the context within which Dahlstrand worked for most of his career. His significance is local (that is, regional, referring to the greater Bay Area).
- The Mid-Valley Shopping Center is not “derivative” of the John Carl Warneke-designed Del Monte Shopping Center. A neighborhood shopping center such as the Mid-Valley Shopping Center does not compare to a regional shopping center such as the Del Monte Shopping Center, except in its use of materials. In addition, Dahlstrand’s work expresses an affiliation to Frank Lloyd Wright’s influence and the tenets of Organic architecture by embracing natural forms or processes.
- The design of the Mid-Valley Shopping Center was an important work in the career of Olof Dahlstrand because it allowed him to explore the appropriate response to a suburban setting in the Carmel Valley, in contrast to the urban Carmel Plaza in downtown Carmel-by-the-Sea.

41. The commenter here lists the criteria under which a property may be eligible for listing under Criterion C of the National Register of Historic Places. A property may be eligible for listing in the National Register of Historic Places under Criterion C for any one, some, or all of the four provisions listed by the National Park Service (NPS). These are:

- Properties 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 (NPS Bulletin 15, p. 2, emphasis added).

In other words, the property may be considered a historic resource under Criteria C even if it meets just one of these criteria. The Painter Preservation HRE for the Mid-Valley Shopping Center states that the shopping center is eligible for listing in the National Register (and by extension, the California Register and the Monterey County register as a property that embodies the distinctive characteristics of a type, period, or method of construction and as the work of a master (pp. 83 of 94). For additional discussion of the work of a master at the local level of significance, see comment #42 and comment #50.

With respect to the provision, the “distinctive characteristics of a type, period, or method of construction,” the Mid-Valley Shopping Center is recommended as eligible for listing in the National Register as a type, as the first post-war, suburban shopping center in the Carmel Valley to exhibit a cohesive, comprehensive modern architectural expression. The commenter is commenting on the design of the shopping center as combining a number of styles from various sources and time periods. This can be said of many buildings and complexes, if the history of the style is analyzed and put into the context of the sources of that style. The ways in which these influences are combined and the degree to which they successfully serve the aesthetic and functional purposes of the shopping center is what is significant.

The commenter is commenting on the construction and materials of the shopping center as being common in commercial design work. At the time, the design of this shopping center presented a new model of modern stylistic design in the Carmel Valley, that stands out even today as being in contrast to the themed or eclectic shopping centers of the Carmel Valley. The commenter does not comment on the Mid-Valley Shopping Center as a type, a new model in the Carmel Valley in which the components of the center are integrated to serve the modern suburban shopper, including integrated parking and convenient, protected pedestrian walkways, which is what this criterion is intended to address in the Painter Preservation HRE.

For a summary description of how this shopping center meets this criterion, see p. 83 of 94 in the Painter Preservation HRE. The historic contexts that support and explain these conclusions are found throughout the Painter Preservation HRE. In particular, a discussion of the Mid-Valley Shopping Center in the context of shopping center development in the Carmel Valley is found on pp. 47-50 of 94 in the Painter Preservation HRE. Design influences on this center in the context of modern commercial architectural design is found on pp. 54-55, 55-57, 58-59, and 59-60 of 94 in the Painter Preservation HRE, among other references. No changes to the draft EIR are required.

42. The commenter is commenting on the work of architect Olof Dahlstrand as the work of a master, using a partial definition of the criteria as found in NPS Bulletin 15, p. 20, with a brief listing of why this is the case. (Note that the General Services Administration guidance referenced here was developed to evaluate large-scale, federal government buildings and is not necessarily relevant here). The commenter implies that Dahlstrand's works should be evaluated in the context of what would be a "master" at the national level.

The significance of a historic resource, whether an individual resource or a resource made up of multiple elements, such as a district, is judged within the framework of a context: "The key to determining whether the characteristics or associations of a particular property are significant is to consider the property within its historic context" (NPS Bulletin 15, p. 11). The NPS elaborates, "A structure is eligible as a specimen of its type or period of construction if it is an important example (within its context) of building practices of a particular time in history" (Bulletin 15, p. 18, emphasis added).

The work of a master refers to the "technical or aesthetic achievements of an architect or craftsman" (NPS Bulletin 15, p. 17). An architect's significance and contributions are assessed in relationship to the milieu in which they worked. The shopping center was identified numerous times in the Painter Preservation HRE, including in the summary evaluation (p. 83 of 94) as the work of a local master, because Dahlstrand's contributions are evaluated at the local (or regional) level of significance. That is the context within which Dahlstrand worked for most of his career. His significance is local (that is, regional, referring to the greater Bay Area). See also response to comment #50. No changes to the draft EIR are required.

43. The commenter is commenting that the Mid-Valley Shopping Center does not possess high artistic values. The Painter Preservation HRE does not promote the Mid-Valley Shopping Center as possessing high artistic values. It is found eligible for listing in the National, California, and Monterey County registers as embodying the distinctive characteristics of a type, period, or method of construction, and as the work of a local master. See p. 83 of 94 in the Painter Preservation HRE for a summary description of the significance of the shopping center. The following is a brief response to the commenter's statements supporting their assertion that the shopping center does not "possess high artistic values:"

- *The style of the shopping center is common.* Response: The design of the shopping center represented a new model in the Carmel Valley, as it was the first (and remains the only) modern (in style) shopping center in the Valley. See pp. 47-50 of 94 in the Painter Preservation HRE.

- *The features of the shopping center are not modern.* Response: The features are modern, in that they eschew traditional architectural detail, express the structure of the complex, and use natural materials to decorative effect. See p. 55 of 94 in the Painter Preservation HRE.
- *The Mid-Valley Shopping Center is derivative in design of the Del Monte Shopping Center.* Response: The Mid-Valley Shopping Center is not “derivative” of the Del Monte Shopping Center, which implies that Dahlstrand ‘copied’ his colleague John Carl Warneke in the design of the center. However, the commenter also notes that Dahlstrand developed early conceptual sketches for the Del Monte Shopping Center, which apparently preceded its design (construction for the Del Monte center began in 1967). As a result, Dahlstrand would not be copying Warnecke but perhaps working in tandem with him. Secondly, the Mid-Valley Shopping Center is a 75,000 square foot neighborhood shopping center occupying under 5.5 acres. The Del Monte Shopping Center is a 675,000 regional shopping center occupying over 37 acres. They are not comparable. See response to comment #53(d)(1).
- *The Mid-Valley Shopping Center is common, in that the center wraps around a parking lot.* Response: This was a new model for shopping center design in the Carmel Valley when it was developed. Note again that the context here is local. This became the common model in the United States after World War II, but it is the first known one of its type to appear in the Carmel Valley, which previously had strip-type commercial developments with strips of parking. For a discussion of post-war landscape design for suburban shopping centers, see pp. 59-60 of 94 in the Painter Preservation HRE.
- *The landscape and pedestrian design for the Mid-Valley Shopping Center is not “new and thoughtful,” unlike the Del Monte Center.* Response: The Mid-Valley Shopping Center was designed as a neighborhood shopping center. It is space-constrained at under 5.5 acres and is designed to appeal to the community. The Del Monte Shopping Center was designed as a regional shopping center. At over 37 acres for the buildings alone (it is additionally adjacent to significant open spaces and regional trails), the Del Monte Shopping Center is designed to have a regional draw and appeal to tourists as well. For a discussion of post-war landscape design for suburban shopping centers, see pp. 59-60 of 94 in the Painter Preservation HRE.

No changes to the draft EIR are required.

44. The commenter is commenting that the Mid-Valley Shopping Center was inappropriately evaluated as a district and it is not a district.

This is not the definition of a district as defined by the National Park Service, which is a resource that “. . . possesses a significant concentration, linkage, or continuity of sites, buildings, structures or objects united historically or aesthetically by plan or physical development” (NPS Bulletin 15, p. 5). The definition quoted by the commenter refers to the NPS’s definition of how a historic district of vernacular resources may meet Criterion C, which is not applicable here.

For a discussion of the evaluation of the Mid-Century Shopping Center as a district, see Response #49d.

No changes to the draft EIR are required.

45. The Mid-Valley Shopping Center meets Criteria C as embodying the distinctive characteristics of a type (see response to comment #41) and as the work of a local master (see response to comment #42 and comment #50), as established in the Painter Preservation HRE (see pp. 82-86 of 94). For a discussion of the character-defining features of the shopping center, see pp. 85-86 in the Painter Preservation HRE.

While the buildings of the Mid-Valley Shopping Center are not proposed to be demolished as a part of this redevelopment, character-defining features are proposed to be demolished (for example, the covered pedestrian walkway), materially altered (for example, the roof forms), or obliterated by new cladding or painting (for example, the columns and structural members). This constitutes a significant adverse effect under CEQA. No changes to the draft EIR are required.

### *Exhibit C*

46. Dr. Lamprecht summarizes her purpose for preparing the letter of memorandum along with providing a brief summary of the conclusions of the previously prepared historic resource evaluations and her qualifications. No response is required and no changes to the draft EIR are required.
47. For a discussion of how the National (Criterion C) and California (Criterion 3) criteria may be met with respect to this property, see comment #41. The property may be a historic resource with respect to the National, California or the Monterey County criteria. The Monterey County criteria quoted – with the exception of Dahlstrand’s work as a local master, which is discussed in comments #41 and #50 – are not necessarily applicable to this resource. The design of the Mid-Valley Shopping Center was an important work in his career because it allowed him to explore the appropriate response to a suburban setting in the Carmel Valley, in contrast to the urban Carmel Plaza.

The examples the author has chosen to illustrate why the Mid-Valley Shopping Center does not represent a significant milestone in Dahlstrand's career refer to buildings that are significant at the national level. The Mid-Valley Shopping Center is significant at the local level.

48. Dr. Lamprecht provides a summary of list of the previously prepared historic resource evaluations of the Mid-Valley Shopping Center. No response is required and no changes to the draft EIR are required.
49. The first (a) and second (b) paragraphs of this comment restates summary comments from the Page & Turnbull and Painter Preservation HREs. The third paragraph (c) states that it is not clear which aspects of Criteria C/3 are responded to. Note that the paragraph from the Painter Preservation HRE that is included in comment 49(b) is a summary statement. Information about which aspects of Criteria C/3 make the shopping center eligible for listing in the National and California registers can be found in the Painter Preservation HRE summary evaluation for the shopping center, which is on p. 83 of 94.

Additional responses to Comment #49 are as follows.

- *The evaluation by Dr. Barbara Lamprecht finds that the shopping center is not eligible for listing in the National Register under Criteria A or C.* Response: This comment is noted. See reference above for the conclusions of the Painter Preservation HRE in the draft EIR. No changes to the draft EIR are required.
- *The shopping center does not display high artistic values and relies on precedents established by others, particularly the Del Monte Shopping Center.* Response: See response to comment #53(d)(1) and comment #71. No changes to the draft EIR are required.
- *The shopping center does not display any more artistic characteristics than are found in other suburban shopping centers.* Response: The context for evaluating the Mid-Valley Shopping Center is the Carmel Valley. The discussion of the shopping center in the Painter Preservation HRE focuses on the design of this center and why it is different than what was previously developed in the Carmel Valley, because the context here is local. As stated in the cover letter to the Painter Preservation HRE, the Mid Valley Shopping Center is significant for its design and as the first shopping center in the Carmel Valley to exhibit a cohesive, comprehensive modern architectural expression. As such it displays a level of sophistication not previously seen in shopping center design in the valley." (p. 3 of 4 and p. 1 of 94). A discussion of the Mid-Valley Shopping Center in comparison to the other shopping centers in the Carmel Valley can be found on pp. 47-50 in the HRE. A discussion of the character-defining elements of the Mid-

Valley Shopping Center are listed on pp. 85-86 of 94 in the HRE. A summary of the unique qualities of this shopping center can be found on p. 83 of 94 in the HRE. The basis of comparison for this statement is other shopping centers in Carmel Valley, not shopping centers in other locations. No changes to the draft EIR are required.

- *The Mid-Valley Shopping Center displays design characteristics that may be found in other architectural examples throughout the Monterey Bay region.* Response: As concluded in the Painter Preservation HRE, the Mid-Valley Shopping Center is eligible for listing under Criterion C as embodying the distinctive characteristics of a type, period, or method of construction, as exhibiting a cohesive, comprehensive modern architectural expression. It is unique in the Carmel Valley, which is the appropriate context. The particular sources or names of architectural styles from which it may draw is not an environmental issue. No further response is necessary. No changes to the draft EIR are required.
- *Dahlstrand was not a master architect.* Response: See response to comment #42 and comment #50. No changes to the draft EIR are required.
- *'Wrightian Organic' sources for the architectural design of the shopping center is not strong.* Response: Agreed, but this is not an environmental issue. For further description of the styles from which the Mid-Valley center draws, see response to comment #83. No further response is necessary. No changes to the draft EIR are required.
- *Dahlstrand's work has not been widely published.* Response: The Painter Preservation HRE did not indicate that Dahlstrand's work was widely published. Refer to pp. 60-64 of 94 for the places where Dahlstrand's work is published in the Painter Preservation HRE. No changes to the draft EIR are required.
- *The Mid-Valley Shopping Center did not reflect an important phase in Dahlstrand's career.* Response: The shopping center was the first (and only) suburban shopping center designed by Dahlstrand. It is the counterpoint to Carmel Plaza, his first shopping center, which is located in the urban center of Carmel-by-the-Sea. The design of the Mid-Valley Shopping Center allowed Dahlstrand to demonstrate his response to the respective sites. No changes to the draft EIR are required.

Note that if Dahlstrand is not considered a master by the commenters, then the discussion of whether the Mid-Valley Shopping Center represents a turning point in his career, as noted here, is not relevant. Nonetheless, the Painter Preservation HRE finds that Dahlstrand was a local master and that this suburban shopping center was an important and new type of commission for him. No changes to the draft EIR are required.

- *The shopping center is not a historic district.* Response: The distinction is not relevant. The complex is historic whether evaluated as a complex made up of several buildings or a historic district made up of buildings developed at different times. Building B was constructed approximately 13 years later than most in the complex. No changes to the draft EIR are required.

50. The commenter is commenting on whether or not Olof Dahlstrand can be considered a master architect.

The Painter Preservation HRE assumes that Dahlstrand's significance as a master is at a local (or regional) level. The California Office of Historic Preservation instructs that "the significance of a historical resource is best understood and judged in relation to a historic context (Instructions for Recording Historic Resources, 1995: 9). Accordingly, Olof Dahlstrand's work as a master assumes that his work must be taken in context. The context is local.

The NPS also requires that historic significance must be evaluated in context. This is extended to include the context within which an architect or "master" may be working. The work of a master refers to the "technical or aesthetic achievements of an architect or craftsman" (NPS Bulletin 15, p. 17). The shopping center was identified in the Painter Preservation HRE as the work of a master. This is judged in context. In other words, it is assessed in relationship to the milieu in which the architect worked. His significance is local (or regional, referring to the greater Bay Area). The work of architect Olof Dahlstrand was assessed in relationship to his contributions to architecture, both his single-family residences and the work he undertook in his own firm in Carmel. His career is assessed as significant as the cumulative result of his training, including obtaining an Ivy League degree at Cornell University; his early apprenticeship with the noteworthy firm of Herbst and Kuenzli in Wisconsin, who were known for their design of prominent churches and schools in the Milwaukee area as well as buildings for Marquette University; his early professional work with the highly regarded modernist firm of Langhorst and Langhorst Associates in San Francisco; his professional position as a project manager for the internationally known firm of Skidmore, Owings and Merrill (SOM) out of their San Francisco office; and his 25-year practice in his own firm in Carmel. His contributions to the community also speak to the high regard within which he was held in Carmel, serving as he did on the Planning Commission, an advisory role in land use and design decisions, for nine years, and as a city council person, a decision-making position, for three years. His professional work as a renderer and delineator was also recognized at the national level in his work for the internationally known architect John Carl Warnecke and others, as well as in his renderings for his own projects. In other words, Dahlstrand's career and professional achievements are considered broadly as the results of his professional training, architectural positions with other

firms, his design work as an architect on his own, his community contributions and public service, and his artistic work seen in his renderings for his own work and that of other architects.

A property may be eligible for listing in the National Register at the national, state, or local level. Its significance is related to its context, which may be national or significant at the state or local level. Similarly, the work of a master may be significant at the national, state, or local level. The context for evaluating the body of work by Olof Dahlstrand is local (or regional). His work is important as it relates to the environment in which he worked. The property can be significant at the local level, reflecting the work of a local or regional master that have made their mark on the community. An example of the work of a local master is illustrated in NPS Bulletin 15 in portraying a work that represents a historic adaptation. The National Register property is noted as significant as a “local variation of significant trends in building construction or remodeling, and was the work of a local master . . .” (NPS Bulletin 15, p. 19, emphasis added).

NPS Bulletin 16 explains that a nomination must identify how, under Criterion C, a person was accomplished in his or her field and made contributions to the art, architecture, or landscape architecture of the community, state, or nation (NPS Bulletin 16, p. 51, emphasis added). An example is provided on p. 46 of the bulletin about the levels of significance that may occur in the work of a master. The Edward Jones House, is considered “an exceptional example of the craftsmanship of a regionally prominent master builder” (emphasis added). The significance of the house is at the state level. Under Criterion C, the house is considered significant in the area of Architecture for its design, as one of the best residential examples of the Arts and Crafts style in the state, and “as the work of master builder and craftsman Gustav Gustavsen,” who lived and worked in Texas (NPS Bulletin 15, p. 46).

If a resource is considered significant at the national level, it may be listed in the National Register with a national level of significance, which must be demonstrated by providing a national historic context for the resource. If it additionally has “exceptional” importance, it might be eligible as a National Historic Landmark (NHL). The bulletin states that, “only the finest or the most influential works by a master American architect are likely to be designated NHLs.” Again, evidence must be provided by comparing the resource to other similar properties (NPS Bulletin 16, p. 70). The context is national. The historic contexts for the Mid-Valley Shopping Center provided in the Painter Preservation HRE address local issues, because the level of significance for the Mid-Valley Shopping Center is local and the architect has local (or in this case regional) significance. If Olof Dahlstrand was considered a master architect at the national level, it is likely that the historic contexts for the development would also have to address a higher level of significance. No changes to the draft EIR are required.

51. The commenter is commenting on available sources of information that support or do not support the architectural work of Dahlstrand and his possible status as a “master.” Note that Dahlstrand here is being evaluated against the work of others who may be significant at the national level, whereas Dahlstrand’s greatest contribution is at the local level. Nonetheless, responses on these data sources are as follows:
- a. *The PCAD database does not include the work of Dahlstrand.* Response: The PCAD database on architecture and architects was initiated by Alan Michelson at UCLA in 2002 as a record of California architects. Since 2005 it has been based in the University of Washington, when Michelson took a position as Head of the Built Environments Library. It is maintained on a part-time basis. The database is intended to bring lesser-known architects and designers to scholar’s and the public’s attention. Olof Dahlstrand is listed in the database (personal communication, Alan Michelson, February 2022). No changes to the draft EIR are required.
  - b. *Dahlstrand did not belong to the American Institute of Architects (AIA).* Response: The AIA is a professional, members-based group. It is not necessary to be a member of the AIA to practice architecture. To practice architecture, one has to pass a board example and gain NCARB certification. The AIA directory does not include non-members, as was stated in this comment. In the Monterey Bay service area approximately 46 percent of practicing architects (including Associates) are members of AIA (personal communication, Shirmaine Jones, AIA Monterey Bay, March 2022). While being a member of the AIA is a professional credit, there are any number of reasons why an individual may prefer not to join. One may be that the architect’s market is in place and further marketing through the AIA is unnecessary. No changes to the draft EIR are required.
  - c. *Dahlstrand is not among the ‘masters’ listed in the USModernist website.* Response: The USModernist website and database contains, among other resources, the texts of 34 national architecture, design, and builder’s magazines plus an additional 25 magazines that are no longer published. It has listings for 127 prominent modernist architects (they are not referred to as masters). It has no listing of architects in California per se, although it contains a listing of Palm Springs architects and Case Study architects. Olof Dahlstrand would not be among the top 127 modernist architects in the United States because his significance is local (<https://usmodernist.org/masters.html>, accessed March 2022). No changes to the draft EIR are required.
  - d. *The fact that Dahlstrand is included in this highly-selective archives is significant.* Response: The University of California, Berkeley’s Environmental Design

Archives is a curated collection of architects and design professionals in the San Francisco Bay Area. Dahlstrand was asked to submit his archives to the collection in 2007. The archive includes extensive records of his design work and other records of his architectural career. This collection was used extensively as a resource in the Painter Preservation HRE. See for example pp. 54 and 60 of 94. (<https://archives.ced.berkeley.edu/collections/dahlstrand-olof>). No changes to the draft EIR are required.

- e. *The commenter is commenting that Dahlstrand's Dodd house was published in a 1976 compendium of architects whose work is inspired by Frank Lloyd Wright and exhibited as part of "Architecture of the Monterey Peninsula."* Response: This is a factual statement that supports Dahlstrand's importance in the local community; no response is necessary. No changes to the draft EIR are required.
- f. *The commenter is commenting on other publications that contain references to or have Dahlstrand's work as a subject.* Response: These resources and more are listed in pp. 60-64 in the Painter Preservation HRE. For a discussion of Pierluigi Serraino's coverage of Dahlstrand's work, see response to comment #80. For a discussion of Frank Lloyd Wright's influence on Dahlstrand see pp. 55-57 of 94 in the Painter Preservation HRE. This may be summarized as follows.

"Dahlstrand's work expresses an affiliation to Frank Lloyd Wright's influence and the tenets of Organic architecture by embracing natural forms or processes; the concept that a building (and its appearance) should follow forms that are in harmony with its natural environment; that the materials used on the exterior should be sympathetic to the building's locale, thereby relating the building to its setting; and that use should be made of low-pitched overhanging roofs to provide protection from the sun in the summer and to provide some weather protection in the winter. In addition, maximum use should be made of natural day lighting (Olof Dahlstrand Collection, University of California Berkeley, Environmental Design Archives)."

No changes to the draft EIR are required.

- g. *This comment addresses the fact that Dahlstrand did not write any books on architecture in his career or appear in prominent magazines.* Response: Dahlstrand did not write any books on architecture. Dahlstrand appeared twice in the prominent national architectural magazine *Architectural Record*, in the September 1950 issue and the June 1962 issue. For a discussion of Dahlstrand's career in general, see pp. 52-55 of 94 in the Painter Preservation HRE. For a summary of his career accomplishments see pp. 80-81 of 94 in the Painter Preservation HRE. No changes to the draft EIR are required.

- h. *Dahlstrand appears in three local/regional historic context statements.* Response: Historic context statements provide a general overview of the history and architectural history of an area. These documents are not likely to provide any detailed new information on any architectural practitioner but their career may be covered generally. Dahlstrand's appearance in the two local historic context statements for Carmel and Carmel Valley is discussed on pp. 45-47 of 94 in the Painter Preservation HRE. There is no particular reason that Dahlstrand would appear in the Pebble Beach Historic Context Statement since he did not live or work there. No changes to the draft EIR are required.

It was an honor for Dahlstrand to appear in the regional context statement, *Modern Design Historic Context Statement Case Report*, published by the City of San Francisco, where he was noted as affiliated with the Second Bay Tradition. Below is a quote from the document that includes mention of Dahlstrand and the other august modernists that are included on the excluded list.

"Other key architects excluded from the biography section include architects who contributed to the development of a regional Modern style, yet who never built in the City of San Francisco. These architects include: Donald Olsen, David (Beverly) Thorne, Mario Corbett, Serge Chermayeff, Olaf Dahlstrand, Harwell Hamilton Harris, Rowan Maiden, Craig Ellwood, Gilcrest Kosmak, Evelyn Hall Kosmak, William Corbett, Bruce Goff, Mark Ellis, Gordon Drake, Mark Mills, and Paul Williams [and] Raphael Soriano." (Modern Design Historic Context Statement Case Report, 2011:207).

No changes to the draft EIR are required.

- i. *Dahlstrand's record of public service is significant and his artwork noteworthy.* Response: A discussion of Dahlstrand's public service and his artistic endeavors are discussed on pp. 52-54 of 94 in the Painter Preservation HRE and in the sources cited. Both are laudable and noteworthy. Dahlstrand's exhibit record includes exhibits with the Milwaukee Art Institute, the San Francisco Museum of Art, and the Monterey Peninsula Museum of Art.

Note also that Dahlstrand's work was praised as part of the highly lauded exhibition of his and his employers Fred and Lois Langhorst's work as part of exhibition at the San Francisco Veteran's Memorial Building for the San Francisco Museum of Art in June of 1950. Notice of the exhibit, entitled "Architecture: variations within a concept: exhibition of the work of Fred Langhorst, Lois Langhorst, Olaf Dahlstrand," was published in *Architectural Record*. This is discussed on p. 64 of 94 in the Painter Preservation HRE. No changes to the draft EIR are required.

- j. *Dahlstrand's work was not necessarily noted by his peers.* Response: An interview with one person on Dahlstrand's design work and career production is not necessarily definitive. Dahlstrand's record of serving on the City of Carmel-by-the-Sea Planning Commission (nine years) and City Council (three years) is an indication of the level of respect with which he was held among his peers and in the community for his advice on design, land use and environmental issues. This information is found in the profile of Dahlstrand on pp. 52-54 of 94 in the Painter Preservation HRE. No changes to the draft EIR are required.
52. *The commenter is commenting on the status of Dahlstrand as a "master."* Response: See response to comment #42 and #50 for additional information on the ability of architects to be considered masters within a local, state, or national contexts. No changes to the draft EIR are required.
53. The following responses address the report's discussion of "Notable Commercial Buildings: Carmel Plaza, Wells Fargo Bank, and the Mid-Valley/Carmel Valley Shopping Center":
- a. *Dahlstrand completed about 20 commercial commissions in his career, out of about 75 projects that are in his archives at the University of California Berkeley Environmental Design Archives. He also spent a significant amount of time in his career completing renderings for others.* Response: The scope of Dahlstrand's career interests and activities are noted in pp. 52-54 of 94 in the Painter Preservation HRE and pp. 80-81 of 94. It is clear that he divided his time between the various activities he took part in. It is also clear that his shopping centers – Carmel Plaza and the Mid-Valley Shopping Center – were both substantial projects for a one-person office. For a list of architectural projects by Dahlstrand, see pp. 91-92 of 94 in the Painter Preservation HRE. No changes to the draft EIR are required.
- b. *The next nine pages of the commenter's comments include detailed accounts of three of Dahlstrand's commercial buildings, which focus on architectural design.* Response: The purpose of this review was not stated. A discussion of the architectural design of these three examples of Dahlstrand's work is less relevant to a discussion of the Mid-Valley Shopping Center because that center was evaluated in the Painter Preservation HRE as embodying the distinctive characteristics of a type, period, or method of construction, not for possessing high artistic values.

A comparison of these three projects as examples of a comparable type in the context of Dahlstrand's career is not directly relevant, because they are each different. Carmel Plaza is an urban, in-town shopping center. The Wells Fargo Bank is a free-standing commercial building. And the Mid-Valley Shopping Center is a suburban shopping center, which is a different type than an urban shopping center.

The first discussion is on the Carmel Plaza Shopping Center. It first focuses on whether or not Dahlstrand designed Carmel Plaza. Both this question and Carmel Plaza as an example by which to examine Dahlstrand's commercial work is not relevant to the significance of the Mid-Valley Shopping Center, in part because Carmel Plaza is lacking in integrity; little of its original appearance is apparent today.

There are many reasons why buildings can be attributed to different architects. But the most likely reason here, which is noted in Note 6, p. 54 of 94 in the Painter Preservation HRE, and is the result of a personal communication between Olof Dahlstrand and Pierluigi Serraino is that Dahlstrand was acting as Project Manager for the project when he was working for SOM in San Francisco, and when he began his own firm and moved to Carmel-by-the-Sea, the company handling the project decided to give the project to him. Nonetheless it is not a good property for comparison purposes today because it no longer retains integrity. It has no bearing on the environmental impacts on the Mid-Valley Shopping Center in Carmel Valley.

The commenter next discusses the Wells Fargo Bank in Carmel-by-the-Sea by Dahlstrand, comparing the building to the Frank Lloyd Wright-designed Walker house in Carmel and noting similarities in detailing between this building and the Mid-Valley Shopping Center. The commenter concludes that the building appears eligible for designation, which is also noted on p. 54 of 94 in the HRE. Response: If the building was listed in the National, state or Monterey County registers it would raise Dahlstrand's stature, but it is not at this time according to the City of Carmel-by-the-Sea Community Planning & Building Director, Brandon Swanson (phone conversation, March 23, 2022).

The third project that is discussed here is the Mid-Valley Shopping Center. The discussion focuses mainly on a description of the photographs shown. The narrative notes that two architectural historians have called out the center as eligible for listing in the National Register, documented in the Page & Turnbull report and the Painter Preservation HRE. Response: These are factual statements; no response is necessary and no changes to the draft EIR are required.

- c. *The next section presents background on the Del Monte Shopping Center and its design influences, including Dahlstrand's role in its design; its design features, including how its design was characterized in the Pebble Beach Historic Context Statement; the design features of contemporaneous projects on the Monterey Peninsula; and lastly, the influence of Frank Lloyd Wright on the design of architects in the area.* Response: This section is presented in the way of a discussion and is not necessarily related to the Mid-Valley Shopping Center; no response is necessary and no changes to the draft EIR are required.
- d. In this section the commenter is commenting on the Mid-Valley Shopping Center and comparing it to the Del Monte Shopping Center. They are also commenting on the method of evaluation chosen for evaluation of the Mid-Valley Shopping Center. Finally, they are commenting on individual buildings in the Mid-Valley Shopping Center and their provenance. The topic areas and Responses are noted below.
  - i. *The commenter notes the similarities between the Del Monte Shopping Center and the Mid-Valley Shopping Center.* Response: No conclusions are drawn here, therefore, no response is necessary. The following conclusions are offered here. Olof Dahlstrand and John Carl Warnecke both worked on the Del Monte Shopping Center, although John Carl Warnecke is the architect of record. The two shopping centers share design features and are both suburban shopping centers. Beyond this, however, the similarities end. The Del Monte Shopping Center is a regional center with 675,000 square feet of shops on a site that is over 37 acres in size, accessed by a state route. The Mid-Valley Shopping Center is a neighborhood center, with 75,000 square feet of shops, on a site that is less than 5.5 acres in size, accessed by what used to be a country road. Del Monte was designed to have a regional draw and additionally attract tourists. The Mid-Valley Shopping Center was designed as a neighborhood shopping center. The Del Monte Shopping Center is nine times the size of the Mid-Valley Shopping Center. There is no comparison. No changes to the draft EIR are required.
  - ii. *The commenter notes that the Mid-Valley Shopping Center should not have been evaluated as a historic district in the Painter Preservation HRE. The commenter states that the buildings are a complex, designed to a master plan, and were opened at the same time. They should have been considered as one building complex.* Response: The buildings were not constructed and opened at the same time; Building B opened approximately 13 years later than the average date of the rest of the complex. Nonetheless, the

outcome of the evaluation in the Painter Preservation HRE would not differ if the evaluation was conducted in this manner. Whether evaluated as a building complex or a historic district, the shopping center is still considered historic. No changes to the draft EIR are required.

- iii. *The commenter notes that the Safeway, an anchor building for the Mid-Valley Shopping Center, is a variation on the 1959 Wurster, Bernardi & Emmons-designed Marina Safeway in San Francisco.* Response: This is true. The Marina Safeway, with its curved roof, resembles the Safeway at this shopping center, which has been modified to take on characteristics found in other buildings in the center. The fact that the Safeway was modified from a prototypical design for the aesthetic chosen for this shopping center does not lessen its contributing status to this shopping center. No changes to the draft EIR are required.
- iv. *The design of the former service station is in doubt; it might be a Standard Oil corporate design.* Response: Service stations were typically designed as prototypes by architects and/or industrial designers (Liebs, “Gas Stations,” 104). They might then be modified to suit particular settings as they occur in the field. This former service station reflects the components of a standard service station. However, it also displays the shingle-clad hip roofs, panels with battens, and planters, that are also seen on the former bank building at the Mid-Valley Shopping Center. The design modifications are evidenced in the circa 1966 rendering for the complex. The service station did not open until 1968. It is most likely that this service station was modified by Dahlstrand as envisioned in the master plan. See pp. 58-59 of 94 in the Painter Preservation HRE for a discussion of how commercial buildings, including service stations, were modified in the 1960s to have a ‘softer,’ more environmentally friendly appearance, and fit in with their surroundings. The fact that the service station may have been modified from a prototype does not lessen its contributing status to this shopping center. No changes to the draft EIR are required.

54. The following responses address the report’s discussion of “Significance of Mid Valley/Carmel Valley Shopping Center Related to Other Centers”:

- a. *The commenter comments that it is common for post-war shopping centers to be integrated such that the car and pedestrians have some separation. The commenter also quotes the Jones report, which states that there may be better preserved examples*

*post-war shopping centers in California.* Response: The significance of the Mid-Valley Shopping Center is that it was the first one in the Carmel Valley, to our knowledge, to create a parking area that was not a strip parking area that simply paralleled a strip commercial mall, and that achieved a separation of pedestrian and parking areas through the use of covered pedestrian walkways and other design devices. See pp. 59-60 of 94 in the Painter Preservation HRE for a discussion of how commercial landscape design evolved during this time frame. Note, however, that the Mid-Valley Shopping Center is a small center. It is not a destination center and did not, through scale alone, receive a great deal of automobile traffic. No changes to the draft EIR are required.

- b. *The commenter comments that the Del Monte Shopping Center achieves pedestrian separation and an integrated landscape design.* Response: The Mid-Valley Shopping Center and the Del Monte Shopping Center are two very different properties, with different design expressions and capacities. See response to comment #53(d)(1). No changes to the draft EIR are required.
  - c. *The Linda Vista Shopping Center in San Diego is another illustration of a shopping center that achieves a more progressive integration of buildings and pedestrians.* Response: This property is in San Diego, whereas the context addressed in this project is the Carmel Valley. The Mid-Valley Shopping Center design reflected a new model for the Carmel Valley. The context for this evaluation and resulting statement of significance is local. No changes to the draft EIR are required.
  - d. *The commenter makes a number of points that support their point of view that the Mid-Valley Shopping Center is not a historic resource.* Response: All these points, have been made elsewhere in the Lamprecht report. All the points – such as the definition of a historic district used here – are discussed in the Painter Preservation HRE with the appropriate historic contexts to substantiate them. The eligibility of the Mid-Valley Shopping Center is summarized on pp. 82-86 of 94 in the Painter Preservation HRE. No changes to the draft EIR are required.
55. *The commenter repeats comments made above, but with respect to the County of Monterey Criteria for designation. In response to Criteria A.5, the commenter makes the comment that the Mid-Valley Shopping Center is not the work of a master. The commenter also comments on Criteria C.1 and C.2, although no definitive answer is provided.* Response: See response to comment #42 and comment #50 on the work of a master. See comment #47 for a discussion of the Monterey County eligibility criteria. For a list of the character-defining features of the shopping center, see pp. 85-86 in the Painter Preservation HRE. No changes to the draft EIR are required.

56. *The commenter makes the comment that the structures and rooflines of the Mid-Valley Shopping Center will remain as they have been since 1967 as a result of this project.*

Response: The changes to the rooflines of the center, as well as the materials and finishes of the shopping center, will be materially altered as a result of the project to the degree that the project constitutes a significant adverse effect to a historical resource under CEQA. See response to comment #45. No changes to the draft EIR are required.

#### ***Exhibit D***

57. The commenter is commenting on the report prepared by Page & Turnbull for the Carmel Valley Association on the Mid-Valley Shopping Center. While Painter Preservation reviewed the Page & Turnbull report, as well as the other reports included in the draft EIR appendices, the draft EIR was not prepared based upon the Page & Turnbull report, but on the independent and objective report prepared by Painter Preservation. Therefore, these comments are not on the draft EIR and no response is necessary. No changes to the draft EIR are required.

#### ***Exhibit E***

58. The commenter makes the comment that they do not believe that the Mid-Valley Shopping Center is eligible for listing in the National, California, or Monterey County registers. They also make the comment that the HRE prepared by Painter Preservation for the draft EIR on the Mid-Valley Shopping Center appears to rely on the information presented in the November 18, 2019 Phase One Historic Assessment for the property by Page & Turnbull.

The Historic Resource Report (HRE) and Phase I Assessment written by Painter Preservation for the draft EIR and dated December 21, 2020 includes original research conducted by Painter Preservation. If it bears some resemblance to the work undertaken by Page & Turnbull it is because many of the same principal sources for the report, both primary and secondary, were utilized. One of the most important resources informing both reports was the Olof Dahlstrand archives at the University of California Berkeley, Environmental Design Archives, which include 78 project files, as well as personal and office correspondence and the like. It also includes the presentation drawings for the Mid-Valley Shopping Center. Additionally, Painter Preservation was able to find additional resources on Dahlstrand, in particular his appearance in publications. Painter Preservation interviewed several people with knowledge of the significance of his work and that of his colleague, John C. Warnecke, for whom he worked on occasion. Many of these sources are summarized on p. 3 of 4 in the cover letter for the Painter Preservation HRE and discussed in more detail on pp. 60-64 of 94 in the Painter Preservation HRE. Often, if architectural

historians have the same training and skills, can access the same research materials, are looking at the same features as they exist on the ground, and hold the same values, their conclusions will be similar. In the case of the Mid-Valley Shopping Center, a knowledge of modern architecture and retail development practices is critical. No changes to the draft EIR are required.

59. The letter to Brandon Swanson, Interim RMA Chief of Planning for the Monterey Resource Management Agency, dated January 3, 2020, was not available to EMC Planning Group and Painter Preservation during preparation of the draft EIR.

See also response to comment #57 above. No changes to the draft EIR are required.

60. The commenter here notes that the Letter of Memorandum by Dr. Barbara Lamprecht (“Lamprecht report”), which had many useful comments about the historical significance of the Mid-Valley Shopping Center, was not included in the draft EIR. The Lamprecht report was not available to EMC Planning Group and Painter Preservation during preparation of the draft EIR.

Note that it is likely that the reason why Pebble Beach Historic Context Statement does not include any mention of Olof Dahlstrand is because he did not have projects there nor did he live there. He is included in both historic context statements prepared for Carmel-by-the-Sea and immediate environs. No changes to the draft EIR are required.

61. See response to comments # 59 and 60 above. No changes to the draft EIR are required.

62. See response to comment #57 above. No changes to the draft EIR are required.

63. See response to comment #57 above. No changes to the draft EIR are required.

64. See response to comment #57 above. No changes to the draft EIR are required.

65. See response to comment #57 above. No changes to the draft EIR are required.

66. See response to comment #57 above. No changes to the draft EIR are required.

67. See response to comment #57 above. No changes to the draft EIR are required.

68. The commenter is recapping an evaluation prepared by Dr. Barbara Lamprecht (Lamprecht report) on the Mid-Valley Shopping Center for the project proponent. These comments appear briefly in comments 69-73. For detailed comments on the points raised here, see the responses to comments #46-55. No changes to the draft EIR are required.

69. The commenter is stating that Olof Dahlstrand was a skilled renderer and did not produce as many architectural projects as someone who did not also do renderings might. Response: This is not relevant to the architectural significance of the Mid-Valley Shopping Center and no further response is required. No changes to the draft EIR are required.

Note that Dahlstrand had a 44-year career in architecture, including employment with two firms in San Francisco, Langhorst and Langhorst Associates and SOM, both of whom were known for their modernist views and practice at this time. During the eight years he worked for SOM, he continued his own practice on the side in residential design. He had his own firm in Carmel from 1958 to 1984, a total of 26 years. For additional discussion of Dahlstrand's career, see pp. 52-54 of 94 in the Painter Preservation HRE. For a total list of projects undertaken by Dahlstrand in his career see pp. 91-92 of 94 in the Painter Preservation HRE, which appears in Appendix A. This list of approximately 50 projects includes projects of all types, including commercial, institutional and residential design.

70. The commenter is commenting on the Lamprecht report and its expansion of the discussion of Carmel Plaza by Page & Turnbull. The Carmel Plaza shopping center no longer retains integrity and is therefore not a good representation of Dahlstrand's work, so the purpose of this discussion is not clear. Further, the discussion of who designed the initial stages of the center is not relevant, as Dahlstrand, who was previously the project manager for the project while at SOM, became the architect of record circa 1958. The fact that he 'took the project with him' when he left SOM and began his own firm in Carmel is documented in Note 17, p. 54 of 94 in the Painter Preservation HRE. More detailed responses to the Lamprecht report are contained in response to comments #46-55. No changes to the draft EIR are required.
71. The commenter is commenting on the Lamprecht report, which compares and contrasts the Mid-Valley Shopping Center, which is 75,000 square feet in size, with the Del Monte Shopping Center, which is 675,000 feet in size. It notes that the Mid-Valley Shopping Center is "derivative" of the Del Monte Center in design. Note that "derivative" is not a value in historic preservation, unless it supports the concept that one shopping center was just like another within the same service area, negating the importance of either in historic preservation terms. This is not the case here though. A neighborhood shopping center such as the Mid-Valley Shopping Center does not compare to a regional shopping center such as the Del Monte Shopping Center, except – in this case - in its use of materials. See response to comment 53(d)(1). No changes to the draft EIR are required.

72. The commenter recaps the Lamprecht report, noting that Lamprecht states that the Mid-Valley Shopping Center was evaluated in the Painter Preservation HRE as a historic district, whereas that is not the appropriate approach for evaluating this resource. Note that utilizing another evaluation method would not change the results of the Painter Preservation HRE for the Mid-Valley Shopping Center. No changes to the draft EIR are required.

73. The commenter is commenting on the Lamprecht report, which asserts that the Mid-Valley Shopping Center is not a 'Modern' development but 'takes its cues' from other local and prevalent styles. Response: The Mid-Valley Shopping Center is modern in the sense that it is a post-war, suburban shopping center that displays elements of Regional Modernism, among other influences. For further discussion of these and related conclusions, see response to comment #83.

The commenter also notes, based on the Lamprecht report, that the Mid-Valley Shopping Center does not "represent a significant and distinguishable entity whose components may lack individual distinction." This remark is intended as a critique of the methodology undertaken in the Painter Preservation HRE to evaluate the property as a historic district. Response: Note that the correct definition of a historic district is one which "... possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development" (NPS Bulletin 15, p. 5). The definition offered by Lamprecht and noted again here is the definition of what may make a historic district significant under Criterion C of the National Register. No changes to the draft EIR are required.

74. The commenter reiterates that they believe that the Mid-Valley Shopping Center is not eligible for listing in the National, California, or Monterey County registers, and that Dr. Lamprecht agrees with them. No response is necessary and no changes to the draft EIR are required.

75. See response to comment #74 above. No changes to the draft EIR are required.

### ***Exhibit F***

76. The commenter recaps the career of Olof Dahlstrand, who is profiled in additional detail in pp. 52-54 of 94 in the Painter Preservation HRE with discussions on the influences on his work. Examples of his work, including built work, unbuilt work, and renderings, are found in pp. 65-79 of 94 in the Painter Preservation HRE. His career is additionally summarized on pp. 80-81 of 94 and a list of his works is found on pp. 91-92 of 94 in the Painter Preservation HRE. One error noted in this comment is that the commenter says that Dahlstrand worked briefly in Wisconsin before moving to the West Coast. Dahlstrand actually worked for eight years for the prominent firm of Herbst and Kuenzli in Milwaukee. See response to comment #50.

The author's comment that Dahlstrand's work is not comparable to Frank Lloyd Wright's Usonian designs is noted. This argument was not made in the Painter Preservation HRE. See response to comments #55-57 for additional detail on the influence of Frank Lloyd Wright on Olof Dahlstrand and the architects of the day. No changes to the draft EIR are required.

77. The commenter is referring to the report prepared by Page & Turnbull for the Carmel Valley Association. The commenter's disagreement with the stated significance of Dahlstrand's work is noted; however, no response is necessary and no changes to the draft EIR are required.
78. This discussion focuses on two partial excerpts of the definition of the work of a master from NPS Bulletin 15. One is the 'generally recognized greatness' argument, which appears in NPS Bulletin 15, p. 20. This appears to have been taken to mean 'greatness' at a national level in discussions by Dr. Anthony Kirk, Dr. Laura Jones, and Dr. Barbara Lamprecht in the reports and letters submitted by the applicant. See responses to comment #42 and comment #50 for more discussion on the work of a master.

The argument that not all works by a master are eligible is also made in NPS Bulletin 15, p. 20. Commenters have also utilized this argument, which is not applicable because if the commenters do not believe that Dahlstrand is a master, the Mid-Valley Shopping Center cannot also be considered a lesser example within his oeuvre (body of work). The design of the Mid-Valley Shopping Center was a new type to Dahlstrand and a new type in the Carmel Valley, representing as it did the first comprehensively designed, modern suburban shopping center in Carmel Valley. Earlier centers were essentially commercial strips. Undertaking this commission allowed Dahlstrand to display his sensitivity to this semi-rural (at that time) setting, in contrast to the urban setting of the Carmel Plaza shopping center. For additional discussion of Dahlstrand's approach to setting, see pp. 48-49 of 94 in the Painter Preservation HRE. For additional discussion of shopping centers in Carmel Valley, see pp. 47-50 of 94 in the Painter Preservation HRE. No changes to the draft EIR are required.

79. See response to comment #57 above. No changes to the draft EIR are required. For additional discussion of coverage of Dahlstrand's work, see pp. 60-64 of 94 in the Painter Preservation HRE. (Note that Dahlstrand retired as an architect in 1984, not 1993).
80. Note that the quote from Pierluigi Serraino contained a typographical error, which he has since corrected. His corrected version states, "Only architects who are principled [in the area of modern design] gave us worthy structures. And Olof was

unquestionably one of them. That I am certain of beyond reasonable doubt.” (Personal communication with Pierluigi Serraino, March 21, 2022). The book *NorCalMod* actually touches on a variety of topics and profiles numerous architects and designers. For additional discussion of Serraino’s interviews with Dahlstrand and his family see pp. 3 of 4, 4 of 4; 53, 54, 57, 61, 62 and 80-81 of 94 in the *Painter Preservation HRE*. In terms of styles, different architectural historians use different terms for the same style or same influences. In fact, influences here may more appropriately be from the Second Bay Tradition (Gebhard, et al., 1976), not Bay Area Tradition, as noted in this letter. For a list of buildings by Dahlstrand see pp. 91-92 of 94 in the *Painter Preservation HRE*, contained in Appendix A, which lists about 50 projects. No changes to the draft EIR are required.

81. This comment summarizes much of the information presented by Dr. Barbara Lamprecht in her evaluation of April 2021. For a more detailed response to this letter, see response to comments #46-55. (Note that Dahlstrand’s work was published twice in *Architectural Record*, in contrast to what is stated here, in September 1950 and June 1962). The last sentence refers to the Page & Turnbull report on the Mid-Valley Shopping Center, prepared for the Carmel Valley Association. The commenter’s comments on the contents of the report are noted; however, no response is necessary and no changes to the draft EIR are required.
82. This comment offers two observations. One is a partial excerpt on the definition of a master, as outlined in NPS Bulletin 15. The other comment is that the Mid-Valley Shopping Center was considered significant for its design, as noted in both the Page & Turnbull and *Painter Preservation* reports. Since these are factual observations, no further response is necessary and no changes to the draft EIR are required.
83. This comment offers a definition of the Organic style, as found in Cyril M. Harris’s *Dictionary of Architecture and Construction* and discusses it in the context of the work of Frank Lloyd Wright. The commenter notes that there are aspects of the Organic style in the shopping center. Note that different architectural historians have different terms for different styles and building types. Further, several influences are noted in the *Painter Preservation HRE* on the design of the shopping center, including the Second Bay Tradition, Regional Modernism as interpreted in the Carmel area and Carmel Valley, and aspects of the Rustic style, as seen in the design of the shopping center. The reason that the Organic style was emphasized in the HRE is because that terminology is used in the historic context statements for Carmel-by-the-Sea and vicinity and the Mid-Valley Shopping Center is specifically mentioned as representative of the style as interpreted here.

For a discussion of Organic architecture within the context of the Painter Preservation HRE and the influence of Frank Lloyd Wright seen in Dahlstrand's work, see pp. 55-57 and p. 83 of 94 in the Painter Preservation HRE.

The commenter also notes that the design of the former service station at the corner of Carmel Valley Road and Dorris Drive is "entirely conventional in appearance." The former gas station is not entirely conventional in appearance, although the photo that is included in the letter makes it appear that way. Gas stations are typically designed by architects and/or industrial designers as prototypes. They can often be sited and modified to suit a particular setting. The elements that are not conventional, and can be seen in Dahlstrand's rendering for the gas station in the master plan, is the roof form (a cross hip roof), the roof cladding (wood shake), the paneled building cladding, which is similar to the finishes seen on the former bank building and compatible with the complex as a whole, and the planters on both sides of the building. See p. 43 of 94 in the Painter Preservation HRE for Dahlstrand's rendering for the design of the gas station as envisioned circa 1966 and pp. 41-42 of 94 for additional photos of the gas station. See pp. 58-59 of 94 in the Painter Preservation HRE for a discussion of how the environmental movement affected commercial design in this era. See comment #53(d)(4) for a discussion of the design of gas stations in this era. No changes to the draft EIR are required.

84. Different architectural historians define styles and types in different ways. Additionally, different terms can be used in different geographic areas. The Mid-Valley Shopping Center embodies aspects of the Organic style, in its use of natural materials and incorporation of large, hovering roof forms that echo the surrounding hills. Other elements are present as well, like aspects of the Second Bay Tradition and Regional Modernism, which can be seen in its treatment of local influences in building materials (such as the shingle roof) and forms, which this complex displays. The reason that the Organic style is drawn from here is because Carmel has two contexts that call the style out as being an important influence. It is a term used in the Carmel and Carmel Valley area. (Note that the commenter here uses residential examples to illustrate their point, which is inappropriate when discussing commercial architecture).

No changes to the draft EIR are required.

85. This comment refers to a comment in the Page & Turnbull report that states that the Mid-Valley Shopping Center "was built in a modern style influenced by the work of Frank Lloyd Wright." The commenter responded that Frank Lloyd Wright designed only one shopping center, which is the Beverly Hills shopping center illustrated in this comment letter. The commenter notes that this historic example is noteworthy and that the Mid-Valley Shopping Center does not resemble this example. The fact that the Mid-Valley Shopping Center does not resemble this example and the

commenter's disagreement that the Mid-Valley Shopping Center was developed in a style reminiscent of the work of Frank Lloyd Wright is not relevant to the significance of the subject shopping center. No further response is necessary and no changes to the draft EIR are required.

86. In this comment the commenter makes the point that Olof Dahlstrand is not a master architect. They also make the comment that the Page & Turnbull report does consider Dahlstrand a master architect. The commenter's disagreement with this statement is noted; however, no response is necessary and no changes to the draft EIR are required.

### *Exhibit G*

87. The commenter is commenting on the report prepared by Page & Turnbull for the Carmel Valley Association. The commenter notes a lack of conclusive evidence that the work of Olof Dahlstrand is that of a master. See response to comment #57 above. No changes to the draft EIR are required.
88. The commenter is commenting on the two reports prepared by Page & Turnbull for the Carmel Valley Association. The commenter notes that neither report refers to Olof Dahlstrand as a "master architect." See response to comment #57 above. No changes to the draft EIR are required.
89. *The commentor states that five different historians have reviewed the work of Olof Dahlstrand and not found it to be the work of a master. The commenter notes that the Painter Preservation report concludes that Dahlstrand's work is that of a master.* Response: For further background on the work of Dahlstrand see the Painter Preservation HRE. For further discussion of the methodology that informed the conclusion that Dahlstrand's work was that of a local master, see response to comments #42 and #50. No changes to the draft EIR are required.
90. See above response to comment #89. No changes to the draft EIR are required.

# 3.0 Changes to the Draft EIR

## 3.1 CEQA REQUIREMENTS

CEQA Guidelines section 15132 requires that a final EIR contain either the draft EIR or a revision of the draft EIR. This final EIR incorporates the draft EIR by reference and includes the revisions to the draft EIR, as presented on the following pages.

This section contains text from the draft EIR with changes indicated. Additions to the text are shown with underlined text (underline) and deletions are shown with strikethrough text (~~strikethrough~~). Explanatory notes in italic text (*italic*) precede each revision. The following changes are made:

## 3.2 CHANGES TO ENVIRONMENTAL SETTING (SECTION 3.0)

*In response to a comment regarding the project setting and changes over time at the Mid-Valley Shopping Center, the following discussion has been added to Section 3.0, Environmental Setting, under Section 3.1, Project Site and Vicinity Setting, which address changes over time at the shopping center.*

### **Past Exterior Alterations to the Mid-Valley Shopping Center**

According to the November 2019 Page & Turnbull historic resource evaluation, building and planning permit records on file with the County of Monterey for the years 1987-2016 suggest that alterations from that time onward consisted primarily of interior tenant improvements to different stores (Page & Turnbull 2019, DPR Form p. 29-30). However, several exterior alterations have occurred over time since at least 1987 as reflected in the list below:

- On-site sign (April 1987);
- Commercial building addition (August 1993);
- New store fronts (October 1994);
- Various site improvements – trellis, enhanced entryway, enclosures (March 1997);
- Non-illuminated enlargement extension of an existing Safeway sign (May 1997);

### 3.0 Changes to the Draft EIR

- Construction of a six-foot-tall tan color wood fence to enclose garbage containers (February 1999);
- Reroof – portion of shopping center (October 2002);
- Reroof – portion of shopping center (October 2003);
- Reroof – portion of shopping center (September 2004);
- Reroof – portion of shopping center (July 2006);
- Reroof – portion of shopping center (July 2007); and
- Reroof – portion of shopping center (November 2009).

Though not specified in permits or drawings, several additional minor alterations are evident in comparison of the complex with historic photos. These include:

- Addition of an ornamental truss and renovation of business entrance within the open cross gable at the northwest façade of Building C.
- Conversion of drive-through teller window at northeast façade of Building D to double-leaf glazed door.
- Painting of large, fixed rectangular windows at east side of southwest façade of Building D;
- Removal of gas pumps at automotive service station;
- Installation of wood panels partially obscuring windows at northwest façade of Building E;
- Painting in incompatible color (white) of concrete and aggregate piers and rafters at Building C and the covered walkway between Building A and Building C; and
- Removal of a section of roofing from a portion of the southeast façade of Building A.

*In response to a comment on the policy consistency analysis contained in Table 3-1, Historical Resources Policy Consistency Review (Monterey County 2010 General Plan, Monterey County Historic Preservation Ordinance, and Carmel Valley Master Plan), the following clarifying language has been added at the end of the paragraph included on page 3-9 of the draft EIR.*

If the evaluation in the draft EIR determined the Mid-Valley Shopping was not a historical resource, then the project would have been consistent with most, if not all, of the policies listed in Table 3-1.

### 3.3 CHANGES TO PROJECT DESCRIPTION (SECTION 4.0)

*To address a comment regarding the full purpose of the Design Control Zoning District, the following detailed purpose statement taken from Chapter 21.44.010 of the County Code has been added to the “Applications” discussion under Section 4.2, Project Characteristics found on page and replaces the previous abbreviated purpose statement.*

In accordance with County Code Section 21.44, the proposed project is subject to the County’s Design Approval process. Design Approval is the review and approval of the exterior appearance, location, size, materials and colors of proposed structures, additions, modification and fences located in an “Design Control” overlay. The Design Control overlay are those areas of the County which include "D" (design control) "S" (Site Plan Review) or "VS" (Visual Sensitivity) in their zoning as well as all parcels in the Carmel Area Land Use Plan. ~~The purpose of Design Approval is to protect the public viewshed, neighborhood characters, and the visual integrity of development with Design Control Districts. According to Chapter 21.44.010 of the County Code, the purpose of the Design Control District is to provide a district for the regulation of the location, size, configuration, materials, and colors of structures and fences, except agricultural fences, in those areas of the County of Monterey where the design review of structures is appropriate to assure protection of the public viewshed, neighborhood character, and to assure the visual integrity of certain developments without imposing undue restrictions on private property.~~

### 3.4 CHANGES TO HISTORICAL RESOURCES (SECTION 5.0)

*In response to a comment regarding determining the significance of impacts to historical resources, the full CEQA Guidelines language for Section 15064.5 has been added to the draft EIR Section 5.0, Historical Resources, under the CEQA discussion under “Regulatory Setting.” The draft EIR included only an abbreviated summary of the CEQA Guidelines language for Section 15064.5.*

According to CEQA Guidelines §15064.5, for the purposes of CEQA, historic resources are:

- ~~▪ A resource listed in, or formally determined eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (PRC §5024.1, 14 CCR, §4850 et seq);~~
- ~~▪ A resource included in a local register of historical resources, as defined in §5020.1(k) of the PRC or identified as significance in a historic resources survey meeting the requirements of §5024.1(g) of the PRC; and~~
- ~~▪ Any building, structure, object, site, or district that the lead agency determines eligible for national, state, or local landmark listing; generally, a resource shall be considered by the lead agency to be “historically significant” (and therefore a historic resource under CEQA) if the resource meets the criteria for listing on the California Register of Historical Resources (as defined in PRC §5024.1, 14 CCR, §4852).~~

*California Environmental Quality Act (§ 15064.5. Determining the Significance of Impacts to Archaeological and Historical Resources)*

- a. 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.

- b. A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.
1. Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.
  2. The significance of an historical resource is materially impaired when a project:
    - (a) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources;
    - (b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
    - (c) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.
  3. Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.
  4. A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures.
  5. When a project will affect state-owned historical resources, as described in Public Resources Code Section 5024, and the lead agency is a state agency, the lead agency shall consult with the State Historic Preservation Officer as

provided in Public Resources Code Section 5024.5. Consultation should be coordinated in a timely fashion with the preparation of environmental documents.

c. CEQA applies to effects on archaeological sites.

1. When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subdivision (a).
2. If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code, and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.
3. If an archaeological site does not meet the criteria defined in subdivision (a), but does meet the definition of a unique archeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c-f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.
4. If an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or EIR, if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

d. When an initial study identifies the existence of, or the probable likelihood, of Native American human remains within the project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code section 5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the Native American Heritage Commission.” Action implementing such an agreement is exempt from:

1. The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5).
2. The requirements of CEQA and the Coastal Act.

- e. In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps should be taken:
1. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:
    - (a) The coroner of the county in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required, and
    - (b) If the coroner determines the remains to be Native American:
      1. The coroner shall contact the Native American Heritage Commission within 24 hours.
      2. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.
      3. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code section 5097.98, or
  2. Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.
    - (a) The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission.
    - (b) The descendant identified fails to make a recommendation; or
    - (c) The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.
- f. As part of the objectives, criteria, and procedures required by Section 21082 of the Public Resources Code, a lead agency should make provisions for historical or unique archaeological resources accidentally discovered during construction. These provisions should include an immediate evaluation of the find by a qualified archaeologist. If the find is determined to be an historical or unique archaeological resource, contingency funding and a time allotment sufficient to allow for implementation of avoidance measures or appropriate mitigation should be

available. Work could continue on other parts of the building site while historical or unique archaeological resource mitigation takes place.

*In response to the applicant's comment regarding alternative mitigation suggestions, such as an onsite photo history of the Mid-Valley Shopping Center and architect Olof Dahlstrand, Mitigation Measure 5-1 has been added to the draft EIR.*

### Mitigation Measure

5-1 Prior to issuance of building permits, the applicant shall install an onsite photo display highlighting the history of the Mid-Valley Shopping Center and the work of architect, Olof Dahlstrand. The display shall feature a photo history of the shopping center and other works of Olof Dahlstrand to be placed on an exterior wall of the shopping center or in the form of a standalone display sign. The display shall be subject to the review and approval by County staff, with recommendations and input on the content and design of the display to be provided by the County's Historic Resources Review Board.

*In response to a comment addressing the potential economic and financial impacts if the Mid-Valley Shopping Center were to be deemed a historically significant, the following discussion has been added to Section 5.0, Historical Resources.*

## **3.5 ECONOMIC EFFECTS**

The CEQA Guidelines state that social and economic effects shall not be treated as significant effects on the environment (Section 15131 of the CEQA Guidelines). However, an EIR may "trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes" (Section 15131(a) of the CEQA Guidelines). CEQA does not require an agency to evaluate the economic impacts of denying a project.

However, the County does acknowledge that a determination by the Planning Commission and/or the Board of Supervisors that the Mid-Valley Shopping Center is historically significant would result in the shopping center being treated as an historical resource pursuant to CEQA and therefore the County's historic preservation policies and practices will be considered when reviewing the currently proposed alterations, and well as changes that may be proposed in the future. Such a determination could potentially have some economic impacts for the property owner as alterations to the shopping center must conform with the Secretary of the Interior's Standards for the Treatment of Historic Properties. If project or future alterations would impact the historic significance of the shopping center, it would represent a significant effect on the environment.

Should the applicant choose to pursue it, the Monterey County Code has a procedure for a substantial "financial hardship determination" (18.25.175 of the Monterey County Code). The Historic Resources Review Board may consider the request for financial hardship if requested by the applicant.

Despite a determination of historic significance potentially adding to the cost of designing alterations at the Mid-Valley Shopping Center and the time needed to permit those alterations, the shopping center would continue to function in its current capacity. Upgrades and rehabilitation of the shopping center would not be precluded and there are not anticipated physical impacts that can be traced to the economic effects of the historic determination.

### **3.6 CHANGES TO ALTERNATIVES (SECTION 10.0)**

*In response to the applicant's comment regarding Alternative 1: No Project (Return to Baseline Conditions), the following sentence has been removed from the draft EIR's discussion of Alternative 1's attainment of project objectives.*

#### **Alternative's Attainment of Project Objectives**

While this alternative would not change the shopping center's ability to continue to operate as it currently does, this alternative would not permit the applicant to revitalize or modernize the shopping center as stated in the applicant's objectives. ~~However, returning the shopping center to its baseline conditions would still allow for attracting new businesses, providing a local job base, and providing a range of businesses to local in one central location.~~ Therefore, the "no project" alternative, while still meeting some of the applicant's objectives, does not meet all objectives particularly those that would require design and visual modifications to the shopping center, as well as allowing for individual diversity and identification of businesses, that may attract a greater diversity of businesses and visitors/customers.

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# 4.0 Revised Summary

Where changes to the draft EIR text described in Section 3.0, Changes to the Draft EIR also require changes to the Summary, those changes are identified below. Additions to the text are shown with underlined text (underline) and deletions are shown with strikethrough text (~~strikethrough~~). Note that a number of additions shown in the revised summary table are completion of mitigation measure text that was presented in the draft EIR, but truncated in the summary table - the full text of all mitigation measures is included in the revised summary table.

## 4.1 CEQA REQUIREMENTS

CEQA Guidelines Section 15123 requires an EIR to contain a brief summary of the proposed project and its consequences. This summary identifies each significant effect and the proposed mitigation measures and alternatives to reduce or avoid that effect; areas of controversy known to the lead agency; and issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects.

This summary also includes a brief summary of the project description. Detailed project description information, including figures illustrating the project location and components, is included in Section 3.0 Project Description.

## 4.2 PROPOSED PROJECT SUMMARY

Monterey County Housing and Community Development - Planning Services (County) received an application for Design Approval (PLN190140) in May 2019 for proposed exterior alterations to existing buildings at the Mid-Valley Shopping Center. In accordance with County Code Section 21.44, the proposed exterior alterations are subject to the County's Design Approval process. Design Approval is the review and approval of the exterior appearance, location, size, materials and colors of proposed structures, additions, modification and fences located in an "Design Control" overlay. The Design Control overlay are those areas of the County which include "D" (design control) "S" (Site Plan Review) or "VS" (Visual Sensitivity) in their zoning as well as all parcels in the Carmel Area Land Use Plan. ~~The purpose of Design Approval is to protect the public viewshed, neighborhood characters, and the visual integrity of development with Design Control Districts. According to Chapter 21.44.010 of the County Code, the purpose of the Design Control District is to~~

provide a district for the regulation of the location, size, configuration, materials, and colors of structures and fences, except agricultural fences, in those areas of the County of Monterey where the design review of structures is appropriate to assure protection of the public viewshed, neighborhood character, and to assure the visual integrity of certain developments without imposing undue restrictions on private property.

The proposed exterior alterations include painting the building exteriors including window trim and roof facias; wrapping select aggregate concrete columns in a hardy board material that mimics rough-sawn siding; removal of the covered walkway connecting Building A and Building C; and alterations to eight roof areas on several of the buildings to provide better visibility of the tenant spaces. The major components of the roof structure would remain in these areas with the facia and major roof joists being visible. The roof areas at six corners would be removed exposing the facia and joists and substituting a bronzed aluminum decorative panel. The panels would be attached to the remaining joists and facia. New exterior paint colors, new wood vertical siding at walls and select columns and new metal roofing at the entry gable on Building C. The proposed colors include earth-inspired soft light to medium colors, including 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.

### **4.3 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES**

The proposed project would result in some significant or potentially significant impacts. Each of the significant impacts is identified in [Table 4-1, Revised Summary of Significant Impacts and Mitigation Measures](#), located on the following pages. The table lists each significant impact by topic area, mitigation measures to avoid or substantially minimize each impact, and the level of significance of each impact after implementation of the mitigation measures. Less-than-significant impacts are not included in the summary table.

### **4.4 SUMMARY OF ALTERNATIVES**

This EIR evaluates the environmental impacts of the following alternatives to the proposed project.

1. Alternative 1, No Project (Return to Baseline Conditions). The “no project” alternative assumes that the proposed project would not occur and that the white paint and Hardie Board (hardiplank) that was added without a permit would be removed. This would return the shopping center to its “baseline” condition prior to the unpermitted alterations that occurred in 2019. All proposed exterior alterations to the shopping center would not occur under the no project alternative.

**Table 4-1 Revised Summary of Significant Impacts and Mitigation Measures**

Significance Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
<b>Unique Archaeological Resources</b>			
<p><b>Impact 6-1.</b> Potential for impacts related to the inadvertent discovery of archaeological resources during project related ground disturbance and vegetation removal activities due to the sensitive archaeological project setting</p>	<p>Significant</p>	<p><b>Mitigation Measure 6-1.</b> Prior to commencement of site disturbance, the applicant shall verify that all contractors/employees involved in ground disturbing and vegetation removal activities have received training from a qualified archaeologist. The training shall address the following issues:</p> <ul style="list-style-type: none"> <li>a. Review the types of archaeological artifacts and resources that may be uncovered;</li> <li>b. Provide examples of common archaeological artifacts and resources to examine;</li> <li>c. Review what makes an archaeological resource significant to archaeologists, and local Native Americans;</li> <li>d. Describe procedures for notifying involved or interested parties in case of a new discovery;</li> <li>e. Describe reporting requirements and responsibilities of construction personnel;</li> <li>f. Review procedures that shall be used to record, evaluate, and mitigate new discoveries; and,</li> <li>g. Describe procedures that would be followed in the case of discovery of disturbed as well as intact human burials and burial-associated artifacts.</li> </ul> <p><b>Mitigation Measure 6-2.</b> Prior to commencement of any site disturbance, the applicant shall submit to the County of Monterey Housing and Community Development – Planning Services a signed letter by a qualified archaeologist reporting the date of training and a list of names and signatures of those in attendance.</p>	<p>Less than Significant</p>

Significance Impact	Significance Level without Mitigation	Mitigation Measure(s)	Significance Level after Mitigation
<b>Historical Resources</b>			
<p><b>Impact 5-1.</b> The project would "materially alter" the historical significance of the Mid-Valley Shopping Center, resulting in a substantial adverse change in the significance of a historical resource.</p>	<p>Significant and Unavoidable</p>	<p><del>No mitigation measure identified.</del>  <b>Mitigation Measure</b>                      5-1 <u>Prior to issuance of building permits, the applicant shall install an onsite photo display highlighting the history of the Mid-Valley Shopping Center and the work of architect, Olof Dahlstrand. The display shall feature a photo history of the shopping center and other works of Olof Dahlstrand to be placed on an exterior wall of the shopping center or in the form of a standalone display sign. The display shall be subject to the review and approval by County staff, with recommendations and input on the content and design of the display to be provided by the County's Historic Resources Review Board.</u></p> <p>See also Section 10.0, Alternatives, for discussion on Alternative 2: Design Modifications to Proposed Exterior Alterations in Compliance with the Secretary of the Interior's Standards. Adoption of Alternative 2 by Monterey County Planning Commission, or Board of Supervisors on appeal, would reduce project impacts associated with historical resources to a less-than-significant level.</p>	<p>Significant and Unavoidable</p>

SOURCE: EMC Planning Group 2022

2. Alternative 2, Design Modifications to Proposed Exterior Alterations in Compliance with the Secretary of the Interior's Standards. Under this alternative, certain proposed exterior alterations to the Mid-Valley Shopping Center would be modified to ensure consistency with the Secretary of the Interior's Standards.

Additionally, this EIR evaluated two other alternatives that were rejected for further consideration:

1. Alternative Location. An alternative location for the proposed improvements at the shopping center are specific to the existing shopping center location, and therefore, the proposed changes at the shopping center would not be applicable at any other location. Additionally, an alternative project location (i.e., an alternative location for construction of a new shopping center) is not a feasible alternative as there are no readily available alternate locations in Carmel Valley for a new shopping center to be constructed. Therefore, the alternate project location was rejected for evaluation.
2. Affordable Housing Project. The County general plan designation for the project site ("Visitor Accommodations/Professional Offices") includes an Affordable Housing Overlay (AHO) which would allow an affordable housing development. The project site is approximately 6 acres and could accommodate between 36 and 180 affordable housing units. Consideration of an affordable housing project on the site as a project alternative was not considered as such an alternative would not meet any of the project objectives and would likely result in greater environmental effects including demolition of a potentially significant historical resource).

If the Monterey County Planning Commission, or Board of Supervisors on appeal, finds that the property is not eligible for listing on the local, state, or national historic registers, then the County's decision would reflect a review and approval/denial of the proposed project without an impact on a historical resource.

## **4.5 AREAS OF KNOWN CONTROVERSY**

CEQA Guidelines section 15123, Summary, requires a discussion of areas of controversy known to the lead agency including issues raised by agencies and the public. The County is aware of public concern about how the proposed exterior alterations to the shopping center may impact its eligibility as a historical resource as well as concerns from neighbors about landscaping changes that have exposed neighboring residences behind the shopping center to loading/unloading areas and dumpsters used by businesses. A comment letter in response to the notice of preparation were received by the Native American Heritage Commission, included in Appendix A. The commission identified the need for the County to comply with the noticing and consultation requirements of AB 52 and SB 18. The County's actions to

comply with AB 52 is described in Section 6.0, Other Environmental Effects (under “Cultural Resources” and “Tribal Cultural Resources”). SB 18 only applies to general plan amendments and therefore, is not relevant to the proposed project.

## **4.6 ISSUES TO BE RESOLVED**

CEQA Guidelines Section 15123 requires an EIR to discuss issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects. The shopping center’s status as a historical resource is an issue to be resolved and is the subject of this EIR. In light of the differing conclusions of historic resource evaluations submitted by the applicant and those opposed to the project, the County has chosen to prepare an objective historic resource evaluation, which serves as the primary basis in this EIR for determining whether the shopping center is a historical resource under CEQA and to evaluate the proposed project’s significant environmental effects. However, the final determination of historical significance of the shopping center lies with the Monterey County Planning Commission, or Board of Supervisors on appeal. In conjunction with that determination, the Planning Commission, or Board of Supervisors on appeal, will be required to consider the analysis in this EIR, and make a decision whether to approve the proposed project, or one of the alternatives.

## Comments and Responses Sources

This section provides the document, personal communications and web sources referenced in the final EIR, Section 2.0, Comments and Responses.

Brown, Mary, Preservation Planner, City and County of San Francisco. June 12, 2011.

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[http://sfplanninggis.org/docs/Historical\\_Context\\_Statements/Modern%20Architecture%20Context%20adopted%20Jan%202011.pdf](http://sfplanninggis.org/docs/Historical_Context_Statements/Modern%20Architecture%20Context%20adopted%20Jan%202011.pdf)

Jones, Shirmaine, AIA Monterey Bay. Telephone conversation with Diana Painter, Ph.D., Painter Preservation, 23 March 2022.

Michelson, Alan, Head of Built Environments Library, College of Built Environments, University of Washington. Email message to Diana Painter, Ph.D., Painter Preservation, 7 March 2022.

USModernist website. Accessed March 23, 2022. <https://usmodernist.org/masters.html>.

Serraino, Pierluigi, architectural historian. Email message to Diana Painter, Ph.D., Painter Preservation, 21 March 2022.

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