

# Attachment D

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State of California -- The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**PRIMARY RECORD**

Primary # \_\_\_\_\_  
HRI # \_\_\_\_\_  
Trinomial \_\_\_\_\_  
NRHP Status Code \_\_\_\_\_

Other Listings \_\_\_\_\_  
Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 7

\*Resource Name or #: (Assigned by recorder) 3406 17-Mile Drive

**P1. Other Identifier:**

\*P2. Location:  Not for Publication  Unrestricted \*a. County Monterey

and (P2b and P2c or P2d. Attach a Location Map as necessary)

\*b. USGS 7.5' Quad Monterey Date 2012; Mount Diablo B.M.

c. Address 3406 17-Mile Drive City Pebble Beach Zip 93953

d. UTM: (Give more than one for large and/or linear resources) Zone ; mE/ mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate)

Monterey County APN 008-381-002

\*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting and boundaries)

The single-family residence at 3406 17-Mile Drive is a 6,853-square-foot one- and two-story wood-frame Spanish Colonial Revival house, with a partial basement, that was constructed in 1928 (DPR 523A photo and figures 1-2). The house is roughly cruciform in plan, with four wings extending from an entrance hall. It rests on a concrete perimeter foundation. The principal wing projects to the north-northeast, or the north, as it is designated in this report for simplicity and clarity, toward 17-Mile Drive. An arched wooden door, with a small light near the top, forms the primary entrance. It is set in a segmental section of the entrance hall and is protected from rain by a cantilevered balcony. At the rear of the house, a sliding-glass door, set between two large fixed windows, opens to a veranda with two blue canopies, which shield the entrance to the house and the dining table from showers. To the east of the veranda, the living-room wing extends towards the south. Two enormous windows at the end of the room extend from near the floor almost to the top of the gable and provide stunning views of the Pebble Beach Golf Links 13th tee. A walled rectangular courtyard, with a centrally placed fountain, extends to the southeast from the living room and the east wing. It is reached from a wooden door with a semicircular top that is set in a segmental integral porch on the opposite side of the (continued on page 3)

\*P3b. Resource Attributes: (List attributes and codes) HP2 – Single Family Property

\*P4. Resources Present:  Building  Structure  Object  Site  District  Element of District  Other (Isolates, etc.)



P5b. Description of Photo: (View, date, accession #) Looking south at east and north sides, 7/22/21

\*P6. Date Constructed/Age and

Sources:  Historic  
 Prehistoric  Both

1928; Alson Clark, *Wallace Neff*  
(Santa Monica, 2000)

\*P7. Owner and Address:

Grace L. Wang  
1910 Lakeshire Drive  
Walnut Creek, CA 94595

\*P8. Recorded by: (Name, affiliation, and address)

Anthony Kirk, Ph.D.  
2644 State Street, No. 22  
Santa Barbara, CA 93105

\*P9. Date Recorded: 8/6/21

\*P10. Survey Type: (Describe)

Intensive

\*P11. Report Citation: (cite survey report and other sources, or enter "none.") Page & Turnbull, *Pebble Beach Historic Context Statement* (San Francisco, 2013)

\*Attachments:  NONE  Location Map  Sketch Map  Continuation Sheet  Building, Structure and Object Record  
 Archaeological Record  District Record  Linear Feature Record  Milling Station Record  Rock Art Record  
 Artifact Record  Photograph Record  Other (List)

**BUILDING, STRUCTURE, AND OBJECT RECORD**

\*Resource Name or # (Assigned by recorder) 3406 17-Mile Drive

- B1. Historic Name: None
- B2. Common Name: None
- B3. Original Use: Single Family Residence
- B4. Present Use: Single Family Residence

\*B5. **Architectural Style:** Spanish Colonial Revival

\*B6. **Construction History:** (Construction date, alteration, and date of alterations) Constructed 1928; French doors on south side replaced with sliding-glass windows, fireplace and chimney on south side of living room moved to west side, windows on south side replaced with enormous single-light windows, 1953; one-story addition constructed at southwest corner, 1963.

\*B7. **Moved?**  No  Yes  Unknown **Date:** Unknown **Original Location:** Unknown

\*B8. **Related Features:** Servants' quarters / game room/ greenhouse

B9a. Architect: Wallace Neff

b. Builder: Unknown

\*B10. **Significance: Theme** Architecture

**Area** Pebble Beach

**Period of Significance** 1928

**Property Type** House

**Applicable Criteria** CR 3

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Address integrity.)

The property at 3406 17-Mile Drive is not associated with events that have made a significant contribution to the broad patterns of United States, California, or Pebble Beach history. It is not eligible for listing in National Register of Historic Places under Criterion A; the California Register of Historical Resources under Criterion 1, or the Monterey County Register of Historic Resources under A6. Robert Hunter, who acquired the property following the death of his father in 1927, appears to be significant for his brokerage firm, the Blankenhorn-Hunter Company, formed with David Blankenhorn, under Criterion B of the National Register, Criterion 2 of the California Register, and Criterion A3 of the Monterey County Register. Hunter maintained large offices in Los Angeles and San Francisco and chose a spot between the two cities to build his vacation home. A building more closely associated with Hunter as a businessman than the vacation home is 111 Sutter Street, at the corner of Montgomery Street, in San Francisco. Designed by the architectural firm Schultze & Weaver, the Hunter-Dunlin Building, which rises twenty-two stories, was completed in 1927. It was where the firm Blankenhorn-Hunter Company maintained their central California office. In 1997 the building was placed in the National Register of Historic Places. (continued on page 4)

B11. Additional Resource Attributes (List attributes and codes):

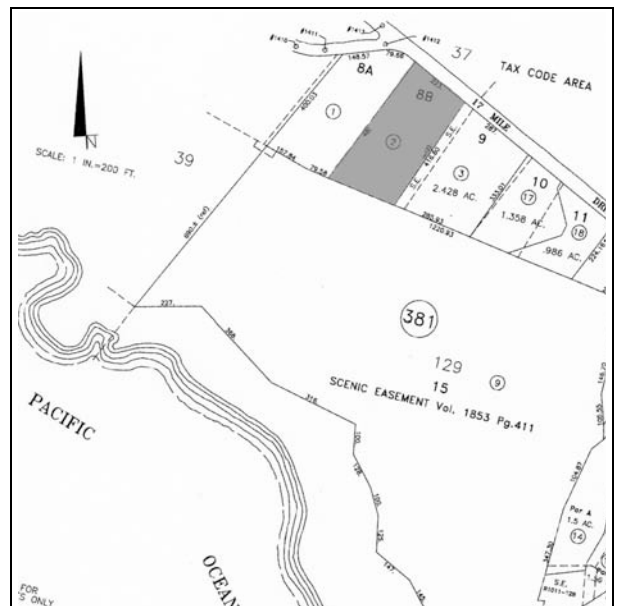
\*B12. **References:** See page 5

B13. Remarks:

\*B14. **Evaluator:** Anthony Kirk, Ph.D.

\***Date of Evaluation:** 8/6/21

(This space reserved for official comments.)



**P3a. Description:**

Revival architecture. It entrance hall from the front door. The exterior walls of the house are clad with stucco painted a cool white. The west side of the north wing has two small sections set with decorative tiles. The low-pitched hipped, gabled, and shed roofs covering the house are characterized by modest overhang and open eaves and are finished with terra-cotta tiles. Fenestration is asymmetrical and consists almost exclusively of vinyl-sash casements and casement-combination windows. Some of the windows are protected by iron or wooden grilles. Several windows on the north and east side of the north wing feature wooden shutters. An exterior chimney rises along the west wall of the living room. A second exterior chimney, with a terra-cotta cap, is set against the east wall of the dining room wing, which extends east from the entrance hall.

A porte cochère in the north wing of the house leads to a one-story wood-frame building that contains servants' quarters, a game room, and a greenhouse, the latter added in 1995 (figure 3). It is L-shaped in plan and encloses 1,396 square feet. At one time it presumably led to a detached garage as well, though there is no mention of a garage in the Residential Building Record, which was created in 1966. The building appears to date to a later time than when it was built, but a recent examination of the walls and ceiling revealed the presence of full-width framing lumber, which was used until about the end of World War II. The exterior walls are clad with stucco painted a cool white. The flat roof is finished with tar and gravel and enclosed by a low balustrade, built with coarse wooden posts and beams. Fenestration is asymmetrical and consists of a ribbon of fixed wood-sash windows on the west side, a large fixed aluminum-sash window on the south side, greenhouse windows at the southeast corner, an aluminum-sash combination window, composed of a fixed light set between two sliding lights, on the east side, and three bronze-colored sliding aluminum-sash windows on the north side. Blue cloth canopies extend over the entry at the south end of the west side and the large fixed-sash window. An exterior staircase leads to the roof. A small flat-roofed shed, with plywood siding, stands just to the west of the building.

The house and servants' quarters/game room both appear to be in good condition. They stand on a 2.35-acre parcel set between 17-Mile Drive, to the north, and the Pebble Beach Golf Links, to the south. A large lawn stretches to the fence bordering 17-Mile Drive. A large wooden double gate is suspended from two massive stone piers and opens to allow vehicles to traverse the asphalt driveway, bordered by a low hedge, to the front courtyard. At the center of the courtyard is a large elliptical garden bed, contained by a low stone wall and planted with a cherry tree, an apple tree, flowers, and low shrubs. The courtyard to the east of the living room is enlivened by a planting bed, with a bougainvillea and flowers. To the south a second large lawn stretches to the golf links. Several trees, including live oaks, are scattered about the yard.

The property in Pebble Beach was acquired in November 1924 by Edward S. Hunter and his wife, Elizabeth M. Hunter. Hunter, "one of the most prominent members of the Chicago Board of Trade," according to the *Los Angeles Times*, had begun wintering in Pasadena at the turn of the century, and upon his retirement in 1917 he lived throughout the year in southern California. Following his death in October 1927, the Pebble Beach lot passed to his son, Robert E. Hunter, who owned it with his mother, Elizabeth Hunter. Constructed in 1928, after plans by the celebrated California architect Wallace Neff, the house was a large one- and two-story wood-frame Spanish Colonial Revival house, with a partial basement. It was roughly cruciform in plan, with four wings extending from an entrance hall, and rested on a concrete perimeter foundation. The primary entrance was by way of an arched wooden door, that opened to the entrance hall at the center of the house. The door was protected from rain by a cantilevered balcony on the second floor. At the rear of the house, three sets of French doors opened from a tile-floored sun porch to a veranda. To the east of the sun porch and veranda was the living-room wing, which extended towards the south and was distinguished by a fireplace set between two large arched windows at the end of the room. The exterior walls of the house were clad with stucco painted a cool white. The west side of the north wing had two small sections set with decorative tiles. The low-pitched hipped, gabled, and shed roofs covering the house were characterized by modest overhang and open eaves and were finished with terra-cotta tiles. Fenestration was asymmetrical and consisted chiefly of wood-sash casements and casement-combination windows. Some of the windows were protected by iron or wooden grilles. An exterior chimney rose along the south wall of the living room. A second exterior chimney, with a terra-cotta cap, was set against the east wall of the dining room wing. Servant's quarters stood to the east of the porte cochère, presumably with an attached garage.

In 1953 the house was sold, and the new owners, Ralph and Genemarie Hammonds, immediately sought to improve it, retaining Robert Stanton, a prominent Monterey architect, who early in his career had worked for Wallace Neff. Stanton made two important alterations to the house. He removed the three pairs of French doors in the sun porch and replaced them with three sliding-glass doors. More significant by far, he moved the fireplace from the south end of the living room to the west side, adjoining the sun porch and verandah, and installed two enormous windows at the south end of the living room, radically altering the south side of the house. A decade later, following the death of her husband, Genemarie Hammonds and her new husband, Jesse Coe, retained the architect W. E. Ricker to design a one-story addition to the east wing, which consisted of a large bathroom, with two aluminum-sash windows. In the course of the work, an exterior chimney on the east wing was removed.

#### B10. Significance:

The Robert Hunter vacation house also appears to be significant under Criterion C of the National Register, Criterion 3 of the California Register, and Criterion B1 of the Monterey County Register as a fine example of Spanish Colonial Revival architecture. It was designed by the master architect Wallace Neff, who was born in La Mirada, California, on January 28, 1895, a grandson of Andrew McNally, founder and president of Rand McNally and Company. In 1909 the Neff family moved to Europe, hoping to find a physician to treat a serious heart condition suffered by young Marie Neff, one of Wallace's sisters. The family remained abroad until the outbreak of war, five years later. Wallace Neff studied in Vevey, Switzerland, and later in Munich. He traveled throughout Europe, visiting much of the continent. He studied drawing in Germany, where he also took up landscape painting. Returning to the United States, the Neff family settled in Altadena, and in 1915 Neff was admitted to the architectural program at the Massachusetts Institute of Technology. American entry into World War I led to the end of his studies, and he found work in the defense industry in California. His first commission following the end of hostilities was to design a weekend cottage in Santa Barbara for his mother. He considered returning to his studies at MIT, but instead found work as a designer with a real estate, insurance and construction firm, the Frank Meline Company. He obtained his architectural license in 1921 and opened his own office the following year. He was possessed of great charm and tact, and his practice was successful from the start. He was soon recognized as one of the state's most promising young architects. An article on him appeared in the *Pacific Coast Architect* in 1924, and two years later Rexford Newcomb focused on his Spanish Colonial Revival architecture in an article in *Western Architect*. His work was subsequently featured in Newcomb's *Mediterranean Domestic Architecture in the United States* (Cleveland, 1928), along with that of George Washington Smith and Reginald Johnson. In November 1928 H. Roy Kelley published an article in the *Pacific Coast Architect* that spoke of the great popularity of Neff's designs, implying his houses of the mid- and late 1920s were imitated by speculative builders more than the work of any other California architect. With the advent of the Great Depression, Neff's practice declined precipitously, and he and his wife divorced. Although Neff continued to work into the mid-1970s, his poor health ultimately forced him to give up the practice of architecture. He died in Pasadena in 1982 at the age of eighty-seven.

As built the Robert Hunter house was a fine example of Spanish Colonial Revival architecture, designed during the decade when the style was at the height of its popularity. A one- and two-story house, with a roughly cruciform plan, it possesses multi-level roofs, chiefly hipped, with a single gabled roof, and two shed roofs. The roof combination evokes the varied roof forms of Spanish villages. The exterior walls are clad with stucco, and the asymmetrical fenestration is composed chiefly of casement and casement-combination windows, with a scattering of fixed windows. The arched entrance doors, iron and wooden window grilles, cantilevered balconies, decorative tiles, an elaborated chimney cap, piers topped by *zapatas*, and an enclosed courtyard with a fountain are all features associated with fine Spanish Colonial Revival houses. There is no evidence that the house is significant under Criterion D of the National Register, Criterion 4 of the California Register, or Criterion A7

While the house is significant under the criteria of all three Registers, it has lost its historic integrity and, as such, is not eligible for listing in any of them. Integrity is the ability of a property to convey its significance. According to National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation*, it is defined by seven aspects or qualities: Location, Design, Setting, Materials, Workmanship, Feeling, and Association. The house maintains its original location. The setting, by contrast, has been altered by changes to the servants' quarter, and presumably the loss of the garage, to the east of the house. The design of the house has also been altered. The two primary elevations are the

north side, which faces 17-Mile Drive, and the south side, which may be even more clearly by golfers on the 13th tee. The earliest alterations were the work of Robert Stanton, who moved the chimney from the south side of the living room to the west side, and radically enlarged the windows at the end of the living room, almost filling the wall with glass. Stanton also removed the three pairs of French doors in the sun porch and replaced them with sliding-glass doors. At a later date, the doors were succeeded by two large fixed-sash windows flanking a sliding glass door. In 1963 the architect W. E. Ricker built a one-story addition to the east wing of the house and removed a chimney. His work, like Stanton's, is easily seen from the south side, as golfers pass the residence. At an unknown date, probably in the late 1960s or the 1970s, all the original wood-sash windows, were replaced by vinyl-sash windows, significantly altering the character of house. These changes led to the loss of both materials and workmanship and ultimately the loss of feeling. With the loss of its historic integrity, the house is no longer able to convey its original character.

#### **B12. References:**

##### *Archival Materials*

3406 17-Mile Drive file, Pebble Beach Architectural Review Office.

United States Department of the Interior, National Park Service, National Register of Historic Places, G. Bland Platt Associates, Hunter – Dunlin Building, April 17, 1997.

Pebble Beach Company, Title Book.

Residential Building Record: 3406 17-Mile Drive, Pebble Beach, California. Office of the Monterey County Assessor, Salinas, California.

##### *Newspapers*

*Los Angeles Times*, October 26, 1927; and March 30, 1971.

*The Californian* (Salinas, California), September 2, 1932.

##### *Web Sites*

“111 Sutter Street, San Francisco,” <https://www.paramount-group.com/property/111-sutter-street/> (accessed, August 3, 2021).

SFGATE, “Genemarie Hammonds,” <https://www.sfgate.com/news/article/Genemarie-Hammonds-2925981.php> (accessed August 3, 2021).

##### *Books & Pamphlets*

Clark, Alson. *Wallace Neff: Architect of California's Golden Age*. Santa Monica: Hennessey & Ingalls, 2004.

U.S. Department of the Interior. National Park Service. *How to Apply the National Register Criteria for Evaluation*. National Register Bulletin 15. Rev. ed. [Washington, D.C.:U.S. Government Printing Office], 1995.

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\*Resource Name or # (Assigned by recorder) 3406 17-Mile Drive

\*Recorded by Anthony Kirk, Ph.D.

\*Date 8/6/21

Continuation  Update



Figure 1. Looking northeast at west and south sides, 7/22/21.



Figure 2. Looking northwest at south and east sides, 7/22/21.





Figure 3. Looking northeast at west and south sides of servants' quarters, game room/green house, 7/22/21.

Margaret E. Clovis, M.A.  
14024 Reservation Rd.  
Salinas, CA. 93908  
831-210-9574

September 16, 2021

Jessica Canning, Canning Properties Group  
Sotheby's International Realty  
3775 Via Nona Marie, Suite 100  
Carmel, CA 93923

RE: Peer Review of 3406 17-Mile Drive, Pebble Beach, California  
APN: 008-381-002

Dear Ms. Canning:

In response to your recent request, I have completed a peer review of the report prepared by Dr. Anthony Kirk for the property located at 3406 17-Mile Drive, Pebble Beach, California (APN 008-381-002). His evaluation of the property, based on the criteria of the National Register of Historic Places, the California Register of Historical Resources, and the Monterey County Local Register of Historic Resources is correct. The report meets professional standards.

Based on my review of Dr. Kirk's report, I concur that the property in question does not qualify for inclusion in the aforementioned Registers.

My qualifications and experience to perform such a review span the past 42 years. After graduating from Boston University with a M.A. in Historic Preservation in 1979, I joined the firm of Charles Hall Page and Associates in San Francisco as an Architectural Historian. During that time, I consulted on preservation projects throughout the western United States. In 1981 I was hired by Monterey County as County Historian and served in that capacity for 36 years. I staffed the Monterey County Historic Resources Review Board and Historical Advisory Commission. I was responsible for the adequacy of historical reports for the purposes of CEQA and am well-versed in the criteria for the Monterey County, California, and National Registers. For the past three years I was employed by the National Trust for Historic Preservation as Historian for the Cooper-Molera Adobe in Monterey. I am currently consulting Historian for the cities of Carmel-by-the-Sea and Monterey. I am a certified Historian and Architectural Historian with Monterey County.

Historians use *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*<sup>1</sup> as a guide when evaluating a property's significance whether on a local, state, or national level. To qualify as a significant historic resource the property must be evaluated within its historic context. For properties located in Pebble Beach historians reference the *Pebble Beach*

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<sup>1</sup> *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. National Park Service, 1997.

*Historic Context Statement*<sup>2</sup>. A significant property must represent an important part of the identified context and must have the characteristics that make it a good representative of properties associated with that aspect of the past. Dr. Kirk did not reference the *Pebble Beach Historic Context Statement* in his Phase One report; however, his conclusions are consistent with its criteria requirements and integrity thresholds. This peer review will elaborate on both.

Dr. Kirk's research reveals that the Robert E. Hunter House, known as Fairview, was built as the family's vacation home in 1928. Prominent architect Wallace Neff designed the large Spanish Colonial Revival house which overlooks the 13<sup>th</sup> hole of the Pebble Beach Golf Links and the ocean beyond. The house was sold in 1953 to Ralph and Genemarie Hammonds. The couple hired architect Robert Stanton to make some dramatic changes to the house including moving the fireplace and adding enormous windows in the living room. A final addition to the east wing, designed by architect W.E. Ricker, was made by Mrs. Hammonds in 1963.

To be considered significant under Criterion A (National Register), Criterion 1 (California Register), and Criteria A6 (Monterey County Register), a property must be associated with events that have made a significant contribution to the broad patterns of our history. This can be a specific event, pattern of events, or trend. The *Pebble Beach Historic Context Statement* notes that the primary theme for residential properties built between 1919 and 1945 focuses on Samuel Morse and the Del Monte Properties Company planned development of the Pebble Beach area.

Dr. Kirk concludes that 3406 17-Mile Drive is not associated with events that have made a significant contribution to Pebble Beach history. The *Pebble Beach Historic Context Statement* supports his assertion by pointing out that groups of residences from this era best convey Samuel Morse's planned development of Pebble Beach during the era between 1905 and 1945. I concur with Dr. Kirk that 3406 17-Mile Drive is not significant under Criterion A (National Register), Criterion 1 (California Register), and Criteria A1-2 (Monterey County Register).

For a property to be listed under Criterion B (National Register), Criterion 2 (California Register), or Criterion A3 (Monterey County Register) it must be associated with a person who is significant on the local, state, or national level. An individual must have made contributions or played a role that can be justified as significant and the contributions of the individual must be compared to others who were active, successful, prosperous or influential in the same sphere of interest. The justification must be substantiated through accepted methods of research and analysis.

Robert Hunter was a partner in the successful brokerage firm of Blankenhorn-Hunter Company and made significant contributions to the growth of the financial sector in California during the first half of the twentieth century. He had family ties with Pebble Beach and therefore it made sense to build his vacation home on the central coast. Per *Bulletin 15*, properties that best represent a person's historic contributions are those associated with their productive life. Length of association is important as well. As Dr. Kirk points out, Mr. Hunter's business success is best represented by the Hunter-Dulin Building in San Francisco, which is already listed on the National Register of Historic Places. Therefore, I concur with Dr. Kirk's determination that the

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<sup>2</sup> Page & Turnbull, Inc. *Pebble Beach Historic Context Statement*. Prepared for Monterey County Parks Department. San Francisco: Page & Turnbull, Inc., 2013.

property is not significant under Criterion B (National Register), Criterion 2 (California Register), or Criterion A3 (Monterey County Register).

To be considered significant under Criterion C (National Register), Criterion 3 (California Register), or Criteria A5 and B1-3 (Monterey County Register) a resource must meet at least one of the following requirements:

- Embody distinctive characteristics of a type, period, or method of construction.
- Represent the work of a master.
- Possess high artistic value.

Per *National Register Bulletin 15*, to be eligible under Criterion C, a property must clearly contain enough distinctive characteristics to be considered a true representative of a particular type, period, or method of construction. Dr Kirk concludes that 3406 17-Mile Drive meets the aforementioned eligibility criteria because it is a fine example of the Spanish Colonial Revival style of architecture, and it was designed by master architect Wallace Neff. Finally, the property does not possess high artistic value because it does not express aesthetic ideals or design concepts. I concur with Dr. Kirk that 3406 17-Mile Drive embodies the distinctive characteristics of a type and represents the work of a master and therefore meets the eligibility criteria for Criterion C (National Register), Criterion 3 (California Register), and Criteria A5, and B1-3 (Monterey County Register).

To be listed in the federal, state, or local registers a property must be determined significant based on prescribed criteria, but it also must have integrity. Integrity is defined as a property's ability to convey its significance. The *Pebble Beach Historic Context Statement* elaborates on integrity thresholds necessary for historic resources in Pebble Beach associated with the period 1919 to 1945:

“In order to be eligible for listing in the local, state, or national historic registers, a residential property from this period must retain sufficient integrity to convey its significance in association with residential development during this period. While most buildings undergo change over time, alterations should not significantly change the essential historic character of the buildings. The aspects of integrity deemed most important for this period are design, materials, workmanship and feeling. Buildings would typically meet the threshold for addition to the local register if they meet the minimum eligibility requirements<sup>3</sup>. Buildings qualified as individual resources at the state or national level should retain most of their original features.”

The Robert E. Hunter house does not meet the minimum eligibility requirements listed in the *Pebble Beach Historic Context Statement* because the original pattern of windows and doors have been radically altered. The removal of the fireplace and chimney from the south side to the west side of the living room also had a detrimental effect on the original Wallace Neff design of the house. As Dr. Kirk explains, the house has also lost materials, workmanship, and feeling – all of which are the most important aspects of integrity for residential properties associated with this era of the context. I concur with Dr. Kirk's findings that 3406 17-Mile Drive has lost its integrity

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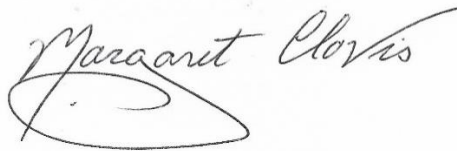
<sup>3</sup> The minimum eligibility requirements for residential properties from this era are listed on page 100 in the *Pebble Beach Historic Context Statement*.

and therefore is not eligible for the National Register of Historic Places, the California Register of Historic Resources, or the Monterey County Register of Historic Resources.

In summary, I agree with Dr. Kirk's conclusions that 3406 17-Mile Drive meets the eligibility criteria for Design/Construction under Criterion C (National Register, 3 (California Register), and A5 and B1-3 (Monterey County Register). However, the property does not retain integrity and therefore is not a historic resource as defined by the California Environmental Quality Act (CEQA).

Thank you for the opportunity to review Dr. Kirk's report. If you have any questions please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Margaret Clovis". The signature is written in black ink and is positioned above the printed name.

Margaret (Meg) Clovis

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