Attachment H

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KATHRYN SMITH
MODERN ARCHITECTURE HISTORY LTD.
521 WEST RUSTIC ROAD
SANTA MONICA, CA 90402
modarchistory@yahoo.com

June 5, 2023

Ms. Mary Israel
Salinas, California

Dear Mary Israel,

I am a historic preservation consultant and scholar concentrating on the buildings of Frank Lloyd Wright and his contemporaries, Richard J. Neutra and R.M. Schindler. I just published a book titled Frank Lloyd Wright's Walker House, Carmel. I have been working for the last 40 years and have considerable experience, especially with Wright, of houses that have been threatened with demolition or major alterations.

The Frank Lloyd Wright Building Conservancy is proud to declare that none of Wright's buildings have been demolished in the last 25 years and eight of them have been placed on the World Heritage List (UNESCO) joining the Pyramids of Giza and the Taj Mahal. These efforts protect the cultural patrimony of the United States.

I am aware that Richard Neutra's Connell House (1958), which is eligible for listing on the National Register of Historic Places and is on the California Register of Historical Resources (CRHR), is threatened with demolition. I am concerned and shocked because Neutra is not only universally regarded as one of the most important modern architects in the United States, but he also has international standing. He is the leading architect in the category of Mid-Century Modern, of which the Connell House is a prime example. His significance is known, literally around the world: Europe and Asia. His houses are so sought after by buyers that they command very high prices and then are subject to the highest levels of historic restoration, right down to doorknobs and window frames. Everyone who buys a Neutra house wants 100% pure Neutra.

I also am aware that the Connell House, at this moment, is still in a condition where all the character-defining traits are present. The materials, the massing, the volumes, the view, the setting; it is, however, being subject to planned "demolition by neglect" by the current owner. Monterey County is indeed fortunate that one of Neutra's buildings is part of its 20th century history. I urge you and the Board to protect your cultural patrimony. Once it is gone forever, it can never be replaced.

Yours sincerely,

Kathryn Smith

Anthony Kirk, Ph.D.
412 East Via Ensenada Circle
Palm Springs, CA 92264
831-818-2929

30 May 2023

Monterey County
Board of Supervisors
168 West Alisal Street
Salinas, CA 93901

Dear Chair Alejo and Board of Supervisors:

The Viennese architect Richard Neutra arrived in Los Angles in 1925 and established his reputation four years later with the completion of the Lovell house, a stunning expression of the International style, set high in the Hollywood Hills, and the first entirely steel-frame residence in the country. In the catalogue to the landmark 1932 "Modern Architecture" exhibition at the Museum of Modern Art in New York, he was hailed as "the leading modern architect of the West Coast." Although chiefly associated with southern California, Neutra began working in the San Francisco Bay Area as early as 1935, designing a clapboard house on Twin Peaks. In 1939 he received a commission from William and Alice Davey create a house at 522 Loma Alta Road in Carmel. It was sold in 1995 to Peterson Conway, whose remodeling and additions removed much of the architect's original design.

As such the Connell house is the sole example of his work in Monterey County. Within this context, the Connell house, located in Pebble Beach at 1170 Signal Hill Road is significant as an important and relatively early example of modern architecture in Pebble Beach by a leading American architect. Completed in 1958, the house draws more on the ideals of the International style than on the Bay Area Tradition, but the stark minimalism of the Bauhaus is softened by the complex massing, the use of wood, the broad expanses of glass, and the sensitivity with which it is set in the landscape. Strongly horizontal in form, lying long and low on the earth, open to light and nature, it exhibits the elements associated with Neutra's residential architecture, including post-and-beam construction, cantilevered roof slabs and projecting beams, ribbon windows and glass walls, and what his biographer Thomas Hines identified as the single most essential character of his work, "the interpenetration of inner and outer space."

The Connell house was acquired by Massy Mehdipour in 2004, when the house was forty-eight-years old. Neutra, as stated earlier, was hailed in 1932 as "the leading modern architect of the West Coast." According to *How to Apply the National Register Criteria for Evaluation*, National Register Bulletin 15, rev. ed. ([Washington, D.C.] (1995), 42, a property less than fifty years old that is of "exceptional importance" may be placed in the National Register of Historic Places, if it significant at the local, State, or national level. It is clear that the Connell house would have qualified as a significant resource in 2004,

and I would have nominated it for listing to the National Register because of its exceptional importance at the local level.

Sincerely yours,

Anthony Kirk, Ph.D.

RAYMOND RICHARD NEUTRA M.D. Dr. PH

President, Neutra Institute for Survival Through Design
www.neutra.org
651 Sinex Avenue
Pacific Grove, CA 93950
(510) 375 3451
raymondneutra@ gmail.com

May 17,2023

Mary Israel
Cc head of HRRB
Head of Planning Commission
Board of Supervisors

Dear Ms Israel

Earlier this year the HRRB and the Planning Commission voted to permit Ms. Mehdipour to demolish the 1958, Neutra-designed Connell House. Their stated reason for allowing the demolition of this historic house was that the deterioration had reached such a degree since 2014 that the product of any reconstruction would "not be historic." Both entities failed to back this assertions with:

a) What regulations pertain to retaining such a reconstructed house on the state's list of historic properties
b) Any research on what would be needed to reconstruct the house back to its 2014 condition (or beyond) or whether the repairs would indeed threaten its historicity.

The Association of Monterey Area Preservationists and the Neutra Institute for Survival Through Design has done some preliminary research on these points. With regards to regulations pertaining to listing, we received guidance from Mr. Jay Correia of the California Office of Preservation. He explained that a property stays on the state's list until someone asks the State Historical Resources Commission to remove it from the list. The Commission would then judge the application for removal according to the National Register Criteria Consideration E: Reconstructed Properties. This states that:

> A reconstructed property is eligible when it is accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan and when no other building or structure with the same association has survived, all three requirements must be met." These criteria pertain to a building reassembled from some historic and some new materials.

Mr. Correia went on to say "In practice, the Registration Unit would not support removal unless historic integrity is nearly nonexistent. If the basic volume of the building, the roof form, the location, the setting, the relationship with the landform all survives, this would argue that the building retains some historic integrity." Deterioration from neglectful stewardship would provide for further argument in favor of continued listing of a reconstructed building.

With regard to the nature of needed reconstruction of this building, whose structural integrity was attacked with chain saws in 2015, we consulted an architect who had visited and documented the destruction in 2020.

We conclude that a willing new owner of this building could indeed restore this building. It is likely that the cost of doing this would be less than the cost of demolishing the historic building, removing its extensive foundations and replacing it with a building with three times the square footage. We also conclude that the reconstruction could easily meet the National Registration Criteria E. Therefore any hypothetical party who would challenge its historicity before the State Historic Resources Commission would not prevail.

We hope this information will be helpful to you as you draft a resolution to formalize the unanimous decision of the Board of Supervisors to reverse the recommendations of the HRRB and the Planning Commission to demolish this historic house.

Standards for Reconstruction

1. Reconstruction will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture and such reconstruction is essential to the public understanding of the property.
2. Reconstruction of a landscape, building, structure or object in its historic location will be preceded by a thorough archeological investigation to identify and evaluate those features and artifacts which are essential to an accurate reconstruction. If such resources must be disturbed, mitigation measures will be undertaken.
3. Reconstruction will include measures to preserve any remaining historic materials, features, and spatial relationships.
4. Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color and texture.
5. A reconstruction will be clearly identified as a contemporary re-creation.
6. Designs that were never executed historically will not be constructed.

GUIDELINES FOR RECONSTRUCTING HISTORIC BUILDINGS

INTRODUCTION

Reconstruction is different from the other treatments in that it is undertaken when there are often no visible historic materials extant or only a foundation remains. Whereas the treatment Restoration provides guidance on restoring historic building features, the **Standards for Reconstruction and Guidelines for Reconstructing Historic Buildings** should be followed when it is necessary to recreate a non-surviving building using new material. But, like restoration, reconstruction also involves recreating a historic building which appears as it did at a particular—and at its most significant—time in its history. Because of the potential for historical error in the absence of sound physical evidence, this treatment can be justified only rarely and, thus, is the least frequently undertaken of the four treatments. Reconstructing a historic building should only be considered when there is accurate documentation on which to base it. When only the appearance of the exterior of the building can be documented, it may be appropriate to reconstruct the exterior while designing a very simple, plain interior that does not attempt to appear historic or historically accurate. Signage and interpretative aids should make it clear to visitors that only the exterior of the building is a true reconstruction. Extant historic surface and subsurface materials should also be preserved. Finally, the reconstructed building must be clearly identified as a contemporary recreation.

Research and Document Historical Significance

The guidance for the treatment **Reconstruction** begins with *researching and documenting* the building's historical significance to determine whether its recreation is essential to the public understanding of the property. In some instances, reconstruction may not be necessary if there is a historic building still existing on the site or in a setting that can explain the history of the property. Justifying a reconstruction requires detailed physical and documentary evidence to minimize or eliminate conjecture and to ensure that the reconstruction is as accurate as possible. Only one period of significance is generally identified; a building—as it evolved—is rarely recreated. If research does not provide adequate documentation for an accurate reconstruction, other interpretive methods should be considered, such as an explanatory marker.

Investigate Archeological Resources

Investigating archeological resources is the next area of guidance in the treatment **Reconstruction.** The purpose of archeological research is to identify any remaining features of the building, site, and setting that are essential to an accurate recreation and must be reconstructed. Archeological resources that are not essential to the reconstruction should be left in place. The archeological findings, together with archival documentation, should be used to replicate the design, materials, and plan of the historic building.

Identify, Protect, and Preserve Extant Historic Features

Closely aligned with archeological research, recommendations are given for ***identifying, protecting, and preserving*** extant features of the historic building. It is never appropriate to base a **Reconstruction** upon conjectural designs or on features from other buildings. Any remaining historic materials and features should be retained and incorporated into the reconstruction when feasible. Both the historic and new materials should be documented to assist in interpretation.

Reconstruct Non-Surviving Building and Site

After the research and documentation phases, guidance is given for **Reconstruction** work itself. Exterior and interior features are addressed in general, always emphasizing the need for an accurate depiction (i.e., careful duplication of the appearance of historic materials and features for interpretative purposes). While the use of traditional materials and finishes is always preferred, in some instances substitute materials may be used if they are able to convey the same appearance. Where non-visible features of the building are concerned, such as interior structural systems, contemporary materials and technology may be used. Recreating the features of the building site or setting based on archeological findings should also be an integral part of project work.

Accessibility and Life Safety, Natural Hazards, and Sustainability

Whereas preservation, rehabilitation, and restoration treatments usually necessitate retrofitting to meet code requirements and to address other issues (including natural hazards and sustainability), in this treatment it is assumed that the **Reconstructed** building will be essentially new construction. Thus, code-required work, treatments to reduce the potential impact of natural hazards, and ensuring that the reconstructed building is as sustainable as possible should be considered during the design phase—when appropriate to the particular Reconstruction project—so as not to negatively impact or detract from the reconstructed appearance of the building, its site, and setting. The fact that the non-surviving building was located in a floodplain or another area especially vulnerable to the impact of natural hazards is crucial to consider when determining whether the building should be reconstructed.

The topic of sustainability is addressed in detail in *The Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings*. Although specifically developed for the treatment Rehabilitation, the Guidelines can be used to help guide the other treatments.

Reconstruction as a Treatment. *When a contemporary depiction is required to understand and interpret a property's historic value (including the re-creation of missing components in a historic district or site); when no other property with the same associative value has survived; and when sufficient historical documentation exists to ensure an accurate reproduction,* ***Reconstruction*** *may be considered as a treatment. Prior to undertaking work, a documentation plan for Reconstruction should be developed.*

OVERVIEW

RECOMMENDED	NOT RECOMMENDED
Researching and documenting the property's historical significance, focusing on documentary and physical evidence which is needed to justify reconstruction of the non-surviving building.	Undertaking a reconstruction based on insufficient research so that, as a result, a historically inaccurate building is created. Reconstructing a building unnecessarily when an existing building adequately reflects or explains the history of the property, the historical event, or has the same associative value. Executing a design for a building that was never constructed.
Investigating archeological resources to identify and evaluate those features and artifacts which are essential to the design and plan of the building.	Failing to identify and evaluate archeological material prior to reconstruction, or destroying extant historic material not relevant to the reconstruction but which should be preserved in place.
Minimizing disturbance of the terrain around buildings or elsewhere on the site, thereby reducing the possibility of destroying or damaging important landscape features, archeological resources, other cultural or religious features, or burial grounds.	Using heavy machinery or equipment in areas where it may disturb or damage important landscape features, archeological resources, cultural or religious features, or burial grounds.
Identifying, retaining, and preserving extant historic features of the building, site, and setting, such as remnants of a foundation, chimney, or walkway.	Beginning reconstruction work without first conducting a detailed site investigation to physically substantiate the documentary evidence. Basing a reconstruction on conjectural designs or on features from other historic buildings.

[3] The Cathedral of Saint Michael the Archangel, built in the early 1840s in Sitka, AK, was devastated by fire in 1966. It was reconstructed using measured drawings done in 1961 by the Historic American Buildings Survey (HABS). While the original cathedral was built of logs covered on the exterior with wood siding, its replacement is a fire-resistant structure with concrete and steel walls that replicates the historic building's appearance. *Photo: Barek at Wikimedia Commons.*

BUILDING EXTERIOR

RECOMMENDED	NOT RECOMMENDED
Reconstructing a non-surviving building to depict the documented historic appearance. Although the use of the original building materials (such as masonry, wood, and architectural metals) is preferable, substitute materials may be used as long as they recreate the historic appearance.	Reconstructing features that cannot be documented historically or for which existing documentation is inadequate. Using substitute materials that do not convey the appearance of the historic building.
Recreating the documented design of exterior features, such as the roof form and its coverings, architectural detailing, windows, entrances and porches, steps and doors, and their historic spatial relationships and proportions.	Omitting a documented exterior feature, or rebuilding a feature but altering its historic design. Using inappropriate designs or materials that do not convey the historic appearance.
Reproducing the appearance of historic paint colors and finishes based on documentary and physical evidence.	Using paint colors that cannot be documented through research and investigation or using other undocumented finishes.
Installing exterior electrical and telephone cables underground or in the least obtrusive location possible, unless they can be documented as having been aboveground historically.	Attaching exterior electrical and telephone cables to the principal elevations of the reconstructed building, unless they can be documented as having been there historically.
Using signage to identify the building as a contemporary recreation.	Failing to explain that the building is a reconstruction, thereby confusing the public's understanding of the property.

BUILDING INTERIOR

RECOMMENDED	NOT RECOMMENDED
Recreating the appearance of *visible* features of the historic structural system, such as posts and beams, trusses, summer beams, vigas, cast-iron columns, above-grade masonry foundations, or load-bearing brick or stone walls. Contemporary methods and materials may be used for the actual structural system of the reconstructed building.	Changing the documented appearance of visible features of the structural system.
Recreating the historic floor plan and interior spaces, including the size, configuration, proportion, and relationship of rooms and corridors; the relationship of features to spaces; and the spaces themselves.	Altering the documented historic floor plan, or relocating an important interior feature, such as a staircase, so that the historic relationship between the feature and the space is inaccurately depicted. Reconstructing the historic appearance of the interior without accurate documentation.
Duplicating the documented historic appearance of the building's interior features and finishes (including columns, cornices, baseboards, fireplaces and mantels, paneling, light fixtures, hardware, and flooring); plaster, paint, and finishes (such as stenciling or marbleizing); and other decorative or utilitarian materials and features.	Altering the documented appearance of the building's interior features and finishes so that, as a result, an inaccurate depiction of the historic building is created. For example, moving a feature from one area of a room to another, or changing the type or color of the finish.
Installing mechanical systems and their components in the least obtrusive way possible so as not to impact the recreated interior spaces, features, or finishes while meeting user needs.	Altering the historic plan or the recreated appearance unnecessarily when installing mechanical systems.
Installing ducts, pipes, and cables in closets, service areas, and wall cavities.	Installing ducts, pipes, and cables where they will intrude upon the historic appearance of the building.

BUILDING SITE

RECOMMENDED	NOT RECOMMENDED
Reconstructing building site features based on documentary and physical evidence.	Reconstructing building site features without documentary and physical evidence.
Inventorying the building site to determine the existence of aboveground remains and subsurface archeological resources, other cultural or religious features, or burial grounds, and using this evidence as corroborating documentation for the reconstruction of related site features. These may include walls, fences, or steps; circulation systems, such as walks, paths, or roads; vegetation, such as trees, shrubs, grass, orchards, hedges, windbreaks, or gardens; landforms, such as hills, terracing, or berms; furnishings and fixtures, such as light posts or benches; decorative elements, such as sculpture, statuary, or monuments; water features, including fountains, streams, pools, lakes, or irrigation ditches.	Giving the building's site an inaccurate appearance by basing the reconstruction on conjectural designs or on features from other sites.
Recreating the historic spatial relationship between buildings and related site features.	Changing the historic spatial relationship between buildings and related site features, or reconstructing some site features but not others, thereby confusing the depiction of the reconstructed site.

SETTING (DISTRICT / NEIGHBORHOOD)

RECOMMENDED	NOT RECOMMENDED
Reconstructing features in the building's historic setting based on documentary and physical evidence.	Reconstructing features in the setting without documentary and physical evidence.
Inventorying the setting to determine the existence of above-ground remains and subsurface archeological resources, other cultural or religious features, or burial grounds, and using this evidence as corroborating documentation for the reconstruction of missing features of the historic setting. These may include circulation systems, such as roads and streets; furnishings and fixtures, such as light posts or benches; vegetation, gardens, and yards; adjacent open space, such as fields, parks, commons, or woodlands; and important views or visual relationships.	Giving the building's setting an inaccurate appearance by basing the reconstruction on conjectural designs or on features from other locations.
Recreating the historic spatial relationship between buildings and landscape features in the setting.	Changing the historic spatial relationship between buildings and landscape features in the setting by reconstructing some features but not others, thereby confusing the depiction of the reconstructed setting.

[7] The Muhlenberg Brigade Huts are reconstructions of nine log huts erected in 1777 at Valley Forge during the Revolutionary War. They have been reconstructed on the historic road with logs cut with modern power tools and finished with cement, unlike the original logs which were hand hewn and finished with traditional chinking. *Photo: Rdsmith4 at Wikimedia Commons.*

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