PRELIMINARY ARCHAEOLOGICAL RECONNAISSANCE FOR
ASSSESSOR'S PARCELS 015-021-015, 015-021-020, AND 015-021-021,
in Carmel, Monterey County, California

by

Mary Doane, B.A., and Gary S. Breschini, Ph.D., RPA

June 26, 2007

Prepared for
Carmel Rio Road, LLC

SUMMARY: PROJECT 4041
RESULTS: NEGATIVE
ACRES: ±8.0
SITES: NONE
UTMG: NE 5.9838/40.4428, SE 5.9838/40.4412, SW 5.9822/40.4412, NW 5.9822/40.4428
MAP: USGS 7.5 MINUTE MONTEREY QUADRANGLE
INTRODUCTION

In June 2007 Archaeological Consulting was authorized by Brian Clark of Carmel Rio Road, LLC to prepare a Preliminary Archaeological Reconnaissance report for a proposed subdivision of three existing parcels in Carmel, Monterey County, California.

As part of our methodology in the preparation of this report, we have conducted: 1) a previous background records search at the Northwest Regional Information Center of the California Historical Resources Information System, located at Sonoma State University, Rohnert Park; and 2) a field reconnaissance of the project area. The following report contains the results of these investigations as well as our conclusions and recommendations.

PROJECT LOCATION AND DESCRIPTION

The project area is located at 25600 Val Verde in Carmel, Monterey County, California (see Maps 1 and 2). The Assessor's Parcel Numbers are 015-021-015, 015-021-020 and 015-021-021. The Universal Transverse Mercator Grid (UTMG) coordinates for the approximate corners of the eight acre project area are as follows: NE 5.9838/40.4428, SE 5.9838/40.4412, SW 5.9822/40.4412, and NW 5.9822/40.4428 on the USGS 7.5 minute Monterey Quadrangle (1947; photorevised 1983). The project proposes a subdivision which would result in thirty one market rate homes and eleven inclusionary units.

At the time of the reconnaissance most of the project area was fallow agricultural land which was vegetated in weeds and volunteer vegetables. A portion of parcel 021 had been covered with imported fill which contained some abalone shell fragments. Parcel 020 contained a house, a small shed, lawns and garden plantings. The southern part of parcel 020 was densely vegetated with brush. Surface soil visibility was fair to good through most of the project area. Overall, soil visibility was considered adequate for the purposes of the reconnaissance.
PROJECT METHODOLOGY

The methodology used in the preparation of this report included two primary steps, as follows:

Background Research

The background research for this project included an examination of the archaeological site records, maps, and project files of the Northwest Regional Information Center of the California Historical Resources Information System, located at Sonoma State University, Rohnert Park, California. In addition, our extensive personal files and maps were examined for supplemental information, such as rumors of historic or prehistoric resources in the general project area.

The Regional Information Centers have been established by the California Office of Historic Preservation as the local repository for all archaeological reports which are prepared under cultural resource management regulations. The background literature search at the appropriate Regional Information Center is required by state guidelines and current professional standards. Following completion of the project, a copy of the report must be deposited with that organization.

These literature searches are undertaken to determine if there are any previously recorded archaeological resources within the project area, and whether the area has been included in any previous archaeological research or reconnaissance projects.

Field Reconnaissance

The field reconnaissance was conducted by Mary Doane, B.A., and Patrick Cave on June 22, 2007. The survey consisted of a “general surface reconnaissance” of all project areas which could reasonably be expected to contain visible cultural resources, and which could be viewed without major vegetation removal or excavation.
RESULTS OF THE RECONNAISSANCE

Background Research

The record search of the files at the Northwest Regional Information Center found that there are two recorded cultural resources located within one kilometer of the project parcels. The nearer site is 300 meters (±1,000 feet) to the northwest. The project area appears to have been at least partially included in a previous study (Runnings and Breschini 1988).

In addition, the California Inventory of Historical Resources (March 1976), California Historical Landmarks, and the National Register of Historic Places were checked for listed cultural resources which might be present in the project area; none were discovered.

The project area lies within the currently recognized ethnographic territory of the Costanoan (often called Ohlone) linguistic group. Discussions of this group and their territorial boundaries can be found in Breschini, Haversat, and Hampson (1983), Kroeber (1925), Levy (1978), Margolin (1978), and other sources. In brief, the group followed a general hunting and gathering subsistence pattern with partial dependence on the natural acorn crop. Habitation is considered to have been semi-sedentary and occupation sites can be expected most often at the confluence of streams, other areas of similar topography along streams, or in the vicinity of springs. These original sources of water may no longer be present or adequate. Also, resource gathering and processing areas, and associated temporary campsites, are frequently found on the coast and in other locations containing resources utilized by the group. Factors which influence the location of these sites include the presence of suitable exposures of rock for bedrock mortars or other milling activities, ecotones, the presence of specific resources (oak groves, marshes, quarries, game trails, trade routes, etc.), proximity to water, and the availability of shelter. Temporary camps or other activity areas can also be found along ridges or other travel corridors.
Field Research

The visible surface soil in the project area was a tan to light gray sandy silt. None of the materials frequently associated with prehistoric cultural resources in this area (dark midden soil, eroded marine shell fragments, fire-affected rock, flaked or ground stone, weathered bone fragments, formal artifacts, etc.) were observed during the reconnaissance in the native soil. The imported fill on parcel 021 and the southern part of parcel 015 contained abalone shell fragments.

No potentially significant historic period archaeological materials were seen in the project area.

CONCLUSIONS AND RECOMMENDATIONS

Based upon the background research and the surface reconnaissance, we have concluded that the project area does not contain surface evidence of potentially significant archaeological resources. Because of this, we make the following recommendation:

- The proposed subdivision development should not be delayed for archaeological reasons.

Because of the possibility of unidentified (e.g., buried) cultural resources being found during any construction, we recommend that the following standard language, or the equivalent, be included in any permits issued within the project area:

- If archaeological resources or human remains are accidentally discovered during construction, work shall be halted within 50 meters (150 feet) of the find until it can be evaluated by a qualified professional archaeologist. If the find is determined to be significant, appropriate mitigation measures shall be formulated and implemented.
REFERENCES

Breschini, G. S., T. Haversat, and R. P. Hampson
1983 A Cultural Resources Overview of the Coast and Coast-Valley Study Areas [California]. Coyote Press, Salinas.

Kroeber, A. L.

Levy, R.

Margolin, M.

Runnings, A. and G. S. Breschini
1988 Preliminary Cultural Resources Reconnaissance of a Proposed Development on Via Verde Way, Carmel Valley, Monterey County, California. On file with the Northwest Information Center, Sonoma State University.
Brian Clark  
430 Ortiz Ave., Suite B  
Sand City, CA 93955  
Via email: brian@surfloan.com  

Brian:

I am writing, as you requested, concerning a report we did for you in 2007. You indicate that the County wants an update.

In 2007, in our Project 4041, we examined three parcels: APNs 015-021-015, -020, and -021, in Carmel, Monterey County, California. We concluded at that time that there were no potentially significant archaeological resources within those parcels.

Since our previous survey found no evidence of archaeological resources on the parcel, and survey standards have not changed in the intervening years, we see no need for an additional Archaeological Reconnaissance.

Let me know if you need anything additional on this.

Sincerely,

Gary S. Breschini  
Gary S. Breschini, Ph.D.
April 8, 2010

Mr. Brian Clark
430 Ortiz, Unit B
Sand City, CA 93955

Dear Mr. Clark:

Thank you for the opportunity to prepare a Phase I Historic Review of the residential property at 26500 Val Verde Rd. (APN# 015-021-020) near Carmel in Monterey County, as required by the California Environmental Quality Act (CEQA) and the County of Monterey.

Monterey County Assessor's records estimate the subject property as being constructed in 1958. The Assessor's record the wood-framed garage NW of the subject property as being constructed in 1962 (MCBP# 3194), and therefore not a part of this review.

Monterey County Deeds show the original owner of the residence was William Gamboa. Gamboa was a housing developer in the late 1950s who subsequently moved to the Madera area in the central valley. No builder has been identified. Mr. Gamboa purchased the parcel in 1950 from previous owner Howard Hatton. The land was part of the old Win. Hatton dairy farm that once occupied the site of the Carmel Barnyard shopping center. The property was purchased by the current owner, Mr. Roy Wirra, in 2007.

The subject property is a one-story, wood-framed example of the California Ranch House style of architecture. It is irregular in plan, and rests on a concrete foundation. The exterior wall cladding is a combination of combed wood shingles, with a brick veneer along the entryway.

The roof system is an intersecting hip and gable type with a central hipped roof having a gabled living room wing projecting toward the south, and a hip-roofed two-car garage wing projecting toward the east. The overhanging eaves have closed soffits. The roof on the south side of the main building block projects over the principal entry, forming an open porch supported by large, square wood posts.
The flush board entry door is located on the south side of the main building block where it meets the east side of the living room wing. On the rear (west) elevation, the main building block projects slightly allowing for a covered rear entry where the living room wing meets this feature. There is one brick exterior eave wall chimney present. It is located about midway along the west elevation of the living room wing. All roof covering is in composition shingles.

Fenestration is irregular, with a combination of large fixed and banked bay windows on the south end of the living room wing, and two-part fixed and casement type industrial steel windows on all other elevations. The nonhistoric 1962 wood-framed, gable-roofed garage is found just NW of the residence.

The residence is sited back from the street on a well wooded parcel on the west side of Val Verde Drive. It is located in a wooded rural residential neighborhood of condominium complexes, single family dwellings and open farmland adjacent to the Carmel Barnyard shopping center at the mouth of Carmel Valley.

The California Environmental Quality Act (CEQA), PRC Sec. 21084.1 requires all properties fifty years of age or older to be reviewed for potential historic significance. Criteria for that significance is addressed in PRC Sec. 5024.1(a). It asks, generally, did any event of importance to the region, state or nation occur on the property? Did anyone of great importance to the region, state or nation occupy the property during the productive period of their lives? Does the building represent an important architectural type, period or method of construction, or is it a good example of the work of a noted architect or master-builder? The criteria also asks if the property is likely to yield information significant to the understanding of the area's history.

The subject property is an example the California Ranch House style, which was one of the most popular and widely constructed residential designs of the pre and post WWII era, especially in mass subdivision housing. The style was derived from Early Californian and American vernacular sources, minimizing decorative detailing. They are characterized by their low, horizontal profiles, use of native materials, and informal open planning that included porches and patios affording easy access from the inside to the outside. California Ranch House style residences still abound in the residential communities Monterey County.
Eligibility for listing buildings, structures, objects, sites, and districts (i.e., resources) in the National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) rests on two factors of historic significance and integrity. A resource must have both significance and integrity to be considered eligible. Loss of integrity, if sufficiently great, will overwhelm the historic significance a resource may possess and render it ineligible. Likewise, a resource can have complete integrity, but if it lacks significance, it must also be considered ineligible.

**Integrity** is determined through applying seven factors to the historic resource: location, design, setting, workmanship, materials, feeling and association. These seven can be roughly grouped into three types of integrity considerations. Location and setting relate to the relationship between the property and its environment. Design, materials, and workmanship, as they apply to historic buildings, relate to construction methods and architectural details. Feeling and association are the least objective of the seven criteria and pertain to the overall ability of the property to convey a sense of historical time and place in which it was constructed.

The subject property is in its original location, however its former rural setting has been compromised by the construction of the Carmel Barnyard shopping center to the immediate west, and a large condominium complex just south of the residence. While the house retains its original design and materials, it is one of hundreds of the same style and type found in Monterey County. The workmanship is consistent with the production of subdivision housing in the postwar era. Because of the density of the adjacent development, the subject property evokes little sense of time and place or of feeling and association with the former rural nature of its setting.

No event of significance to the nation, state or region, nor any important individual has been identified with the existing property. William Gamboa, the original owner, soon left the area. No architect or builder has been identified with the design of the residence.

The subject property is one of many California Ranch House style residences constructed in Monterey County and the Carmel Valley in the post WW II era. It retains its physical integrity as constructed in 1958, however, it lacks sufficient architectural distinction or historic significance to be considered eligible for listing in the California Register or qualifying for listing on the Monterey County Historic Resource inventory. Therefore, the structure cannot be considered an historic resource as defined by CEQA.

Respectfully Submitted,

[Signature]
Photo #1. Looking NW at the south facing facade.
Note attached garage to right. April. 2010.

Photo #2. Looking west at the east side-elev. of the living room wing. April. 2010.
Appendix E-4
Addendum to the Phase I Historic Review
June 24, 2016

Mr. Bob Schubert-Senior Planner
Monterey County Resource Management Agency
Planning Department
168 W. Alisal St., 2nd Floor
Salinas, CA 93901

Dear Mr. Schubert:

This letter will act as an Addendum to my Phase I Historic Review of the 1958 residential property located at 26500 Val Verde Rd. (APN# 015-021-020) near Carmel in Monterey County. The Addendum is in response to a five year review of the original historic study dated April 8, 2010 (see copy provided). Rincon Consultants, Inc., of Monterey requested some clarification on the site setting and characteristics.

The subject property is sited on the west side of Val Verde Rd. on a wooded parcel that is part of the subdivision of Lot 14, Hatton Partition of the Rancho Canada De La Segunda, originally surveyed in 1927, and further modified in July, 1950, and again reduced into into four smaller parcels April, 1956 (see plat maps provided). Zoning is (LDR/1-D-S-RAZ), Low Density Residential, (PLN#1400890).

The original 1880's Hatton Dairy complex, located west of the subject property at the mouth of Carmel Valley, including all its outbuildings were demolished for a shopping center in the late 1970s, ironically called The Barnyard. The earlier land use for the parcel under review was dairy grazing. The parcel immediately to the north of the subject property is currently in use as an organic garden, but has only been under cultivation since the 1980s.

In 2011 Past Consultants of Alameda, California prepared an Agricultural Resources Evaluation Handbook for Monterey County. The document specifically covered North Monterey County and the Salinas Valley, but not Carmel Valley. However, its themes address the types of agricultural development that occurred over time in the entire county. Under its Theme 2: Intensive Agriculture (ca. 1870-1960) it created property type descriptions including a Dairy Sub-type. Under its description of Physical Characteristics it called for “a primary residence oriented towards a primary transportation route, outbuildings including dairy barns, milk houses, cheese processing houses, tank houses, equipment barns and worker's housing”. Eligibility for historic listing requires integrity, the ability of a property to convey its significance.
The Monterey County Agricultural Resource Evaluation Handbook employs the seven aspects of Integrity adopted by the National Register of Historic Places to determine integrity thresholds for its contextual themes. Under the aspect of Location, *the place where significant activities that shaped a property took place*, Intensive Farmsteads are generally located on moderate tracts of open land, near a road or rail transportation link.

The subject property, a single family residential parcel is the result of three periods of subdivision of the Hatton Dairy Farm, from 1927 to 1956 (see plat maps provided). It is just to the east of a major shopping complex that replaced all of the extant buildings of the dairy operation in the late 1970s. Small open fields exist to its north and east, but are rapidly filling up with new housing units. 26500 Val Verde Rd. lacks integrity of location.

Under the aspect of Setting, *the physical environment within and surrounding a property, including large and small scale features in which historic events took place*, would require the main house and dairy outbuildings, aspects of its natural environment and some fencing to be as intact as possible. 26500 Val Verde Rd. lacks integrity of setting.

Under the aspects of design, Materials and Workmanship, *the composition of natural and cultural elements, comprising the form and spatial organization of a property should be intact to communicate the property's historic use*, as a dairy farm. As noted above, nothing of the Hatton Dairy Farm remains. This is also true of the aspects of Materials and Workmanship, *including period construction techniques, or any vegetation similar to historic species in type, scale and visual effect that might convey historic integrity*. 26500 Val Verde Rd. lacks integrity of design, Materials and Workmanship that would connect it with the intensive farming of the former Hatton Dairy Farm.

Under the aspects of Feeling, *any evocation by the presence of physical characteristics that reflect the historic scene through the cumulative effect of setting, Design, Materials and Workmanship creates the sense of past time and place*. Association, *is the direct link between a property and the important events or persons who shaped it*. An intensive farmstead with integrity of Feeling and Association should reflect the historic persons, land use and historic events that shaped the Hatton Dairy Farm as an intensive farmstead. 26500 Val Verde Rd. lacks the integrity of Feeling and Association that would connect it with the intensive farming of the former Hatton Dairy Farm.

As there is no formal historic context statement for Carmel Valley, the existing 2013 Pebble Beach Historic Context Statement, prepared by Page & Turnbull, Inc., of San Francisco was consulted for significance criteria related to residential properties constructed in the post-WWII era, up to 1965.

The context statement includes Monterey County Review criteria, which states, in part, *"Suburban Ranch style buildings are very common in Pebble Beach and California as a whole."*
Thus, architectural significance is best reserved for buildings that demonstrate particularly strong artistic merit, or that clearly demonstrate the influence of a particular architect or builder.” The residence at 26500 Val Verde Rd. does neither of these things.

The original 1958 attached garage at 26500 Val Verde Rd., is located off the NE front elevation of the residence. The detached, 1962 one-story garage/storage unit, located a little NW of the rear of the residence, is front-gabled with paired sliding barn doors, and rests on a mud-sill foundation. The exterior wall cladding is a narrow vertical flush wood siding. It's low-pitched roof slightly overhangs the eave line and is covered in composition shingles. There are two window openings, along the south side-elevation. Its design is unrelated to that of the main house, and in current use as storage. Both the single family residence and its detached garage/storage unit, which also lacks any architectural distinction, are unrelated to agricultural use (see photos provided). There are no additional ancillary structures present.

The Rincon Consultants, Inc. October 14, 2015 Peer Review of the Architectural History Evaluation of the subject property noted that “a letter report format is suitable for projects with minimal potential to impact historical resources”. They also stated that “Rincon did not find any specific evidence that would reverse the conclusions outlined the cultural resources studies prepared for this project”, but suggested strengthening the report to insure the study is in conformance with CEQA and the Monterey County guidelines for cultural resources. This addendum covers the questions asked by the peer reviewers. The conclusions reached in the original review remain valid (see copy provided).

Respectfully Submitted,

[Signature]

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Sources

City of Carmel-by-the-Sea
Harrison Memorial Library, History Annex biographical and historical files.

City of Monterey
Monterey Public Library, California History Room biographical and history files.

County of Monterey
Assessor's records, Monterey County Assessor's office, Salinas, CA.

Recorder's records, Monterey County Recorder's office, Salinas, CA.

2011 Agricultural Resources Evaluation Handbook, Monterey County California,

2013 Pebble Beach Historic Context Statement, Page & Turnbull, Inc.: San Francisco,
CA, pp. 116-122.

Clark, Donald
1991 Monterey County Place Names A Geographical Dictionary, Kestrel Press:

DeVoe, Marcia
1979 The Martins and The Hattons, Marcia DeVoe: Carmel Valley.

Fink, Augusta

National Park Service
1995 National Register Bulletin, How to Apply the National Register Criteria for

Seavey, Kent,
2008 Phase I Historic Review, 6540 Carmel Valley Road, Hatton Dairy Barn (Upper
Hatton Ranch), Carmel Valley, Monterey County, California.
Photo #1. Looking NW at the detached 1962 garage/storage unit, June, 2016.
April 8, 2010

Mr. Brian Clark
430 Ortiz, Unit B
Sand City, CA 93955

Dear Mr. Clark:

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The subject property is a one-story, wood-framed example of the California Ranch House style of architecture. It is irregular in plan, and rests on a concrete foundation. The exterior wall cladding is a combination of combed wood shingles, with a brick veneer along the entryway.

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The residence is sited back from the street on a well wooded parcel on the west side of Val Verde Drive. It is located in a wooded rural residential neighborhood of condominium complexes, single family dwellings and open farmland adjacent to the Carmel Barnyard shopping center at the mouth of Carmel Valley.

The California Environmental Quality Act (CEQA), PRC Sec. 21084.1 requires all properties fifty years of age or older to be reviewed for potential historic significance. Criteria for that significance is addressed in PRC Sec. 5024.1(a). It asks, generally, did any event of importance to the region, state or nation occur on the property? Did anyone of great importance to the region, state or nation occupy the property during the productive period of their lives? Does the building represent an important architectural type, period or method of construction, or is it a good example of the work of a noted architect or master-builder? The criteria also asks if the property is likely to yield information significant to the understanding of the area's history.

The subject property is an example the California Ranch House style, which was one of the most popular and widely constructed residential designs of the pre and post WWII era, especially in mass subdivision housing. The style was derived from Early Californian and American vernacular sources, minimizing decorative detailing. They are characterized by their low, horizontal profiles, use of native materials, and informal open planning that included porches and patios affording easy access from the inside to the outside. California Ranch House style residences still abound in the residential communities Monterey County.
Eligibility for listing buildings, structures, objects, sites, and districts (i.e., resources) in the National register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) rests on twin factors of historic significance and integrity. A resource must have both significance and integrity to be considered eligible. Loss of integrity, if sufficiently great, will overwhelm the historic significance a resource may possess and render it ineligible. Likewise, a resource can have complete integrity, but if it lacks significance, it must also be considered ineligible.

**Integrity** is determined through applying seven factors to the historic resource: location, design, setting, workmanship, materials, feeling and association. These seven can be roughly grouped into three types of integrity considerations. Location and setting relate to the relationship between the property and its environment. Design, materials, and workmanship, as they apply to historic buildings, relate to construction methods and architectural details. Feeling and association are the least objective of the seven criteria and pertain to the overall ability of the property to convey a sense of historical time and place in which it was constructed.

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No event of significance to the nation, state or region, nor any important individual has been identified with the existing property. William Gamboa, the original owner, soon left the area. No architect or builder has been identified with the design of the residence.

The subject property is one of many California Ranch House style residences constructed in Monterey County and the Carmel Valley in the post WWII era. It retains its physical integrity as constructed in 1958, however, it lacks sufficient architectural distinction or historic significance to be considered eligible for listing in the California Register or qualifying for listing on the Monterey County Historic Resource inventory. Therefore, the structure cannot be considered an historic resource as defined by CEQA.

Respectfully Submitted,

[Signature]

[Name]
Photo #1. Looking NW at the south facing facade. Note attached garage to right. April. 2010.

Photo #2. Looking west at the east side-elev. of the living room wing. April. 2010.
October 14, 2015
Rincon Project No. 14-00187

Bob Schubert, Senior Planner
Monterey County Resources Management Agency
Planning Department
168 W. Alisal St., 2nd Floor
Salinas, California 93901

Subject: Peer Review of an Archaeological Technical Report and Architectural History Evaluation for the Carmel Rio Road Subdivision Project, Unincorporated Monterey County, California

Dear Mr. Schubert:

This letter summarizes the results of a peer review of two cultural resource documents prepared for the property located at 15 and 26500 Val Verde Drive, within the Carmel Valley Master Plan Area, in unincorporated Monterey County, California. The project site lies approximately 0.7 mile southeast of the City of Carmel-by-the-Sea (outside of the City’s sphere of influence), approximately 0.3 mile east of Highway 1, and approximately 0.2 mile south of Carmel Valley Road (subject property). The project site is composed of three parcels (Assessor’s Parcel Numbers [APN] 015-021-015, 015-021-020, 015-021-021, & 015-021-015-000).

This peer review was conducted as part of the environmental analysis being conducted in conformance with the California Environmental Quality Act (CEQA) by the County of Monterey. The purpose of the review is to determine whether the cultural resources analyses completed for the project site are adequate for the purposes of preparing an Environmental Impact Report (EIR). This letter summarizes the results of a peer review of the following two cultural resources reports prepared for the subject property:

- **Phase I Historic Review, 26500 Val Verde Road, Carmel, Monterey County, California.** Prepared by Ken Seavey (Seavey 2010).

The peer review was conducted by Cultural Resources Principal Investigator Christopher Duran, M.A., RPA, who meets the Secretary of the Interior’s Professional Qualification Standards (PQS) for historic and prehistoric archaeology (National Park Service 1983), and Senior Architectural Historian Shannon Carmack, B.A. who meets the PQS for architectural history and history.
Methods
The analysis entailed review of the both cultural resources documents with regard to methods, findings, and the potential for the project to impact significant historical and or archaeological resources as defined in CEQA and the State CEQA Guidelines. No site visits were conducted by Rincon cultural resources staff; nor was any supplemental archival research, Native American or historical group coordination or California Historical Resources Inventory records search conducted.

Archaeological Report Peer Review

Doane and Breschini’s (2007) Preliminary Archaeological Reconnaissance for Assessor’s Parcels 015-021-015, 015-032-020, and 015-021-021 in Carmel, Monterey County, California follows a negative letter report format with the results of the records search, methodology, findings, and management recommendations. The letter report format does not include a prehistoric or historic context. This format is common for negative Phase I surveys in many areas; however, reports prepared following the Office of Historic Preservation’s (OHP; 1990) Archaeological Resource Management Reports (ARMR): Recommended Contents and Format typically provide more detail.

The methodology for the field investigation does not provide specific details for the field survey. The report states that the areas “reasonably expected to contain visible cultural resources” were inspected as part of the reconnaissance. The document does not indicate what or where these inspected areas are specifically within the project site. Although much of the site consists of agricultural fields, this does not preclude the area from containing cultural resources. The report also does not indicate if the inspected areas were surveyed using transects which may help to clarify the intensity of the field survey. The report also indicates that a portion parcel 021 is covered with fill material, but fails to indicate what percentage of the parcel consists of fill or how it was determined that the soils consist of fill. This information would also help indicate which areas were inspected during the field investigation.

Doane and Breschini also state that two cultural resources were noted in the research area (1 km) surrounding the project site, but did not identify what types of resources those might be. One resource was noted to be within 300 meters of the project site. This information may assist with determining the archaeological sensitivity of the area. For example, should those resources be prehistoric village sites, the archaeological sensitivity of the area would be greatly increased.

The Doane and Breschini study is approximately eight years old (completed in 2007). Areas are often resurveyed every 5 years as surface conditions change over time and may expose new resources. However, considering that the majority of the project consists of agricultural fields, an argument can be made that the field conditions would have had minimal changes over the eight-year period.

Recommended Changes

To bolster the argument of no impact to archaeological resources, Rincon recommends the following actions to further provide clarity and certainty in this finding:

- Indicate which areas of the project site were inventoried on a map and in the text, as well as which areas and percentage of the project site is covered by fill material.
• Add more details concerning the field methods (e.g., were those areas inspected for cultural resources surveyed using transects?). What was the transect spacing?
• Provide photos of the existing condition of the site.
• List the properties identified during the records search.
• Provide recommendations of archaeological sensitivity based on type and location of nearby resources.

Based on the information provided in *Preliminary Archaeological Reconnaissance for Assessor’s Parcels 015-021-015, 015-032-020, and 015-021-021 in Carmel, Monterey County, California* (Doane and Breschini 2007), it is unclear if the field methods used for the investigation meet current professional standards. Additional details are needed to help support the conclusions in the report of no impact to archaeological resources.

**Architectural History Peer Review**

Ken Seavey’s (2010) *Phase I Historic Review, 26500 Val Verde Road, Carmel, Monterey County, California* is a brief letter report that summarizes the results of a pedestrian survey and archival research, which concludes that the single family residence is not eligible for historic designation. Although a letter report format is suitable for projects with minimal potential to impacts historical resources, the methods and evidence used to support the findings should be strengthened to ensure the study is in conformance with CEQA and County of Monterey guidelines for cultural resources.

The site setting and characteristics should be clarified. The subject property appears to be a single-family residence, situated on an agricultural lot that was historically used for farming activities. However, the letter lacks supporting information about the history of the property and its function to adequately characterize the property and setting. The letter describes an associated garage, but provides few additional details on the property as a whole. Further, the property does not appear to be within a subdivision; however, the author describes the residence as a typical California Ranch-style home that was common amongst post-war tracts. If appropriate, the property should be evaluated for its significance as an agricultural-related resource, as well as any other potential historic themes identified through a developed historic context. It is unknown if there are any additional buildings or structures on the site; given the presumed agricultural function of the property it would be expected that additional ancillary structures are present. The property should be evaluated for consideration at the local level of significance in addition to its significance under the CRHR criteria.

The letter is now five years old, which in terms of cultural resources analysis makes the information out of date. The California Office of Historic Preservation (OHP) notes that surveys should be updated every 5 years to consider properties that may have achieved significance since the survey was originally conducted and to incorporate resources that were initially overlooked. For this project, the associated garage was omitted from evaluation because it had not reached the 50 year eligibility threshold. It is doubtful that the garage would be historically significant or change the evaluation findings for the residence in any way, but it is a technical oversight that could be identified as a flaw in the analysis. It is recommend that any evaluation update to the property include the garage as well as any other buildings and or structures on the property that are older than 50 years of age.
Recommended Changes

To bolster the argument of no impact to historical resources, Rincon recommends the following actions to further provide clarity and certainty in this finding:

- Include references for archival research so that the primary source data collected can easily be verified.
- Update the historic analysis to include an evaluation of the residence and garage as single property, within the appropriate historic contexts. Provide additional information about the historic and setting characteristics. Confirm the presence or absence of additional structures.
- Prepare Department of Parks and Recreation (DPR) forms in accordance with the *County of Monterey Guidelines for Historic Assessments* (County of Monterey 2008).

Conclusions

In summary, Rincon did not find any specific evidence that would reverse the conclusions outlined in the cultural resource studies prepared for this project; however the methodologies and evidence provided in the documents do not strongly support the findings. Both studies were conducted at a cursory “due diligence” level and did not employ the methodologies and level of analysis to substantiate a CEQA-level analysis. This lack of supporting evidence to validate the administrative record could be called into question during the environmental review process. Rincon strongly recommends conducting supplemental studies to update the existing findings and conclude the cultural resources analysis for the project.

Sincerely,

RINCON CONSULTANTS, INC.

Christopher Durán, M.A., RPA
Principal Investigator, Cultural Resources

Shannon Carmack, B.A.
Senior Architectural Historian
References

California Office of Historic Preservation


County of Monterey

National Park Service

Seavey, Ken
2010 *Phase I Historic Review, 26500 Val Verde Road, Carmel, Monterey County, California.* Letter on file with the County of Monterey, California.
July 22, 2016
Rincon Project No. 14-00187

Bob Schubert, Senior Planner
Monterey County Resources Management Agency
Planning Department
168 W. Alisal St., 2nd Floor
Salinas, California 93901

Subject: Peer Review Addendum regarding Archaeological Technical Report and Architectural History Evaluation for the Carmel Rio Road Subdivision Project, Unincorporated Monterey County, California

Dear Mr. Schubert:

On October 14, 2015, Rincon submitted a memorandum to you presenting the results of a peer review of two cultural resource documents prepared for the property located at 15 and 26500 Val Verde Drive, within the Carmel Valley Master Plan Area, in unincorporated Monterey County, California.

The peer review memorandum regarded the following two cultural resources reports:

- *Phase I Historic Review, 26500 Val Verde Road, Carmel, Monterey County, California.* Prepared by Ken Seavey (Seavey 2010).

The peer review was conducted by Cultural Resources Principal Investigator Christopher Duran, M.A., RPA, who meets the Secretary of the Interior’s *Professional Qualification Standards* (PQS) for historic and prehistoric archaeology (National Park Service 1983), and Senior Architectural Historian Shannon Carmack, B.A. who meets the PQS for architectural history and history.

**Archaeological Report (Doane and Breschini 2007)**

Rincon recommended the following clarifications to support the conclusions in the report of no impact to archaeological resources:

- Indicate which areas of the project site were inventoried on a map and in the text, as well as which areas and percentage of the project site is covered by fill material.
- Add more details concerning the field methods (e.g., were those areas inspected for cultural resources surveyed using transects?). What was the transect spacing?
- Provide photos of the existing condition of the site.
- List the properties identified during the records search.
• Provide recommendations of archaeological sensitivity based on type and location of nearby resources.

Rincon Cultural Resources Program Manager Kevin Hunt spoke with Gary Breschini of Archaeological Consulting on July 19, 2016. Dr. Breschini confirmed the following regarding the archaeological study:

• Archaeologist Mary Doane conducted the survey. She worked for Archaeological Consulting for 25 years with additional time at State Parks.
• For a parcel this size (small) they conduct tight zig-zig transects and thoroughly cover the entire site.
• They did survey the entire project site and if something [i.e., an archaeological resource] was there they would have found it.
• He believes the project site is not sensitive but included standard unanticipated discovery mitigation language because he has seen cases in the region where burials are found in places with no archaeological materials present on the surface.
• Archaeological Consulting is no longer under contract to the project applicant and will not prepare a revised report or memorandum that responds to the peer review.

Based on these responses Rincon concludes that the project site was adequately surveyed to current professional standards and that the report’s findings of no impact to archaeological resources are correct and defensible. Rincon recommends no additional archaeological resources work for the project beyond the implementation of mitigation measures to be identified in the project environmental impact report (EIR).

Architectural History Report (Seavey 2010)

Rincon’s peer review memorandum recommended the following actions to bolster the argument of no impact to historical resources:

• Include references for archival research so that the primary source data collected can easily be verified.
• Update the historic analysis to include an evaluation of the residence and garage as single property, within the appropriate historic contexts. Provide additional information about the historic and setting characteristics. Confirm the presence or absence of additional structures.
• Prepare Department of Parks and Recreation (DPR) forms in accordance with the County of Monterey Guidelines for Historic Assessments (County of Monterey 2008).

Kent L. Seavey prepared an addendum to the Phase I historic review dated June 24, 2016, that responded to Rincon’s peer review memorandum. Seavey’s 2016 addendum presented the requested additional information about the historic and setting characteristics as well as the requested references. Based on the content of Seavey’s addendum, Rincon finds that the peer review comments were adequately addressed and that the findings of Seavey’s 2010 report are correct and defensible. No additional architectural history work is recommended.
In summary, based on the responses to Rincon’s cultural resources peer review memorandum, the results of the archaeological and architectural history reports are accepted.

Sincerely,

RINCON CONSULTANTS, INC.

Christopher Duran, M.A., RPA
Principal Investigator, Cultural Resources

Shannon Carmack, B.A.
Senior Architectural Historian