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Dear Mr. Lombardo:

In August of this year, Meg Clovis surveyed and evaluated the house located on Camino Real, 4 NW of 11th Avenue, Carmel-by-the-Sea (APN 010-275-006). She concluded that the property was eligible for listing in the Carmel Inventory of Historic Resources because it “is a good example of a Tudor Revival cottage and clearly illustrates the distinctive characteristics of the style.” She also states that it is eligible for listing because it was designed and built in 1933 by Ernest Bixler and rebuilt after a disastrous fire in 1940 by Miles Bain, both of whom are listed as significant builders in the *Historic Context Statement: Carmel-By-The-Sea*, rev. ed., (PAST Consultants, 2022).

The Eligibility Criteria for the Carmel Inventory of Historic Resources states in Section 17.32.040.D.1 that a resource is eligible for the Carmel Inventory if it was designed by an individual recognized as significant in the *Historic Context Statement*. But it also states, in Section 17.32.040.D.2, that a resource is eligible if it was “designed and/or constructed by a previously unrecognized architect, designer/builder or contractor if there is substantial, factual evidence that the architect, designer/builder contributed to one or more of the historic contexts of the City to an extent consistent with other architects designer/builders or contractors identified within the Historic Context Statement.” That is to say, a resource is not eligible for the Carmel Inventory because it was designed by an architect listed as significant in the *Historic Context Statement*, as Meg Clovis asserts, but it may be eligible if it was designed by either a builder recognized as important or a builder previously not recognized as significant. In other words, it is only necessary to establish that the builder was significant for the resource to eligible for the Carmel Inventory. But it is not the basis for listing. The resource must be shown to be individually significant to be listed.

On 10 November 2023 I surveyed the property and subsequently conducted research on it. In my opinion it does not meet Criterion 3 of the Carmel Inventory of Historic Resources and should not be placed in it.

The single-family residence on Camino Real, 4 NW of 11th Avenue was built in 1933 and following a disastrous fire in 1940 rebuilt by a contractor using the original plans. The house is one-story in height with a partial basement and faces east toward Highway 1



Figure 1. Looking northwest at south and east elevations of the house, 10 November 2023.



Figure 3. Looking southwest at east and north sides of former garage, now an office and a library, 10 November 2023.

and the distant Santa Lucia Mountains. It encloses 1,562 square feet, including 237 square feet devoted to the partial basement, which Ms. Clovis neglects to mention. The house is irregular in plan and rests on a concrete foundation. The walls are clad with stucco painted white, while the gables are distinguished by rough-sawn siding, nailed down either horizontally or vertically. Ms. Clovis states that fenestration consists of “tall multi-paned casement windows, typical of the Tudor style,” but in fact the casements, which are each distinguished by six lights, show no variation from the casement windows in many early Carmel houses that are not Tudor. On the north side of the house near the rear is a small projecting porch with a balustrade and wooden steps and decking. It was constructed after 1960, the year the Residential Building Record was prepared. At the back of the house, a modern wooden deck extends west. It should be noted that when the house was constructed and later rebuilt, wood comprised the window sash, but the replacement windows, which date to 2020 and 2021, have an exterior of aluminum with a black matte finish, despite the assertion by Ms. Clovis that “the house retains materials from its original construction in 1933 and the rebuild of 1940.” Additionally, all the exterior doors in the house were replaced over the years 2020 and 2021 with French doors by the current owner, except for the pressed-wood door opening to the basement, which was replaced with a Fiberglas door. The partial exterior brick chimney on the south side of the house was coated with stucco set with scattered large stones in 2023 by the current owner. Although Ms. Clovis makes no meaningful mention of the original garage, its interior was remodeled in late 2021 or early 2022, and it currently serves as an office and a library.

The Carmel context statement was drafted in 1994 and has been updated on three occasions, most recently in 2022, when the text was brought up to date by Past Consultants. It provides relatively little information on Tudor Revival houses. The Tudor buildings in the business district are said to “typically feature characteristic half-timbering and gabled rooflines (page 52).” Many of the early Carmel houses feature “a detached garage, usually front-gabled, sided with board-and-batten, entered via an arched vehicular door, and set close to the street (52)” The former garage on Camino Real has a front gable with a wing, and although it is sided with board-and-batten, it was entered through a rectangular door, not an arched door, and was located at the southwest corner of the lot, not “close to the street.”

The context statement states that “Tudor homes were usually stuccoed, half-timbered, and gabled (53).” Needless to say, there is no half-timbering in the house on Camino Real. The “fanciful Tudor cottages” designed by Hugh Comstock are conflated with the Tudor style in the context statement of 2022. These houses were characterized by “steep gables, decorative half-timbering set on stuccoed surfaces, and diamond-paned windows (53).” The roofs on the Camino Real house are pitched at slightly more than 30 degrees, which according to Virginia Savage McAlester, *A Field Guide to American Houses* (New York, 2013), is at the lower end of a normal slope, which range from 30 at 45 degrees. Steeply sloped roofs have a slope of more than 45 degrees. The house has no half-timbering and but a single small window with diamond panes, located in the façade.

Despite Meg Clovis's assertion that the house on Camino Real, 4 NW of 11th Avenue, is "a good example of a Tudor Revival cottage," it has absolutely no architectural features that suggest any particular style, including Tudor. To the pedestrian or motorist passing by, the chief interest is the splendidly landscaped yard. It should not be placed in the Carmel Inventory of Historic Resources.

Sincerely yours,

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

Anthony Kirk, Ph.D.