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City of Carmel-by-the-Sea
Planning & Building Dept.

Dear Mr. Weiner:

Thank you for the opportunity to review the proposed Carmel Mission Phase II Master Plan (3080 Mission Rd., APN# 009-531-003) in Carmel, for consistency of the proposed changes with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

The Secretary's Standards identify four primary treatment approaches to historic buildings. They are Restoration, Preservation, Reconstruction and Rehabilitation. Rehabilitation is the Standard being employed for the Carmel Mission project.

Rehabilitation is defined as the act or process of making a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.

The Secretary's Standards encourages "placing a new addition on a non-character-defining elevation." and locating alterations to historic properties in areas where previous alterations already exist.

As stated in the 1992 National Park Service *Illustrated Guidelines for Rehabilitating Historic Buildings*, "The Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility."

Character-defining features and significance ratings are found in the *Carmel Mission Basilica Historic Structures Report (HSR)*, By The Architectural Resource Group of San Francisco, dated August 2010 (copy of the HRS is on file with the City of Carmel by-the-Sea).

The subject property is owned by Diocese of Monterey, a Corp., Sole, which proposes to slightly modify the existing design of the Convento and Mora Chapel; Gift Store; Downie Orientation Center (museum); Entry Arch; Blessed Sacrament Chapel; Orchard House Complex & Outdoor Spaces (See plans & drawings w/photos provided).

The primary purpose of the proposed work is to update the existing infrastructure including a new bathroom space; provide for seismic safety; establish an overall safe path of travel for handicapped access; improve parking and visitor access to the Downie Museum space & Mission Basilica; replace the existing deteriorated hardscape in both the Basilica Forecourt & Quadrangle and slightly modify the roof structure of the c. 1970 Carriage gate, for needed event and maintenance access (see photos and plans & drawings provided).

As noted above, the Standards recommend new additions be placed on secondary elevations, and where alteration has already occurred. In general, the proposed changes to the subject property are on secondary altered elevations.

As proposed, the work shall reuse, to the extent feasible, available historic building materials, and where necessary match required replacement features in kind. New work, particularly in the area of the National Historic Landmark listed Basilica, is differentiated from the old, but compatible with the size, scale, proportions and massing to protect the integrity of the subject property and its environment. If removed in the future, the essential form and integrity of the national historic property and its environment will be unimpaired.

The subject property was listed as a National Historic Landmark in 1962, and listed on the National Register of Historic Places in 1967. It is also listed in the 2003 Carmel Historic Resource Inventory, and the California Register of Historical Resources at the national level of significance (see Statement of Significance on P. 37 of the HSR on file with the City of Carmel by-the-Sea).

NOTE: For an historic chronology and description of the subject property during its period of significance, between 1793 and 1947, refer to pp. 21-39 in the HSR noted above (also see colored chronological floor plan provided).

In every rehabilitation project, caution should be exercised in pursuing any plan that would radically change character-defining spaces or obscure, damage or destroy historic features or finishes.

The owners have proposed the following alterations and additions for contemporary usage:

FRONT (EAST) ELEVATION (primary, altered)

As proposed, the northern parking lot area will be regraded to provide for better drainage, handicapped parking and new paths of travel and entries to access the Basilica forecourt and Museum Store (see plan sheets A-2.1; C-1.1; A-5 and A-32).

The Secretary's Standards for Rehabilitation recommend designing and installing additional entrances, or porches when required for the new use in a manner that preserves the historic character of the building(s), i.e. limiting such alteration to non character-defining elevations.

In this instance, the proposed alterations would include a partial reconstruction of a c. 1928-1938 curvilinear arch, over the entry gate fronting the forecourt, that was previously removed for condition issues. The new feature will match, in kind, the previous arch.

It would also include removing part of the existing nonhistoric plaster wall, where it abuts the Gift Store wall of the 1941 Convento Building, to provide a pedestrian entry with new wood gates, matching the existing gates of the current entry (see plans & drawings, Sheet A-14 & A-17 provided). The existing entry gate is required to provide vehicular access during funerals and other church related functions.

As proposed a window and door at the north end of the east facing facade of the Gift Store would be physically switched to provide for better traffic flow into the 1941 Gift Shop area. The existing door and window, including the metal grille will be used in this transfer, with minor cut and fill necessary in the respective voids. A simple redwood trellis w/plantings would surround the moved door.

An existing window on the east end of the north side-elevation of the Gift Shop is proposed for replacement with a Dutch-door ticket window, serving the proposed Entry Patio, as part of the new path-of-travel design. The new doorway will also provide code required emergency egress from the gift shop area (see plans & drawings Sheet A-13, A-16, A-18 & A-32 provided).

The only other changes proposed for the east facing facade will be a slight raising of the path-of-travel to the south end of the 1947 Blessed Sacrament Chapel. This will require a new set of concrete stairs to accommodate the increased porch height, and permanent planter boxes in the two south bays of the building to address code required railing heights (see plans & drawings, Sheet A-18 provided).

The proposed changes along the east facing facade of the Gift Shop and Blessed Sacrament Chapel, while on a character-defining elevation, are primarily related to code required ADA compliance. They consist of minor grade level and parking adjustments for a handicapped path of travel; replacement of an historic entry gate arch; minor reconfiguration of a window and door, and one window change to a door.

All proposed alterations are on 1941 and 1947 additions to the historic property, They have been designed so that there is the least possible loss of historic materials, and that the character-defining features of the historic property are not obscured, damaged or destroyed. They are consistent with the Secretary of the Interior's Standards for Rehabilitation.

BASILICA FORECOURT & DOWNIE MUSEUM (primary, altered)

As proposed, a portion of the existing concrete pavement in the Basilica Forecourt will be removed to allow for ADA grading and utility upgrading, then it will be replaced in kind, over the new grades. Modified ADA paths of travel will connect the Forecourt entryway to the Downie Orientation Center Building and restrooms, to the Basilica and to the Mora Chapel Building; there will be some door swing reversals for code required exiting (see plan sheets A-2.1; C-1.1; C-2.1 and A-6, A-13; & A-15).

The Secretary's Standards for Rehabilitation recommend identifying buildings and their features as well as features of the site that are important in defining its overall historic character. Site features can include walkways, lighting, fencing, signs, benches, fountains terraces, plants, trees and archaeological features that are important in defining the history of the site, and by protecting and maintaining the historic resource by providing proper drainage. Designing ramps when required by the new use so that they are as unobtrusive as possible.

As proposed, the portion of the concrete pavement to be removed, when replaced, will include ADA ramping to connect the entryway and arrival patio with existing access points for the fountain, gardens, Downie Orientation Center & restrooms, to include a new ramp connecting the Forecourt to the western exit point adjacent to the Indian Cemetery. Utility and drainage upgrading will also be undertaken, with the least possible soil disturbance.

It is recommended that the new concrete paving employ an appropriate earth tone tint consistent with the historic character of the Forecourt setting (see plans & drawings, sheet C-1.1 provided).

1921-1924 Downie/Orientation Center (primary, altered)

Soil disturbance around the building will be minimized, reducing the possibility of disturbing unknown archeological materials. The preference for needed code compliant barriers should be plant material rather than walls or railings, if feasible, to help maintain the historic relationship between buildings, landscape features and open space.

As proposed, the building envelope will be seismically retrofitted (see plans & drawings, sheet A-22 provided).

The proposed accessible family bathroom will be located in an existing storage room on the NW side of the orientation center, consistent with Rehabilitation Standards #9 & #10 (see copy of the Secretary's Rehabilitation Standards provided). Only the existing door will need to be slightly modified to provide accessibility.

One partial-width, interior adobe wall is proposed for removal in order to expand the interpretive space. The work should be undertaken in such a manner that this feature can be replaced in future, consistent with Rehabilitation Standard #10.

Some existing modern access steps to the orientation center are proposed for minor height adjustment, based on the reconfiguration for code compliant ADA ramping. The changes will not significantly affect the character-defining features of the building (see plans & drawings, sheet A-6 & A-15 provided).

The treatments, as proposed, for the Basilica Forecourt and Downie Museum/Orientation Center are consistent with the Secretary of the Interior's Standards for Rehabilitation.

1921-1924 MORA CHAPEL (primary, altered)

The Secretary's Standards for Rehabilitation recommend identifying, retaining and preserving a floor plan or interior spaces that are important in defining the overall character of a building. This includes the size, configuration, proportion and relationship of rooms, corridors, features and spaces.

As proposed, the Mora Chapel will undergo minor seismic retrofitting;

cleaning and conservation, as necessary; add some new, nonpermanent exhibit panels and cases; A new interior window in the doorway leading to the Convento Museum space, and minor modification (reverse swing) of the three existing exterior doors, for code required emergency egress. The floor of the south facing 1947 Loggia will have a new, ADA accessible boardwalk, and reversible interpretive panels in the voids between the two westernmost support columns (see plans & drawings, sheets A-8, A-9, A-16, A-23 & A-26 provided).

The treatments, as proposed, for the Mora Chapel are consistent with the Secretary of the Interior's Standards for Rehabilitation.

1932-1941 CONVENTO MUSEUM WING (secondary, altered)

As proposed, the Convento Museum wing (east & west) will undergo needed seismic retrofitting & reinforcement; cleaning and conservation, as necessary; add some new, nonpermanent exhibit panels and cases; remove steps & guardrail from interior access door to the Mora Chapel and fill in the existing staircase; add header for proposed window separating the museum space from the Mora Chapel.

Add new structural shear walls of adobe w/footings in the kitchen area as needed for structural strengthening, while retaining existing interior adobe walls, to the extent feasible for life safety; add new adobe shear wall in Library space for structural strengthening; expand adobe depth to the west walls of the Grand Sala and Serra's Cell for structural strengthening.

Remove existing east/west partition walls in the Corridor leading to the Gift Shop, and relocate south, to case proposed staircase. A new adobe wall will frame the west end of the staircase; a dumbwaiter is proposed for the SE corner of the staircase enclosure to move object to the attic storage space. A new door is proposed for the Gift Shop, providing access to the staircase enclosure.

Two existing doors on the south wall of the 1941 Convento Museum will provide code required emergency egress accessing the proposed ADA boardwalk in the 1947 Loggia (see plans & drawings, sheets A-10, A-11, A-23 thru A-25, A-27, A-30 and C2.1 provided).

The treatments, as proposed, for the Convento Museum space are consistent with the Secretary of the Interior's Standards for Rehabilitation.

1947 BLESSED SACRAMENT CHAPEL (primary)

As proposed, the Blessed Sacrament Chapel will undergo needed seismic retrofitting & reinforcement; cleaning and conservation, as necessary; and the addition of ADA accessible boardwalks covering the Loggia on both the east and west elevations.

A new code required handicapped access ramp to the 1947 Loggia from the Main Quadrangle is proposed for the west elevation.

A low, shed roof was added (c 1970), above the Harry Downie designed wooden carriage gates, that connect the Blessed Sacrament Chapel to the Rectory Building in the SE corner of the Main Quadrangle. This nonhistoric feature impedes large delivery vehicles and building equipment from access to the Main Quadrangle and is proposed for removal, as it screens visual access to one of Mr. Downie's later projects. (see plans & drawings, sheets A-20, A-25 and C2.1 provided).

The treatments, as proposed, for the Blessed Sacrament Chapel space are consistent with the Secretary of the Interior's Standards for Rehabilitation.

1960 MAIN QUADRANGLE (secondary, altered)

The Secretary's Standards for Rehabilitation recommend protecting and maintaining buildings and the site by providing proper drainage to assure that water does not erode foundation walls; drain towards buildings; nor erode the historic landscape. Replacing in kind an entire feature of the building or site that is too deteriorated to repair-if the overall form and detailing are still evident-using the physical evidence to guide the new work.

As proposed, the existing 1960 concrete Main Quadrangle will be removed to provide for needed drainage, sewage, storm water and other infrastructure improvements, including some additional planting areas. Once this work is finished the new pavement will be laid, matching in kind the existing pavement pattern/type. Existing planter areas will be regraded and replanted (see plans & drawings, sheets C-1 thru C-4.1 provided).

The treatments, as proposed, for the Main Quadrangle are consistent with the Secretary of the Interior's Standards for Rehabilitation.

Proposed New Restroom (secondary)

The Secretary's Standards for Rehabilitation recommend designing new exterior additions to historic buildings or adjacent new construction which is compatible with the historic character of the site and which preserve the historic relationship between a building or buildings, landscape features, and open space

As proposed, the new restroom will be located in the SW corner of the Main Quadrangle, adjacent to the Junipero Serra School well away from the principal historic components of the Mission complex.

The design of the feature is in the form of a simple rectangle, with a hipped roof with Mission tile. The only fenestration being two small multi-paned wood windows, high in the wall of the east facing facade. The entry being screened by a high stuccoed panel. The exterior finish is stucco with a simple pebbled texture, matching an existing modern restroom near the Munras Courtyard. The feature will be constructed over pre-existing pavement.

(see plans & drawings, sheets A-12, C-4.1 provided).

As noted above, the Standards recommend new additions be placed on secondary elevations, and where alteration has already occurred. The proposed changes to the Carmel Mission and its dependencies are generally on secondary or altered elevations.

As proposed, the work shall reuse, to the extent feasible, available historic building materials, and where necessary match required replacement features in kind. New work, primarily the new restroom building, will be clearly differentiated from the old, but compatible with the size, scale, proportions and massing to protect the integrity of the subject property and its environment. If removed in the future, the essential form and integrity of the historic property and its environment will be unimpaired.

CONCLUSION

The subject property retains a sufficient degree of physical integrity as constructed in 1797, and subsequently restored, to evoke a strong sense of time and place and of feeling and association with the founding, and subsequent expansion of the Catholic Mission chain in Alta California.

It is also significant for its association with Fra. Junipero Serra, O.F.M., the Father Presidente of the California Mission Field, and the only California cleric to be raised to Sainthood by the Catholic Church. It is listed as a National Historic Monument and on both the National and California registers of historic places.

CEQA states in CCR Section 15064.5 (2)(B) that a change which demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that account for its inclusion in a local register of historical resources may constitute a substantial adverse change in the significance of the resource. However, CEQA also notes that the degree of potential adverse change can be considered "proportionate to the level of significance of an historic resource" based on its relative importance in history.

The proposed work on the subject property will be executed consistent with the *Secretary of the Interior's Standards for Rehabilitation*, with the least possible loss of historic materials so that the remaining character-defining features of the historic resources will not be obscured, damaged or destroyed. All proposed changes are reversible. As proposed the new work will not create a significant change to the historic building and will not cause a significant adverse effect on the environment.

MITIGATION

The proposed project is in conformance with the Secretary of the Interior's *Standards for the Treatment of Historic Properties* under the standard for Rehabilitation. No mitigation is needed for this project.

Respectfully Submitted,

Kathleen Seawing

Carmel Mission

Chronology of Construction/Restoration Dates

