



My Comments on 7th and Dolores Building for HRB resolution

Erik Dyar <erik@dyararchitecture.com>

Mon, Apr 26, 2021 at 7:01 PM

To: Evan Kort <ekort@ci.carmel.ca.us>, Brandon Swanson <bswanson@ci.carmel.ca.us>

Hi Evan and Brandon,

Redacted due to confidential employee information

I promised some comments to help Staff prepare a resolution of non-compliance for the next HRB meeting on the 7th and Dolores building (Palo Alto Savings and Loan) and its component, the Community Room, so here they are below:

The argument for significance includes two major points: 1. The significance of the Palo Alto Savings and Loan Building, and 2. Whether its component, the Community Room can be correctly evaluated apart from the attached Main bank building.

1. Building's Significance

Meg Clovis in all her historic evaluations of the bank property has always considered the bank as eligible for listing in the California Register for Historic Resources under Criterion Three Architecture. The only disagreement with the previous decisions by the HRB seems to be whether the building has "Exceptional" significance per City of Carmel Municipal Code Section 17.32.040.H and the National Criterion G. allowing listing for buildings under 50 years of age. She basically acknowledges that the building would meet the exceptional level under National Criteria G (which emphasizes the understanding the historic contexts of an area to determine exceptional significance) by writing, "...undoubtedly the Palo Alto Savings and Loan complex will be found to be a strong representative of its context within the theme of architectural development." Ms. Clovis only disagreement seems to be in how the Historic Context Statement is written in that it has a period of significance on the document through 1965. Yet she acknowledges, the Context Statement DOES identify the Bay Region style and/or Second Bay Region Style as important substyle within the larger THEME of Modern architecture. So Carmel's existing Historic Context Statement DOES include this theme of architectural development in Carmel and therefore, the building is "representative of at least one theme" in the existing Historic Context Statement. Ms. Clovis seems to just want the theme to be more thoroughly discussed and additionally acknowledges that it most certainly would be in the Historic Context Statement update currently underway. In fact, I believe it certainly is the case in the draft Historic Context Statement update which also mentions the Palo Alto Savings and Loan as an exceptional example of the masters Will Shaw and Walter Burde.

I would like to add that one of the prime purposes of historic preservation and our historic preservation ordinance is to preserve the best pieces of the historic development of a place/city through its significant architecture--to preserve these buildings which represent important periods in a City's heritage. The Palo Alto Savings and Loan building can be considered the most exceptional and significant building to be constructed in the commercial district of Carmel during the entire decade of the 1970's, perhaps (as the Ms. Clovis quotes the State Historic Preservation Officer) in the latter half of the 20th century.

As a member of the HRB, I believe it is our responsibility to make determinations which sometimes fall into this sort of grey area, although the grey area here is virtually non-existent. The building is acknowledged as exceptionally significant and is 49 years -- in less than one year, it will only need to be of normal significance for inclusion on the inventory.

Furthermore, the "exceptional significance" clause for inclusion of resources under 50 years old on the Historic Inventory (17.32.040.H) simply states this: "A resource less than 50 years old may be eligible if it is of exceptional importance to the City... based on its unusually strong contribution to history, architecture, engineering or culture..." I would argue the intent of this section is not to quibble with technicalities, but if there is manifest evidence of exceptional significance then that is enough--not whether the City hasn't updated its Context Statement as it was required to. In fact, if the 1965 date on the existing Context Statement is the only argument for not including the building on Carmel's inventory, and Carmel was required to update it every 5 years, then this non-compliance with Carmel's LCP I would think could trigger a valid standing for appeal to the Coastal Commission.

So, I wanted to express the above to have staff understand why the HRB (or at least this voting member) consistently has ruled the building should be added to the Carmel Historic Inventory. I want to make sure the City Council understands our position.

All this being said I do have a basic question of Staff, which is if the building is significant per CEQA vs. being on the inventory, is there a difference between how we deal with it in terms of the Secretary's standards? I assume it is at least protected against demolition.

2. The Community Room: A part not separate from the Historic Resource

The second main topic is how the Community Room can be viewed as somehow not a part of the historic resource. Let's first take the example used in the staff report of the detached garage. Yes, sometimes a detached garage can be deemed not significant while the main house is considered significant. This can be the case when (as is not unusual) the detached structure is built at a different time than the main structure, not part of the original design or designer's conception for the property, not contained in the original design documents, not designed or constructed by the same significant designer or builder, or not having similar character defining elements done with the same quality of the main house. But if a garage is part of the original design, creates spatial relationships on the property which are in themselves character defining, uses the same character defining elements of construction and detail as the main house, are built at the same time, designed and built by the same Masters---then YES, of course, a detached garage would be historically significant. I certainly know of Comstock's and a Thodos where this would be undeniably the case. So, I find the garage analogy not appropriate.

In the case of the Community Room, despite being an auxiliary use it was still part of the original concept of the building from the beginning. There's main and auxiliary uses in almost every building. This doesn't make the architecture enveloping one use less significant than the other. It is included and part of the original design/construction documents for the building, including importantly the West street elevation, which shows how it is integral to the design composition of this facade of the building. The community room section of the building was designed right along with the rest of the building and contains **ALL** the character defining features called out in Ms. Clovis Oct. 3, 2019 evaluation:

shed roof and copper roofing
angular forms and irregular massing
plate glass window walls
traditional materials used within a Modern architecture vocabulary
Integration of the building with its setting
Integration of the outdoors with interior spaces
Redwood siding and beams

Therefore, Ms. Clovis' statement that the Community room section "does not contain enough distinctive characteristics to be considered a true representative of the Bay Region style and therefore does not meet this section of Criterion 3" is wrong on its face. The Community Room is built with the same character defining features as the rest of the building with the same quality.

The community room was constructed at the same time by the same builder. It's materials, detailing, composition are ALL at the same level of quality as the rest of the building. I would additionally argue that the South Elevation of the Community Room is an exceptional composition itself which deserves to be given some space to be seen from the new construction to be built. Especially when approaching the building from the South, the Community Room form is the passersby's introduction to the historic resource and is an obvious part of it. I would strongly argue that the Community Room element of the building adds to the complexity and richness of the resource which, if taken away, would significantly negatively impact the quality of architecture of the building. Additionally, I don't think you could argue that the two master architects, Will Shaw and Walter Burde, did not consider the South Elevation of the Community Room as the South Elevation of their building--it was and is. If taken away it presents a part of the building that was not meant to be the first thing you look at on the South side.

It seems to me a very specious argument to say the Community Room was a "postscript" and was "tacked on". The manifest design intention of how this section of the building is integrated with the rest is powerful. Whatever quote she seems to be referring to in the Pine Cone is irrelevant compared to the master architects' obvious care and taken and evidenced in its design, the design documents and the built work.

I can really not think of any historically significant piece of architecture where an element so integrally a part of the design and built work, if removed, would not negatively impact the resource or would be questioned as not being part of the resource. Simply because an element of a building is smaller or "subordinate" to other parts does NOT make them less important to the whole as a piece of architecture.

I would also like to address this common refrain that the Community is a separate building I guess because there is no interior circulation. As Brandon is aware, other jurisdictions view a structural connection between building sections as evidence that they are one building and are treated as such. For example, in Monterey County, if there is a structural

connection, like a covered walkway, the two sections that are connected by it are considered the Main structure--with main structure height limits and setback regulations.

This structural connection in the design of this building was very intentional and strong--not to mention the very intentional and strong spatial connection that the two elements create. This is all part of one piece of significant architecture--one historic resource.

Please let me know if you have any questions, comments, clarifications...

Thanks to you both,

Erik.

Historic Resources Board (HRB) Meeting, April 19, 2021

Subject: Design Review Application DR 20-395

Demolition of Palo Alto Savings and Loan Community Room

Comments Made by HRB Member, historian Kathryn Gualtieri

Numerous reports and evaluations from a city consultant and staff were received by the Board in preparation for the meeting.

#1) **October 3, 2019 Report** was prepared for a proposed demolition of the Community Room that was subsequently withdrawn. The Report referred to pertinent testimony from a number of respected architects who opined that the former Palo Alto Savings and Loan Bank was an exceptional example of its architectural style, the work of master architects, retained a high level of integrity and embodied the distinctive characteristics of its type and period. Their professional opinions confirmed that sufficient time had elapsed since the construction of the Bank complex to allow for a scholarly perspective on its significance and its place in Carmel's architectural history.

#2) **June 2020 Evaluation** provided the specific reason for the existence of the Community Room. Following the Bank president's mandate, staff in each city where a branch was to be located, was directed to become more involved in local improvement projects and to provide meeting space for the community as part of the Bank's public relations strategy. Burde and Shaw, the architects of the Bank complex, were tasked to design a small building separated from the Bank that would be used for this express purpose. The consultant's view that the Community Room was simply "a postscript to the architects' intentions" is in error. There is additional proof from *The Carmel Pine Cone* that the room was requested by the client to help the Bank forge good community relations. Equally important, the Community Room's design mirrors the Bank building's character defining features: a shed roof covered with copper, vertical heart redwood siding, large plate glass window walls, and a walkway connecting the room to the main structure.

#3) **Mar. 1, 2021 Report** reviewed a second demolition proposal and evaluated the Community Room solely on its individual merit. This approach does not conform to historic preservation principles. The consultant's view

that the architects' creative energies were solely focused on the main Bank building and nothing else is questionable. The Community Room is not required to become significant in its own right. There are no historic preservation rules that would force it to stand on its individual merit in order to qualify for historic status. The Community Room remains a vital part of the architects' original design. While it is subordinate to the former Bank building, it continues to have an important spatial relationship to it.

#4) **April 19, 2021 Staff Report** examined the consultant's opinion and agreed that an ancillary structure might be evaluated on its individual merit. Using the example of a historic home with a detached garage, staff reasoned that if a garage were removed, it wouldn't damage the house's historic integrity. On the contrary, a garage is a related feature of a house, is part of an architect's design, and is included in the plans for the site. Some years ago, the HRB considered a homeowner's request to demolish a historic garage designed by renowned Carmel master builder, Hugh Comstock. The owner of the Birthday House at the SW corner of Sixth and Santa Rita expressed a desire to demolish a dilapidated detached garage, but the HRB voiced its strong concerns about destroying an important part of Comstock's original design. The Board voted to repair and renovate the garage, which exists on the site today. As with the Comstock house, the Bank building and the Community Room are a historically related unit. Though the room is subordinate to the Bank, it has retained its historic integrity and is an integral component of the original design as approved by the architects' client, the owners of the Palo Alto Savings and Loan Bank.

The four Reports agree that the Bank complex is eligible for listing on the California Register of Historic Resources for purposes of CEQA. Both buildings are the work of two master architects, Walter Burde and Will Shaw, who are listed in the Carmel Historic Context Statement, whose office was located in downtown Carmel, and whose other individual works include the Christian Science Church in Carmel, the original Monterey Airport Terminal and Tower, the Custom House renovation in Monterey and the Highlands Inn reconstruction. Shaw also collaborated with renowned photographer, Ansel Adams, to create the Foundation for Environmental Design, a group that supported worthy projects that blended into the natural environment.

Earlier, when the Carmel City Council considered the HRB's decision to add the Bank complex to the city's historic inventory, the argument centered on

the issue that the Bank wasn't 50 years old, despite the fact that many architects and other respected professionals provided expert evidence that the Bank complex was of exceptional significance and was eligible for listing.

There is sufficient substantial evidence that would allow the HRB and the City Council to make the finding of non-compliance with the Secretary of the Interior's Standards for the proposed demolition project. A new construction project on the site of a demolished Community Room would constitute an adverse effect on the Bank complex and destroy the original concept as designed by two of Monterey County's most respected master architects.

Carmel is a Certified Local Government and recognized as such by the State of California. The City is a partner with the State in historic preservation matters. Why would the City choose to disregard historic preservation principles, while at the same time, apply for a state grant to fund a desired preservation project? That seems an unnecessary risk for the City to take.