



Preserving Santa Barbara's
Historic Sites of Enduring
Community Value

P.O. BOX 92121
SANTA BARBARA
CA 93190-2121

February 8, 2016

RE: Board of Supervisor's Agenda for February 16, 2016

Appeal of Montecito Planning Commission's Decision to
Require Preparation of an EIR for Casa Dorinda Project

Dear Santa Barbara County Board of Supervisors:

At our meeting of February 4, 2016 the Pearl Chase Society Board reviewed the Casa Dorinda Project, the Post Hazeltine Peer Review Report of the project, and the Post Hazeltine Comments to our letter to the Montecito County Planning Commission dated December 15, 2015.

Although the Society deeply regrets the loss of the South Bridge on the Casa Dorinda property, we do agree with the added preservation measures as outlined in the Peer Review Report and find that we are in agreement with the Peer Review Report Mitigation Measures and Comments to our letter.

Sincerely,

Barbara C Lowenthal

Barbara C Lowenthal
President

POST/HAZELTINE ASSOCIATES

Architectural Historians

2607 Orella Street
Santa Barbara, CA 93105
Phone: (805) 682-5751
Email: posthazeltine@cox.net

1.0 INTRODUCTION

This report was prepared for the County of Santa Barbara Planning and Development Department as part of the development review process for the proposed Casa Dorinda Master Plan Update (Case No. 14RVP-00000-00005, February 2, 2015). The project parcels are located at APN 009-640-001, a 47.31-acre parcel encompassing the retirement community and APN 009-070-057, a one-acre parcel that is the site of the Director's residence. The parcels are located at 300 Hot Springs Road in Montecito, an unincorporated community in Santa Barbara County, California. The report will assist the County of Santa Barbara in ensuring compliance with the California Environmental Quality Act (CEQA) and the County's Santa Barbara County Comprehensive Plan, Land Use Element and the Montecito Community Plan Update as they apply to historic resources. Post/Hazeltine Associates prepared the report under contract to the County of Santa Barbara. The primary author of the report is senior partner, Pamela Post, Ph.D. The report will provide an evaluation of a Phase 1-2 Cultural Resources Study, Historic Resources (2014) prepared by and Alexandra Cole of Preservation Planning Associates.

1.1 Project History and Previous Studies

Casa Dorinda, a planned retirement community, is requesting County approval of a revised Major Conditional Use Permit (CUP) which comprises the "Master Plan" for the next 7 to 10 years (Draft Mitigated Negative Declaration: February 2, 2015: 1). The project encompasses a combination of demolition, renovation and new construction to meet the needs of the facility's residents for the foreseeable future. A detailed overview of the proposed project can be found in Section 1.0 of the Draft Mitigated Declaration (MND) that is currently being circulated.

In 2014 a Phase 1-2 Cultural Resources Study, Historical Resources (HRR) identifying potential significant historic resources on the project parcels and evaluating the impact of the proposed Master Plan project on significant historic resources identified in the report. The HRR concluded that the estate house built in 1918 and a concrete and sandstone bridge spanning Montecito Creek located on APN 009-640-001 were eligible for listing as significant historic resources at the County level and for listing in the California Register of Historical Resources (CRHR). Because these two resources are eligible for listing as significant historic resources at the local and state level they were determined to be significant historic resources for the purposes of environmental review (Preservation Planning 2014: 12).

2.0 REGULATORY SETTING

Section 21084.1 of the Public Resources Code provides the framework for determining whether a resource is a historic resource for CEQA purposes. Historic resources that are listed in or eligible for listing in the California Register of Historical Resources (California Register), that are, *per se*, significant other resources, that are officially designated on a local register, or that are found to be significant by the State Historic Preservation Officer (SHPO) under Section 5024.1(j) of the Public Resources Code are presumed to be significant. According to CEQA in determining potential impacts on historical resources under CEQA, projects are reviewed using the Secretary of the Interior's Standards (Standards). A "substantial adverse change" means "demolition, destruction, relocation, or alteration of the resource such that the significance of an historical resource would be materially impaired." The setting of a resource should also be taken into account in that it too may contribute to the significance of the resource, as impairment of the setting could affect the significance of a resource. Material impairment occurs when a project:

1. *Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources;*
2. *Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or*
3. *Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.*

CEQA Section 15064.5 defines historical resources as follows:

- (1) *A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources Commission (State CEQA Guidelines Section 5024.1, Title 14 CCR, Section 4850 et seq.).*

There are several ways in which a resource can be listed in the California Register, which are codified under Title 14 CCR, Section 4851.

- A resource can be listed in the California Register by the State Historical Resources Commission.
 - If a resource is listed in or determined eligible for listing in the National Register of Historic Places (National Register), it is automatically listed in the California Register.
 - If a resource is a California State Historical Landmark, from No. 770 onward, it is automatically listed in the California Register.
- (2) A resource included in a local register of historical resources, as defined in section 5020.1 (k) of the Public Resources Code or identified as significant in an historical

resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

The requirements set forth in PRC 5024.1 (g) for historical resources surveys are: A resource identified as significant in an historical resource survey may be listed in the California Register if the survey meets all of the following criteria:

- The survey has been or will be included in the State Historic Resources Inventory.
- The survey and the survey documentation were prepared in accordance with office [of Historic Preservation] procedures and requirements.
- The resource is evaluated and determined by the office [of Historic Preservation] to have a significance rating of Category 1 to 5 on DPR Form 523.
- If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.

- (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852). The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, is not included in a local register of historical resources (pursuant to section 5020.1 (k) of the Public Resources Code), or is identified in an historical resources survey (meeting the criteria in section 5024.1 (g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1 (j) or 5024.1.

CEQA regulations identify the Secretary of the Interior's Standards as a measure to be used in determinations of whether or not a project of new development or rehabilitation adversely impacts an "historical resource." Section 15064.5(b)(3) states:

"Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource."

Section 15064.5(a)(4) of the CEQA Guidelines states:

"The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1."

The California Environmental Quality Act (CEQA) requires analysis of impacts that may result from project development. These include impacts to listed or potential historic resources. The California Environmental Quality Act (CEQA) mandates that a proposed project's impacts to historic resources be assessed. Historic resources are defined in Public Resource Code as follows:

§5020.1: "Properties listed in, or determined eligible for listing in the California Register of Historical Resources." In order to be eligible for listing a resource must meet one or more of the following criteria to be eligible for listing: A) Is associated with events that have made a significant contribution to the broad patterns of California's History and Cultural Heritage. B) Is associated with the lives of persons important in our past; C) Embodies the distinctive characteristics of type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; and D) Has yielded, or may be likely to yield information important to history or prehistory."

§5021.1(k): Properties included in "local registers of historic resources." According to Section 5021.k local registers include the following: "a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution. Generally, local registers can be defined as either properties designated as landmarks per local ordinances (or resolutions) or properties included in a survey of historical resources that meets the standards of the Office of Historic Preservation (SHPO) for such studies."

The register also includes properties that have formally been listed in the National Register of Historic Resources or determined eligible for listing in the National Register of Historic Places. Properties eligible for listing in the National Register must meet one of the following criteria to be eligible for listing:

- A) are associated with events that have made significant contributions to the broad patterns of our history;
- B) are associated with the lives of persons significant in our past;
- C) embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguished entity whose components may lack individual distinction;
- D) have yielded, or may be likely to yield information important in prehistory or history.

3.0 PEER REVIEW

The 2014 HRR identified three potential historic resources on the property including the main house built in 1918 and two bridges spanning Montecito Creek (Preservation Planning 2014: 2). After identifying the potential resources the report evaluated the potential resources by applying the significance criteria and integrity criteria established by the County of Santa Barbara. An application of the criteria determined the following:

- The HRR concluded that the estate house built in 1918 and a concrete and sandstone bridge (built in circa-1918) spanning Montecito Creek both located on APN 009-640-001 were eligible for listing as significant historic resources at the County level and for listing in the California Register of Historical Resources (CRHR). Because these two resources are eligible for listing as significant historic resources at the local and state level they were determined to be significant historic resources for the purposes of environmental review (Preservation Planning 2014: 12).
- The report determined that another bridge spanning Montecito (built in circa-1918) was not a significant historic resource at the County or state level (Preservation Planning Associates 2014: 12).

The County of Santa Barbara's Cultural Resources Guidelines for evaluating significance of potential historic resources are found in the "County of Santa Barbara Resource Management Department Cultural Resource Guidelines, Historic Resources" (1986; revised 1993). The guidelines define historical significance as follows:

"Significance is a qualitative designation which can be established by analyzing a resource within the contexts discussed in the cultural landscapes model, and by applying the criteria presented in this section."

3.1 Post/Hazeltine Associates Peer Review of the 2014 Historic Resources Study, Historic Resources

Section 1: Introduction (Preservation Planning: pg 1)

Discussion

Because the project is undergoing CEQA review a very brief statement should be made in the introduction indicating the project is undergoing CEQA level review and that the lead agency is the County of Santa Barbara.

Section 2: Project Description (Preservation Planning: pg 1)

Discussion

The project description is adequate to understand the overall scope of the project as it relates to the significant historic resources identified in the report.

Section 3: Setting and Building History (Preservation Planning Associates 2014: 1- 3)

The report provides a historical overview of the Bliss estate from the 19th century to the present.

Discussion

- The HRR provides a sufficient historical overview of the Bliss Estate property to provide a context for the report's subsequent significance analysis of the Bliss estate parcel.
- Less information is provided for the portion of APN 009-640-001 that was historically known as the Gould parcel (located south of the Bliss estate property as stated on page 3 of the HRR). While this parcel was not historically part of Casa Dorinda, a brief overview of its history is required since it is encompassed within the project area evaluated by the MND. This should include a statement regarding history of the existing olive grove located southwest of the main Casa Dorinda Campus. This data is needed to provide sufficient data to substantiate that the portions of the project parcels that were not part of the Bliss estate do not embody potentially significance. Therefore, the report should be amended to include this information.

Section 4: Site and Building Description (Preservation Planning Associates 2014: pgs 3 – 6)

The report provides a description of the surveyed buildings and a brief description of their setting.

Discussion

The House:

- The description of the house provides sufficient information for the subsequent analysis of significance and the evaluation of project impacts.

- One element of the house's immediate setting, the large rectangular lawn set on a raised terrace embellished with a balustrade and urns that extends off the house's south elevation requires a brief description since this element dates to the period of significance and is a character-defining element of the house's immediate setting.

Exit Bridge:

- The description of the exit bridge provides sufficient information for the subsequent analysis of significance and the evaluation of project impacts.

Entrance Bridge:

- The description of the entrance bridge provides sufficient information for the subsequent analysis of significance.

Landscape:

The HRR does not include a description of the existing designed landscape or natural area. While these elements may not be of historic significance, sufficient information regarding the present-day appearance of the project parcels and their appearance during the period of significance must be offered to provide a basis for the subsequent significance evaluation and the analysis of project impacts. These descriptions can be brief, but need to include both the original Bliss estate property as well as other parcels such as the former Gould parcel. The description of the designed landscape should reference an article by Susan Chamberlin, *Landscape Historian*, in: *Eden, the Journal of the California Garden and Landscape History Society, Volume 14, No. 2, Spring 2011*, detailing the history of Casa Dorinda's landscaping, which was designed by the noted landscape designer, Peter Reidel with possible subsequent minor alterations by Beatrix Farrand.

Section 5: Significance Criteria (Preservation Planning Associates: 6 – 8)

This section of the report summarizes CEQA as it applies to Historic Resources.

Discussion

This section appropriately summarizes CEQA as it applies to the project, no comments.

Section 6: Significance Evaluation (Preservation Planning Associates: 8 – 12)

This section of the report applies the integrity, age, association, and significance criteria listed in the "County of Santa Barbara Resource Management Department Cultural Resource Guidelines, Historic Resources" (1986: revised 1993) to the standing buildings within the project area that are more than 50-years-of-age.

Discussion

The House:

- The evaluation of the house provides sufficient data to substantiate the conclusions

regarding the significance of the house. Post/Hazeltine Associates concurs that the house is eligible for listing as a County of Santa Barbara Landmark.

Exit Bridge:

- The evaluation of the exit bridge provides sufficient data to substantiate the conclusions regarding the significance of this structure. Post/Hazeltine Associates concurs that the bridge is eligible for listing as a County of Santa Barbara Place of Historic Merit.

Entrance Bridge:

- The evaluation of the entrance bridge does not fully substantiate the report's conclusion that the bridge does not achieve a comparable level of craftsmanship and design as the exit bridge, which was found eligible for listing as a County of Santa Barbara Place of Historic Merit. Both bridges are comparable in their design, materials and design being constructed of formed concrete faced with sandstone and designed to span channelized sections of Montecito Creek. The differences in design are most likely due, as noted in the report to a desire to subtly differentiate between the main estate drive and a secondary access, rather than the employment of lesser quality construction techniques or methods. This can be seen in the overall quality of the sandstone masonry of both bridges which are dressed to a very similar level of finish while employing a somewhat contrasting coursing and pointing style. Moreover, the HRR determined that the entrance bridge received a ranking of High in five categories which implies the resource is historically if not architecturally significant. Therefore based on the information presented in the report as well as an onsite inspection of this resource by Post/Hazeltine Associates, the entrance bridge would appear, based on the available evidence, to be eligible for listing as a County of Santa Barbara Place of Historic Merit since it embodies the same historical associations, construction techniques and overall level of craftsmanship exhibited by the exit bridge which was determined eligible for listing as a County of Santa Barbara Place of Historic Merit.

Landscape:

The report requires revision to include a section evaluating the potential significance of the designed and natural landscape. While the alterations carried out since 1971, including the construction of a large number of additional buildings to accommodate the transformation of the estate into a retirement community, which has substantially impaired the designed-landscape's integrity of setting, design, materials, and workmanship, the HRR must provide an evaluation of the landscape in order to substantiate a conclusion that a designed or natural landscape, constituting a significant historic resource for the purposes of environmental review does not exist on the property. This is especially important since the designed landscape represented the work of Peter Riedel, one of the region's most noted early 20th century landscape designers. This analysis should also include a brief analysis of the olive grove at the southeast corner of the larger project parcel (located on the former Gould parcel), even though this element of the project would not be directly affected by the proposed project since this element is more than 50 years of age and is visible on aerial photographs taken as early as 1938 and possibly as early as 1928. While the designed

landscape has not retained its integrity of design, the following elements of the designed landscape would appear to make a substantial contribution to the setting of the house:

- The rectangular terrace and its balustrade capped by urns off the south elevation (these features represent part of the designed landscape dating to the period of significance).
- The overall form of the great lawn off the south elevation of the house.

1) The channelized creek with its two bridges and their driveways may also contribute to the setting of the house. If they do not the report should provide a brief analysis supporting this conclusion.

2) It would be appropriate to insert a very brief analysis of the entrance gates in a review of the landscape since they are subsequently reviewed in Section 7 under "Entry Gate on page 16 of the HRR. This should clearly state if the gates are a contributor to the property's historic/architectural significance or if they are not significant for the purposes of environmental review.

Section 7: Potential Adverse Impacts (Preservation Planning Associates: 13 – 16)

This section of the report provides the following analysis of potential project impacts to historic resources:

- A brief summary of the regulatory framework and CEQA as it applies to historic resources in the project area.
- The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.
- A summary of the Santa Barbara County Comprehensive Plan Land Use policies as they apply to significant historical and Archaeological resources.
- A summary of the section of the Montecito Community Plan Update as it applies to Cultural Resources/Archaeology.
- The proposed alterations to the setting of the house were evaluated and determined to meet Standard 9. Therefore, the project would result in a less than significant impact to significant historic resources.
- The proposed demolition of the exit bridge was determined result in a less than significant impact provided the bridge was documented prior to its removal and existing stone veneer and "top stones" (parapet) be reinstalled on the new bridge. New masonry is required to be quarried on-site to match the historic sandstone material.

Discussion

The need for evaluating a project's impacts to historic resources is summarized in Section 21084.1 of the Public Resources Code, which states: "*A project that may cause a substantial change in the significance of a historic resource is a project that may have a significant effect on the environment.*" The report should include a section stating the impact thresholds for the proposed project. The report should also include a section outlining CEQA guidelines, as stated in Section 15064.5 of the PRC as they pertain to the

Casa Dorinda Master Plan Update Project. This section of the report should include an explicit statement stating under which criteria listed in *State CEQA Guidelines Section 5024.1, Title 14 CCR, Section 4850 et seq.* the potential resources are considered to be "historic resources" as defined by CEQA.

The House and its Setting:

The evaluation of the proposed alterations to the immediate setting of the house appropriately applies Standard 9 to this aspect of the project. It would be appropriate to apply Standard 10 to these changes since the construction of the new entrance court which abuts the house's entrance façade, would meet the definition of "related new construction called out in Standard 10. We would like to note that an application of Standard 10 would conclude that the proposed alterations, which would not remove historic hardscape or dramatically alter the setting of the entrance façade and could be removed in the future with no impact to the house's architectural integrity or integrity of setting would meet Standard 10.

The Entry Gate:

The evaluation of the proposed alterations to gates appropriately applies Standard 9 to this aspect of the project.

Exit Bridge:

The conclusion that the impact of the demolition and rebuilding of the exit bridge can be reduced to a less than significant level using the historic sandstone veneer on a new bridge of a somewhat different design could be greatly strengthened if the report concluded that both bridges are components of a significant historic resource which share the same attributes and historical associations. In that case, the proposed project, while removing one component of the resource would leave the other element (the entry bridge) intact, which would provide a sufficient amount of the original building material intact and in-place to convey those characteristics that make the bridges' an exemplar of early 20th century stone masonry and eligible for listing at the local level. Without this adjustment, it is difficult to conclude that the impact of the demolition of the bridge and its rebuilding to a different design using the existing sandstone veneer and new stonework could be reduced to less than significant level.

SUMMARY AND CONCLUSION

Post/Hazeltine Associates reviewed a Historic Resources Report, Historic Resources for the Casa Dorinda Master Plan Update and has concluded the following:

- The historical overview and descriptions as well as the analysis of significance for the house and exit bridge are substantiated.
- The entrance bridge would appear to be eligible for listing as a County of Santa Barbara Place of Historic Merit.
- A brief landscape historical overview and analysis should be added to the document to substantiate a conclusion that a significant designed-landscape or natural landscape does not exist on the project parcels.

- The analysis of project impacts to the setting of the house is through and substantiated with the proviso that Standard 10 be applied.
- The analysis of project impacts to the entry gate is through and substantiated
- The analysis of project impacts to the exit bridge requires further substantiation to strengthen the conclusion that project impacts from the proposed demolition and rebuilding can be reduced to a less than significant level (Class III).

Sources Consulted for the Report

Preservation Planning Associates
2015 Phase I-2 Cultural Resources Study, Historic Resources, 300 Hot Springs Road,
Montecito, California.

Public Agencies

Santa Barbara County

2015 Draft Mitigated Negative Declaration 15NGD-00000-00003, Casa Dorinda Master Plan Update, Case No. 14RVP-00000-00005, February 2, 2015.

1993 County of Santa Barbara, Resource Management Department, Cultural Resource Guidelines, Historic Resources Element (1986, Revised 1993).

1982 County Resource Management Department, Land Use Element of the County of Santa Barbara Comprehensive Plan. Cultural Resources Guidelines: Archaeological, Historical, and Ethnic Elements.

State of California

CEQA guidelines as cited in text.

United States Department of the Interior, National Park Service (NPS)

1983 The Secretary of the Interior's Standards for Archaeology and Historic Preservation. F8 Fed. Reg. (Federal Register) 44716-68.

1992 The Secretary of the Interior's Standards and Guidelines for the Treatment of Historic Properties. Brochure, Preservation Assistance Division, Washington, D.C.

1984 Preservation Briefs 36: Protecting Cultural Landscapes: Planning, Treatment, and Management of Historic Landscapes. Charles A. Birnbaum, ASLA.

1996 The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes. U.S. Department of the Interior, National Park Service, Cultural Resource Stewardship and Partnerships, Heritage Preservation Services, Historic Landscape Initiative. Washington, D.C.

- 1983 Secretary of the Interior's Standards and Guidelines for Federal Agency Historic Preservation Programs under Section 110 of the National Historic Preservation Act. 63 Fed Reg. 20495-20508.
- 1989 National Register Bulletin 30: Guidelines for Evaluating and Documenting Rural Historic Landscapes (Revised 1999).
- 1990 National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation (Revised 1997).

Post/Hazeltine Associates

Architectural Historians
2607 Orella Street
Santa Barbara, CA 93105
Phone: (805) 682-5751
email: posthazeltine@cox.net

December 15, 2015

Re: Response to a Letter from the Pearl Chase Society received by County Staff on December 11, 2015 regarding the Casa Dorinda Conditional Use Update, Montecito, California

Dear Chairperson Brown and fellow Commissioners:

Post/Hazeltine Associates has reviewed the letter and has the following comments:

- With the exception of the forward by Kellam de Forest the letter appears to be the same document that was submitted by the Pearl Chase Society in April of this year.
- The letter states the bridge proposed for demolition was determined eligible for listing as a County Landmark when in fact, Alexandra Cole's report determined it was eligible as a Place of Historic Merit.
- The report prepared by Alexandra Cole (January of 2014 with an update in August of 2014) along with the Peer Review (May of 2015), Addendum Report (August of 2015) and the Letter Report for 352 Hot Springs Road (August 2015) prepared by Post/Hazeltine Associates were all prepared to meet the standards for CEQA level review.
- The Post/Hazeltine Associates Addendum report prepared in August of 2015 included an evaluation of the designed landscape, which unfortunately, due to extensive changes carried out in 1970s, no longer retained its integrity of design or materials and was therefore, not a significant historic resource for the purposes of environmental review. The report included a history of the landscape and a biography of the landscape designer Peter Riedel. The Addendum Report prepared in 2015 did conclude that the rectangular terrace off the south side of the house as well as the vista extending towards the Pacific Ocean were contributors to the house's historic and architectural significance. The August 2015 Addendum Report also concluded that both bridges as well as a portion of the stone-lined concrete channel, were significant resources for the purposes of environmental review. A double row of olive trees on the former Gould property were also found to be a significant resource for the purposes of environmental review.
- Because it no longer retains integrity of design or materials the landscape is not a significant historic cultural landscape for the purposes of environmental review.

- The location of the proposed grill would not impact the current configuration of the south lawn or the setting of the house and would not impair the design integrity or setting of the rectangular terrace located off the south side of the house.
- In summary, we believe the issues raised in the April of 2015 letter from the Pearl Chase Society, which was resubmitted on December 11, 2015, have been adequately addressed in the Peer Review of May 2015, The Addendum Report of August 2015 and the Letter Report for 352 Hot Springs Road prepared in August of 2015.

Sincerely,

A handwritten signature in black ink, appearing to read "Pamela Post". The signature is fluid and cursive, with the first name being more prominent than the last.

Pamela Post, Ph.D.
Senior Partner,
Post/Hazeltine Associates