

Exhibit D

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Phase II Historic Assessment

**For the Carmel River Inn
Located on U.S. Highway 1 at the Carmel Valley Bridge**

**For
Carmel Inn Ventures
PO Box 1796
Carmel Valley, CA 93924**

Prepared By

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Preservation Consultant
310 Lighthouse Ave.
Pacific Grove, CA 93950**

November 10, 2025

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As proposed this Focused Phase II rehabilitation project will be limited to additions to six of the historic cabins, to include new footings (if needed), expanded walls, repair/& reinstall existing historic windows & reroofing one cabin.

INTRODUCTION.

This Focused Phase II Historic Assessment has been prepared on your behalf as part of an application for needed additions to several historic cabins at the Carmel River Inn, in Monterey County. The subject property is located on the West side of U. S. Highway 1 @ Carmel River Bridge, Carmel, CA 93922. The Assessor's Parcel Number is (009-563-005) (see photos, plans & drawings provided).

The subject property is being treated as a Monterey County Historic District, at the local level of significance. As noted in the 2004 Historical and Architectural Evaluation recommendations at least 18 of the cabins present have been recorded as having historic value, and most have undergone some form of rehabilitation over time, most employing the *Secretary of the Interiors Standards for the Treatment of Historic Properties*. (see full historical documentation provided in Appendix I).

Description of Project

The intent of the current owners is to continue rehabilitation for several of the remaining c.1934 cabins by small additions & repairs (if necessary), to include reroofing one cabin, add new footings (if needed), expand some exterior walls to provide for utility upgrades to current code, & minor expansion of interior space, in all, repair/reinstall existing windows, if needed, matching, in kind, the historic features. The cabins in question include numbers (17/43), (18/46), (19/47) (20/49) (21/52) & a laundry room addition to (30-31) (see site plan & individual unit descriptions provided).

Evaluation for Significance

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, did any event important to the region, state or nation occur on the property. Did anyone important 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 ask if the property is likely to yield information significant to the understanding of the areas history.

Eligibility for historic listing of buildings, structures, objects, sites and districts, i.e., rests on the twin factors of historic significance and integrity to be considered for listing in the National Register of Historic Places, the California Register of Historical Resources, and the Monterey County Historic Resource Inventory. Loss of integrity, if sufficiently great, will overwhelm the historic significance a resource may possess and render it ineligible for historic listing. Likewise, a resource can have complete integrity, but if it lacks significance, it must also be considered ineligible. The subject property is one of the oldest remaining visitor accommodating facilities in the Carmel area.

Integrity is measured by the application of seven aspects, defined by the National Register Criteria for Evaluation. They include: Location, the place where the historic property was constructed, or an historic event occurred; Design, the combination of elements that create the form, plan, space, structure, and style of a building; Setting, the physical environment of the historic property; Materials, the physical elements that were combined during a particular period of time and in a particular pattern or configuration to form a historic property; Workmanship, the physical evidence of the crafts of a particular culture or people during any given period in history; Feeling & Association are subjective elements that assess a resources ability to evoke a sense of time and place.

Based on the Secretary of the Interior's Standards, under the treatment for Rehabilitation, the owner proposes to slightly enlarge several of the cabins with board-on-board single-wall expansions on side-elevations to slightly increase interior space for needed utility upgrade, repair/replace the deteriorated wood window framing where needed, matching original features in kind. The proposed work is consistent with U.S. (36 CFR 67), the Treatment for Rehabilitation. "Rehabilitation" is defined as the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values. The work

Historic Integrity

National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation defines historic integrity as "the ability of a property to convey its significance." Historic properties either retain their integrity or they do not.

To maintain integrity, a resource will always retain several and usually most of the seven aspects of integrity.

1. **Location:** the place where the historic property was constructed or the place where the historic event occurred.
2. **Design:** the combination of elements that create the form, plan, space, structure, and style of a property.
3. **Setting:** the physical environment of a historic property.
4. **Materials:** the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
5. **Workmanship:** the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
6. **Feeling:** a property's expression of the aesthetic or historic sense of a particular period of time.
7. **Association:** the direct link between an important historic event or person and a historic property.

National Register Bulletin 15 notes that evaluating historic integrity may be subjective analysis, but is always based on understanding the property's physical features and how they relate to the property's historic significance. The integrity evaluation can begin only after the evaluator establishes the property's significance: *why* it is significant (identifying its area of significance and how it meets the relevant National, State and Local designation criteria), *where* it is important, and *when* the resource is significant (See Appendix I).

Eligibility for historic listing of buildings, structures, objects, sites and districts, i.e., rests on the twin factors of historic significance and integrity to be considered for listing in the National Register of Historic Places, the California Register of Historical Resources, and the Monterey County Historic Resource Inventory. Loss of integrity, if sufficiently great, will overwhelm the historic significance a resource may possess and render it ineligible for historic listing. Likewise, a resource can have complete integrity, but if it lacks significance, it must also be considered ineligible.

The Seven aspects of integrity as applied to the subject project:

Setting: The subject cabins scheduled for rehabilitation are in their original campground landscape settings

Location: The subject cabins remain on their original sites within the campground. 5

Design: Four of the cabins are mirror images of each other, (23 & 26) & (20/21).
All retain at least 80% of their original features, but some window changes.

Workmanship: Similar board & bat wood siding w/attached front gabled carports, & side-gabled comp. roofs, fenestration mix of multi-paned wood & fixed or sliding metal frames, decorative pine pierced shutters, and a combination of plain & bead & reel facias on all cabins in question.

Materials: Changes to the cabins have been chiefly in fenestration over time. Given the 1930s period of construction, and the original materials appear reasonably intact, The cabins have integrity of materials.

Feeling: The uniformity in design, workmanship & materials of the cabins in general maintain a strong sense of time & place as well as historic continuity.

Association: The facility's cabins retain sufficient historic character-defining features to give it and them integrity of association.

IMPACTS OF THE PROPOSED PROJECT

The *Secretary of the Interior's Standards for the Treatment of Historic Properties (standards)* provides the framework for evaluating the impacts of additions and alterations to historic buildings. The *Standards* describe four treatment approaches: preservation, rehabilitation, restoration and reconstruction. The *Standards* require that the treatment approach be determined first, as a different set of *Standards* apply to each approach. For the Carmel River Inn the treatment approach is rehabilitation. The *Standards* describe rehabilitation as:

In **Rehabilitation**, historic building materials and character-defining features are protected and maintained as they are in the treatment for Preservation; however, an assumption is made prior to the work that some existing historic fabric has been somewhat modified or deteriorated over time and, as a result some repair & replacement will be required. Thus, latitude is given in the Guidelines for Rehabilitation to replace deteriorated, damaged, or missing features using either traditional or appropriate substitute materials. Of the four treatments, only Rehabilitation includes an opportunity to make possible an efficient contemporary use through such alterations and additions (see *The Secretary of the interior's Standards for Treatment of Historic Properties* (Washington, D.C.: National Park Service, 2012).

The ten standards for rehabilitation are:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive material, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features, spaces or elements from other historic properties will not be undertaken.
4. Changes to a historic property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner, that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Project Impacts

The proposed project includes minor additions & alterations to each of the cabins identified in Appendix II of this document. The additions will provide for a more efficient contemporary use by slightly expanding some of the existing building envelopes (See the proposed individual cabin updates included in Appendix II). They relate to:

Cabin size modification by replacement of some secondary exterior walls with single wall vertical board on board components, matching in form the originals

Slightly extend the roof overhangs on the single wall extensions, matching the existing historic rafter tails.

Repair/replacement of non-wood windows with new wood windows, matching in kind the original features on the proposed new single walls, with original shutters, if possible. to meet the programmatic needs of the modified interiors.

Move two existing entry doors to new locations on the NW interior corner of the carports on cabins 46 & 49

Design plans and drawings are presented in Appendix A.

As proposed this Focused Phase II rehabilitation project will be limited to additions to six of the historic cabins, to include new footings (if needed), expanded walls, repair/& reinstall existing historic windows & reroofing one cabin.

Mitigation of Project Impacts

As stated above, the proposed treatment plan for the cabins is rehabilitation. The proposed project requires no further mitigation because it follows the *Standards*, as outlined below.

1. *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive material, features, spaces and spatial relationships.*

The cabins are being retained in their original use as resort rooms, with which supports this Standard.

2. *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.*

Based on the character-defining features of the Carmel River Inn in the 2004 Historical and Architectural Evaluation of the Inn, the cabins under review will retain their principal character-defining features of the cabin building envelopes. They will essentially remain the same. The simple utilitarian treatment of the side-elevations assures the prominence of the façades. As proposed, the new single wall additions will minimally change the visual appearance of the altered elevations, and return existing historic wood windows, both original and matching, in kind close to their historic locations, and should satisfy Standard #2.

3. *Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features, spaces or elements from other historic properties will not be undertaken.*

The original cabins have already undergone some window changes over time. As noted in Standard #2, existing & new wood windows, matching those from the original c. 1934 cabins will be employed to bring the asymmetrical fenestration closer to its earlier appearance and should satisfy Standard #3.

4. *Changes to a historic property that have acquired historic significance in their own right will be retained and preserved.*

The changes to the fenestration over time, including the metal and glass sliding types marred the original look of the cabins. The proposed design will, in part, help bring it somewhat closer back to its c. 1934 appearance. Standard #4 is satisfied.

5. *Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

The proposed single wall changes will slightly expand secondary elevations for utility upgrades and more living space, Their board on board design will both generally match, as well as differentiate the old exterior material from the new. The reuse of historic wood window features should satisfy Standard #5.

6. *Deteriorated features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

The proposed project will repair and rehabilitate deteriorated historic features. Replacement, if necessary, will be with in-kind materials. Standard #6 is satisfied

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

The Standard will be satisfied by employing the gentlest means possible when the cabins are repainted.

8. Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

This Standard is not applicable.

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

There will be some minor loss of historic fabric along with the replacement of single wall board on board material on some elevations. The intention is to mitigate this loss by measured Historic American Building Survey (HABS) drawings and /use of (HABS) rectified photography or both. The elevations in question are secondary and some altered.

The proposed addition will be primarily differentiated from the original building through the use of the board-on-board single wall replacements, satisfying Standard

10. New additions and adjacent or related new construction will be undertaken in such a manner, that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The proposed addition can be removed in future and the original building envelope matched through the employment of the measured HABS drawings or the (HABS) rectified photography.

This summary of approved cabin rehabilitation, and continued Focused Phase II rehabilitation of further cabins at the Carmel River Inn, is consistent with *the Secretary of the Interior's Standards for the Rehabilitation of Historic Properties.*

Kent Seavey Qualified Individual

2 messages

CCIC <CCIC@sbnature2.org>

Tue, Nov 5, 2024 at 3:28 PM

To: "gmccown@cityofpacificgrove.org" <gmccown@cityofpacificgrove.org>

Cc: "seaveykent@gmail.com" <seaveykent@gmail.com>

Hello,

I was contacted by Kent Seavey, as our information center is taking over management of the CHRIS Consultants List (chrisinfo.org) since the EIC closure in July. Unfortunately, the transfer of list management credentials did not happen smoothly, so we still cannot edit the website and update the list.

I did want to let you know that Kent Seavey has been on the list in prior years, but had not renewed before EIC's closure. Being on the list does not itself constitute one as being Secretary of Interior Qualified, but we do verify individuals are Qualified prior to accepting them onto the list. In other words, failing to remain on the list does not mean that an individual is no longer Qualified, as their Qualifications are based on their meeting the Standards as outlined in: [The Secretary of the Interior Professional Qualifications Standards Link](#)

In lieu of being able to add Kent to the list at this time, please accept my confirmation that I have reviewed Kent's credentials, and he is indeed a Qualified Individual under the Architectural Historian and Historian criteria, and should be considered qualified for the purposes of evaluating cultural and historical built-environment resources.

If you have any questions about this process, or our role in vetting Qualified Individuals (we also vet their credentials to provide them access to the confidential data within the CHRIS inventory), please contact me at the number below (and alternately at extension 141 if I am not reached at extension 181) M-W or F between 10-4.

Thanks,
Brian

Brian Barbier, M.A.

Coordinator

CENTRAL COAST INFORMATION CENTER

805-682-4711 ext. 181 | www.sbnature.org/collections-research/central-coast-information-center

SANTA BARBARA MUSEUM OF NATURAL HISTORY

Museum

2559 Puesta del Sol, Santa Barbara, CA 93105

805-682-4711 | Fax 805-569-3170

Sea Center

211 Stearns Wharf, Santa Barbara, CA 93101

805-962-2526 | Fax 805-962-3483

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KENT L. SEAVEY, HISTORIC PRESERVATION CONSULTANT BIOGRAPHY

Kent L. Seavey has been an independent historic preservation and museum interpretation consultant since 1978. Prior to establishing his own consulting business, Mr. Seavey worked variously as the first Historical Coordinator for the County of Monterey, Director of the Carmel Museum of Art, Registrar for the M.H. DeYoung Museum, and Curator of the California Historical Society. Mr. Seavey is a well-known authority on California Art and Architecture and has lectured on or taught these subjects at the University of California's Berkeley and Santa Cruz campuses, Cal Poly San Luis Obispo, San Jose State University, Stanford University and other institutions of higher learning.

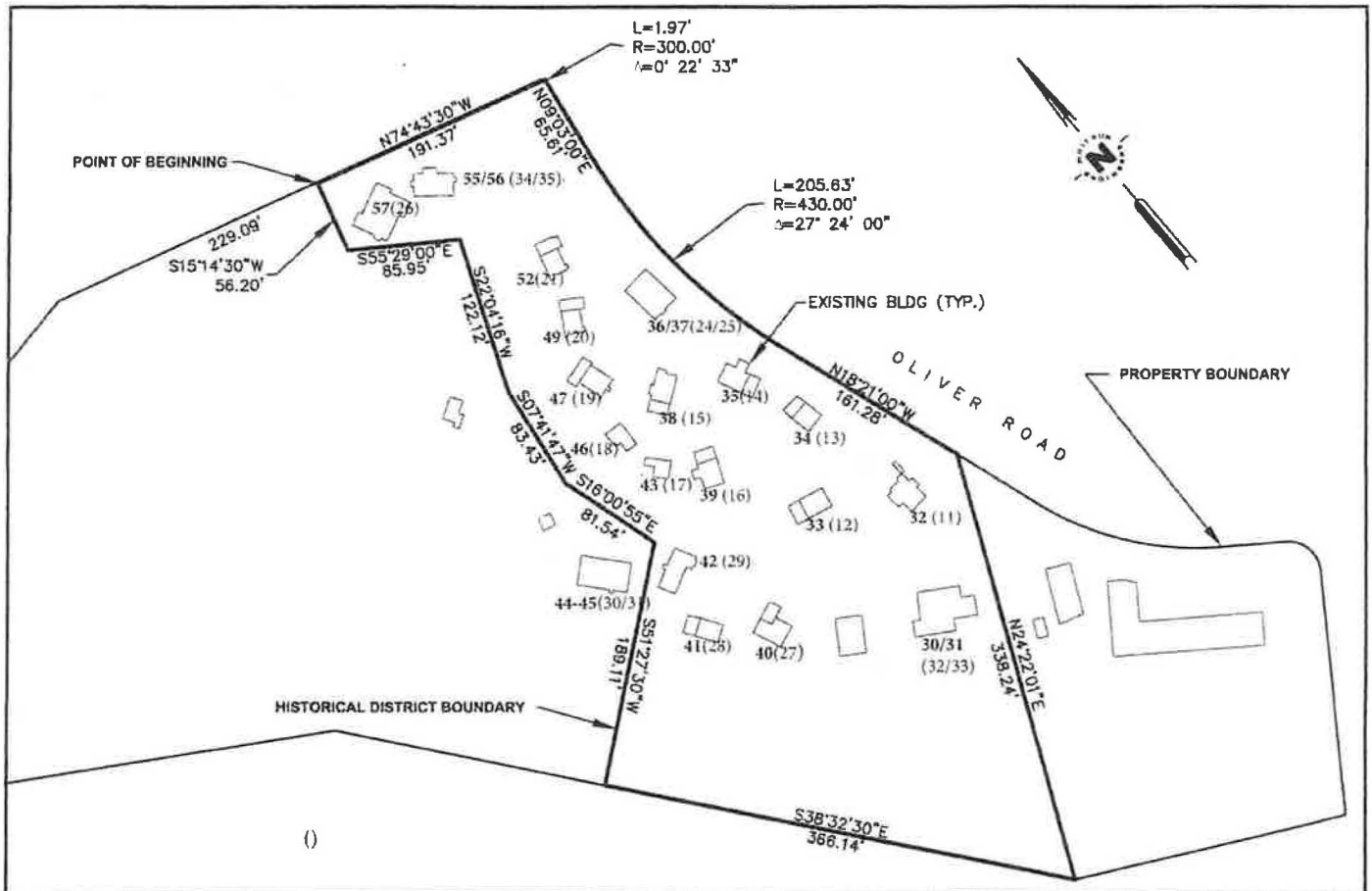
Mr. Seavey has been an instructor at Monterey Peninsula College since 1976, where he teaches art and architectural history and a course on the history of Monterey County. His publications include several monographs on early California artists, including Raymond D. Yelland and Francis McComas. He has also published books on Monterey County historic resources, including *Pacific Grove* (Arcadia Publishing, 2005); and *Carmel, A History in Architecture* (Arcadia Publishing, 2007).

Mr. Seavey has prepared historic resource inventories for numerous California communities, including Cannell-by-the-sea, San Juan Bautista, Salinas, Belmont, San Carlos and Colma. Mr. Seavey has prepared nearly two-thirds of all National Register of Historic Places nominations for Monterey County historic resources. He became an honorary member of the Monterey Bay Chapter of the American Institute of Architects in 2005 and was the recipient of the Robert Stanton Award for contributions to the field of architecture in 2007. Mr. Seavey also wrote preservation protocols for the conference of California Historical Society while chair of their preservation committee.

A leading expert in Monterey County architectural history and history, Mr. Seavey was awarded the Distinguished Historian honor by the California Council for the Promotion of History in 2009. Mr. Seavey meets the Secretary of the Interior's Professional Qualifications Standards in Architectural History and History. He frequently advises owners of historic buildings on architectural designs to meet the *Secretary of the Interior's Treatment for Historic Properties*.

Mr. Seavey recently served on the Monterey County Historic Resources Review Board. Previously, he served as Chairman of the Monterey County Historic Advisory Commission, Chairman of the Pacific Grove Historic Preservation Ordinance Drafting Committee, and Director of the California Council for the Promotion of History. Mr. Seavey was also the 2024 winner of the Monterey County Historical Society award for Preservationist of the Year.

APPENDIX I



CARMEL RIVER INN

MONTEREY

HISTORICAL DISTRICT

CALIFORNIA

DATE:	
SCALE:	1" = 100'
DRAWN:	KP
CHECKED:	KMW
PROJECT No.:	1508.00

SHEET

1

OF 1