

Staff Report and Recommendations Agenda of December 8, 2025, Item 5a

County of Ventura • Resource Management Agency

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I. APPLICANT/PROPERTY OWNER:

Applicant: Charles E. Kluger, AIA
560 N Western Ave., 2nd Floor
Los Angeles, CA 90004

Property Owner: Roman Catholic Archdiocese of Los Angeles
3424 Wilshire Blvd.
Los Angeles, CA 90010

II. REQUEST:

A request for a Certificate of Review for the replacement of all wood-clad windows with aluminum-clad windows at the Santa Clara Elementary School, located at 324 S E Street, Oxnard, CA 93030. The scope of work also includes restriping of the existing teacher parking lot, the installation of a new ADA compliant ramp at the existing teacher parking lot, and the re-painting of the exterior of the existing building. (Case No. CH25-0051).

III. LOCATION AND PROPERTY INFORMATION:

324 S E Street, Oxnard, CA 93030
Assessor's Parcel Number (APN): 202-0-084-040
Historic Designation: undesignated, but potentially eligible historic resource
Common/Historic Name: Santa Clara Elementary School

The subject property contains the Santa Clara Elementary School, built in 1929 as a long, T-shaped, two-story building with a flat roof designed in a Moderne interpretation of Spanish Colonial Revival style.

IV. PROJECT SCOPE:

In early 2025, the property owner began replacing the original wood-clad windows with aluminum-clad windows at the Santa Clara Elementary School without obtaining the necessary building permits. In June 2025, City of Oxnard staff issued a stop work order. After identification of the building as a potential historic resource, Oxnard City staff required the property owner to receive cultural heritage authorization before continuing with work. As a result, some original windows are still in place around the school's auditorium area. Out of 126 estimated windows, about 15 original windows remain.

The proposed scope of work consists of both after-the-fact authorization of windows already replaced at the subject property and authorization to replace all remaining wood-clad windows. According to the applicant, the existing wood-clad windows were

deteriorated and partially inoperable. New windows are intended to address school security concerns and achieve better energy efficiency. The scope of work also includes restriping of the existing teacher parking lot, the installation of a new ADA compliant ramp in the existing teacher parking lot, and the re-painting of the exterior of the existing building. Refer to Exhibit 1 for a site plan and elevations, including photos of the school building, and Exhibit 2 for proposed window product information.

V. SIGNIFICANCE AND BACKGROUND:

The subject property was documented in the *1981 Oxnard - Santa Paula Historic Resources Survey (Phase I Part II)* ("historic survey") prepared by Ms. Judith P. Triem. The school building is shown in Figure 1 with its original windows (since removed). The historic survey describes the development of the neighborhood and subject property as follows:

Subdivided in 1899 by the Colonia Improvement Company as part of original town map, "E" Street, along with "D" Street, represents the earliest residential development remaining in the city with very few alterations. The main focal point of "E" Street is the Santa Clara Church which towers above the school and houses, surrounded by equally tall trees. Early builders were Paul Staples and Thomas H. Carroll. The neighborhood had a combination of working class residents and many early influential citizens living on "E" Street including Judge Charles Blackstock, Charles J. Elliot and Thomas H. Carroll. The house at 435 South E Street, the west side of the 200 block of South E, and the Santa Clara Church and Parochial School are all outstanding examples of structures which would merit National Register listing. The Santa Clara Parochial Elementary School, built in 1929, is a long T-shaped two-story building with a flat roof in a zig-zag Moderne interpretation of Spanish Colonial Revival style. Brick and cement block in various geometric and zig-zag patterns highlight the building. The structure is of lightly plastered brick painted white and accented with colorful Spanish tile on the top edge of the building above the entrance. A stepped tower with a cross on top is found over the entrance.

Figure 1 – Santa Clara Elementary School (looking east), 2016



VI. CULTURAL HERITAGE ORDINANCE ANALYSIS:

The scope of work requires a Certificate of Review from the CHB. Ventura County Cultural Heritage Ordinance (Ordinance) §1372-2 provides that the CHB use *The Secretary of the Interior’s Standards for the Treatment of Historic Properties* (“Secretary’s Standards”) in its evaluation of the property and the proposed scope of work. The Certificate of Review process consists of the provision of voluntary recommendations on the scope of work to better conform to the Secretary’s Standards. CHB staff determined the standards for rehabilitation are appropriate for this request and evaluated the scope of work against the relevant standards below.

Standards	Staff Comments
#1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.	<p>The subject building will continue to be used as an elementary school.</p> <p>Staff determined that this Standard has been met.</p>
#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.	<p>The Secretary’s Standards¹ encourage the retention of historic features that contribute to the interpretation of the significance of a historic property and, when appropriate, repair of materials and limited replacement of deteriorated or missing parts rather than full replacement.</p> <p>It would have been preferable to retain all of the wood-clad windows to assess the feasibility of repairing rather than replacing this key character-defining feature. Based on photographic evidence of those windows still remaining, it is not clear that replacement is a suitable treatment as opposed to retaining and repairing the original windows, including restoring mechanical functionality, repainting muntins, and replacing glazing as needed. Moreover, aluminum-clad windows are not a preferred replacement and do not match the previous windows in terms of design, color, texture, materials, and other visual qualities. This alteration appears to have reduced the historic integrity of the property.</p> <p>Staff determined that this Standard has not been met.</p>

¹ Weeks, Kay D., *The Secretary of the Interior’s Standards for the Treatment of Historic Properties: with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*, U.S. Department of the Interior, National Park Service, revised 2017, pg. 140.

Standards	Staff Comments
#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 or elements from other historic properties, will not be undertaken.	It does not appear that conjectural design features from other historic properties or inappropriate time periods are proposed to be added to the property with the intent of creating a false sense of historical development. Staff determined that this Standard has been met.
#4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.	There do not appear to be changes to the property that have acquired historic significance in their own right. Staff determined that this Standard has been met.
#5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.	The wood-clad windows that were removed were a key character-defining feature of the subject property. This appears to have reduced the historic integrity of the property. Staff determined that this Standard has not been met.
#6. Deteriorated historic 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.	As mentioned previously, it would have been preferable to retain all of the original wood-clad windows to assess the feasibility of repairing rather than replacing this key character-defining feature. Based on photographic evidence, it is not clear that replacement is a suitable treatment as opposed to retaining and repairing the original windows, including restoring mechanical functionality, repainting muntins, and replacing glazing as needed. Moreover, aluminum-clad windows are not a preferred replacement and do not match the previous windows in terms of design, color, texture, materials, and other visual qualities. This alteration appears to have reduced the historic integrity of the property. Staff determined that this Standard has not been met.
#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.	Not Applicable.
#8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.	Not Applicable.

Standards	Staff Comments
<p>#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.</p>	<p>Window replacements, if determined appropriate, shall match the historic in terms of configuration, materials, details, and finish. The aluminum-clad windows are not a preferred replacement and do not match the previous windows in terms of design, color, texture, materials, and other visual qualities. This alteration appears to have reduced the historic integrity of the property.</p> <p>Staff determined that this Standard has not been met.</p>
<p>#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.</p>	<p>Integrity is defined as the ability of a property to convey its historical significance, or the authenticity of a property's historic identity, evidenced by the survival of physical characteristics and materials that existed during the property's historic or pre-historic period of significance. A property would typically possess several (although not necessarily all) of the following seven aspects of integrity, as defined in National Register Bulletin 15, to convey its significance: Location, Design, Setting, Materials, Workmanship, Feeling, and Association.²</p> <p>The window replacements appear to maintain the same opening locations and dimensions as existed historically. Therefore, if replaced or removed in the future, the essential form and integrity of the historic property and its environment would appear to be unimpaired.</p> <p>Based on the above considerations, staff determined that this Standard has been met.</p>

VII. STAFF CONCLUSION:

Based on the above considerations, the scope of work does not appear consistent with the Secretary's Standards. It would have been preferable to retain all of the original wood-clad windows to assess the feasibility of repairing rather than replacing this key character-defining feature. Based on evidence of original windows still remaining, it is not clear that replacement is a suitable treatment as opposed to retaining, repairing, and weatherproofing the windows, including restoring mechanical functionality, repainting muntins, and replacing glazing as needed. Moreover, aluminum-clad windows are not a preferred replacement and do not match the

² Ventura County Ordinance Code, Article 5 of Chapter 3 of Division 1, Section 1363.

previous windows in terms of design, color, texture, materials, and other visual qualities. This alteration appears to have reduced the historic integrity of the property. The remaining scope of work appears consistent with the Secretary's Standards.

Based on the above, CHB staff recommends the CHB adopt the below recommendations related to the scope of work in order to better conform to the Secretary's Standards.

- **Recommendation #1: In-Kind Window Replacement.** The applicant should install new windows to match the historic windows to the extent feasible in terms of configuration, materials, details, and finish in order to be more compatible with the overall historic character of the building. Accordingly, the proposed plans should be revised to replace windows with a similar style and material (wood-clad) of windows to constitute in-kind replacement. In particular, highly visible windows on the primary elevation should be replaced in-kind. If replacement is not feasible, the next preferred treatment would consist of installing simulated divided lights to the new windows to better match the originals in terms of appearance, if feasible.
- **Recommendation #2: Maintain Remaining Original Windows.** The applicant should maintain and rehabilitate the original wood-clad windows still remaining. Rehabilitation as a treatment would allow for repair of chipping paint, damaged wood, and inoperable hardware, and weatherproofing to improve efficiency.
- **Recommendation #3: Ventura County Landmark Designation.** It is recommended that the property owner pursue designation of the property as a Ventura County Landmark. For more information, refer to Section 1370 of the Ventura County Cultural Heritage Ordinance for a description of the range of potential financial incentives available to owners of landmark properties, and Section 1371 for review requirements for future projects.

VIII. PUBLIC COMMENTS:

No public comment regarding this item has been received to date.

IX. RECOMMENDED ACTIONS:

CHB staff recommends the CHB take the following actions regarding the request:

1. **CONDUCT** public hearing, **RECEIVE** oral and written testimony, and **CONSIDER** the Planning Division staff report and all exhibits and attachments hereto; and


2. **REVIEW** and **COMMENT** on the proposed project in accordance with Ordinance §1372 based on the preceding evidence and analysis.

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Exhibits:

Exhibit 1: Site Plan and Elevations

Exhibit 2: Window Cut Sheets