

Phase II Historic Resources Report Bank of A. Levy Building, 143 W. Fifth Street Oxnard, CA

PRELIMINARY REPORT

9 April 2013

Prepared by:



Prepared for:

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County of Ventura
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Item 6a
Exhibit 3 – Historic Resources
Report, April 9, 2013

Executive Summary

This Phase II Historic Resources Report was prepared for the purpose of assisting the County of Ventura in their compliance with the California Environmental Quality Act (CEQA) as it relates to historic resources, in connection with proposed interior alterations to a commercial building located at 143 W. 5th Street, Oxnard. This property is a designated historic landmark. [Figure 1]

The proposed alterations require the issuance of a Certificate of Appropriateness by the Ventura County Cultural Heritage Board. This report assesses the project in accordance with the *Secretary of the Interior's Standards*, and determines the potential for the proposed project to adversely impact historic resources, and recommends the adoption of mitigation measures. **This report should be considered to be preliminary and for purposes of discussion.**

This report was prepared by San Buenaventura Research Associates of Santa Paula, California, Judy Triem, Historian; and Mitch Stone, Preservation Planner, for Barkley Insurance & Risk Management based on a field investigation and evaluation of impacts completed in March and April 2013. The conclusions contained herein represent the professional opinions of San Buenaventura Research Associates, and are based on the factual data available at the time of its preparation, the application of the appropriate local, state and federal regulations, and best professional practices.

Summary of Findings

The property evaluated in this report was designated as a County of Ventura Landmark in 1979 (Landmark No. 56). Consequently, the property is presumed to be a historic resource for purposes of CEQA. The proposed project was found to have a significant adverse impact on a historic resource, which is mitigable to a less than significant level through the implementation of the mitigation measures recommended in this report.

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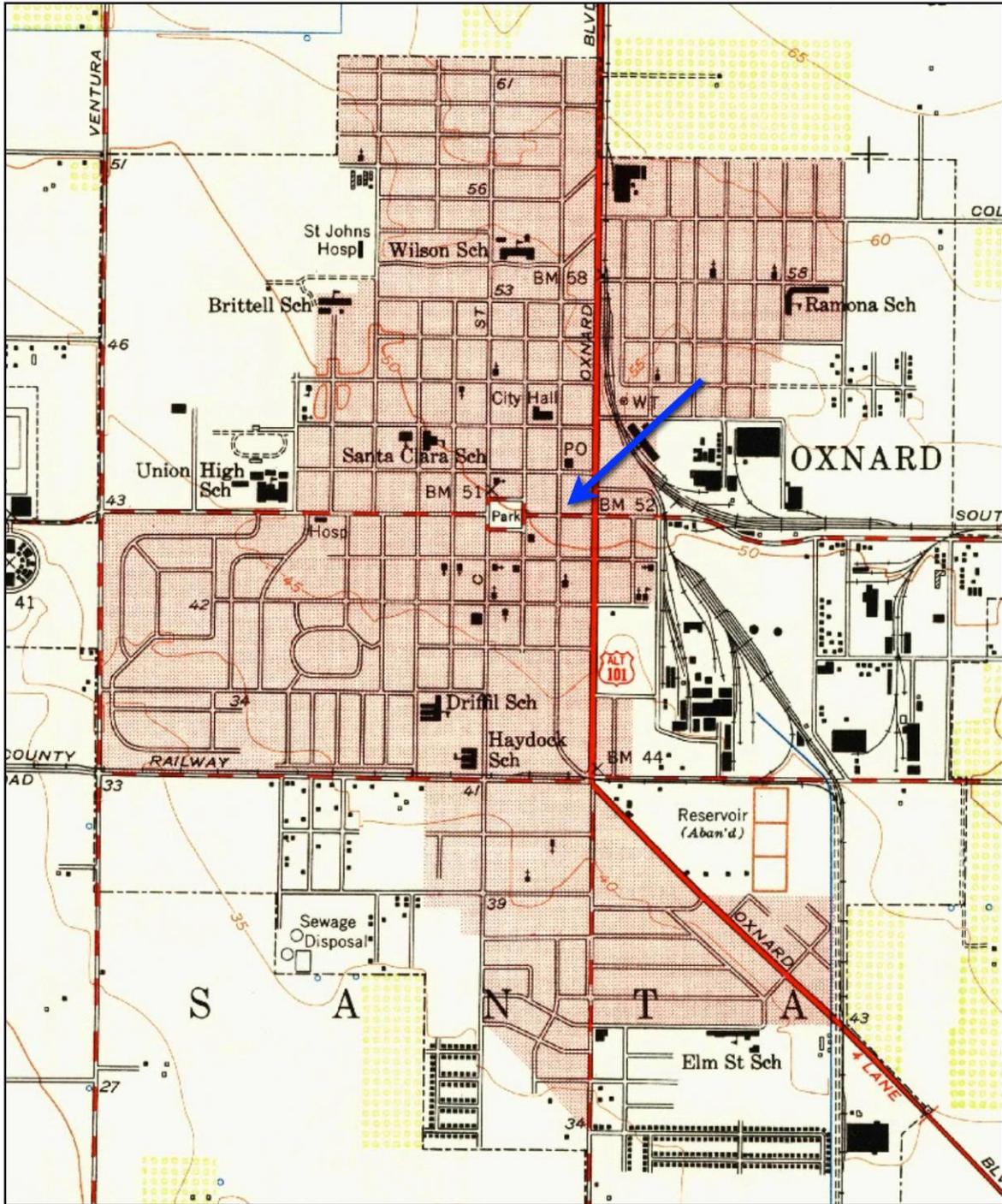


Figure 1. Project Location [Source: USGS 7.5' Quadrangle, Oxnard, CA, 1949]

1. Administrative Setting

The California Environmental Quality Act (CEQA) requires evaluation of project impacts on historic resources, including properties “listed in, or determined eligible for listing in, the California Register of Historical Resources [or] included in a local register of historical resources.” A resource is eligible for listing on the California Register of Historical Resources if it meets any of the criteria for listing, which are:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c))

By definition, the California Register of Historical Resources also includes all “properties formally determined eligible for, or listed in, the National Register of Historic Places,” and certain specified State Historical Landmarks. The majority of “formal determinations” of NRHP eligibility occur when properties are evaluated by the State Office of Historic Preservation in connection with federal environmental review procedures (Section 106 of the National Historic Preservation Act of 1966). Formal determinations of eligibility also occur when properties are nominated to the NRHP, but are not listed due to a lack of owner consent.

The criteria for determining eligibility for listing on the National Register of Historic Places (NRHP) have been developed by the National Park Service. Eligible properties include districts, sites, buildings and structures,

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That 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 distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.

According to the NRHP standards, in order for a property which is found to significant under one or more of the criteria to be considered eligible for listing, the “essential physical features” which define the property’s significance must be present. The standard for determining if a property’s essential physical features exist is known as *integrity*, which is defined as “the ability of a property to convey its significance.” The integrity evaluation is broken down into seven “aspects.”

The seven aspects of integrity are: *Location* (the place where the historic property was constructed or the place where the historic event occurred); *Design* (the combination of elements that create the form, plan, space, structure, and style of a property); *Setting* (the physical environment of a historic property); *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); *Workmanship* (the physical evidence of the crafts of a particular culture or people during any given period of history or prehistory); *Feeling* (a property’s expression of the aesthetic or historic sense of a particular period of time), and; *Association* (the direct link between an important historic event or person and a historic property).

The relevant aspects of integrity depend upon the NRHP criteria applied to a property. For example, a property nominated under Criterion A (events), would be likely to convey its significance primarily through integrity of

location, setting and association. A property nominated solely under Criterion C (design) would usually rely primarily upon integrity of design, materials and workmanship. The California Register regulations include similar language with regard to integrity, but also state that “it is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register.” Further, according to the NRHP guidelines, the integrity of a property must be evaluated at the time the evaluation of eligibility is conducted. Integrity assessments cannot be based on speculation with respect to historic fabric and architectural elements which may exist but are not visible to the evaluator, or on restorations which are theoretically possible but which have not occurred. (CCR §4852 (c))

The minimum age criterion for the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) is 50 years. Properties less than 50 years old may be eligible for listing on the NRHP if they can be regarded as “exceptional,” as defined by the NRHP procedures, or in terms of the CRHR, “if it can be demonstrated that sufficient time has passed to understand its historical importance” (Chapter 11, Title 14, §4842(d)(2))

Historic resources as defined by CEQA also includes properties listed in “local registers” of historic properties. A “local register of historic resources” is broadly defined in §5020.1 (k) of the Public Resources Code, as “a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.” Local registers of historic properties come essentially in two forms: (1) surveys of historic resources conducted by a local agency in accordance with Office of Historic Preservation procedures and standards, adopted by the local agency and maintained as current, and (2) landmarks designated under local ordinances or resolutions. These properties are “presumed to be historically or culturally significant... unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.” (PRC §§ 5024.1, 21804.1, 15064.5)

2. Impact Thresholds and Mitigation

According to the Public Resources Code, “a project that may cause a substantial change in the significance of an historical resource is a project that may have a significant effect on the environment.” The Public Resources Code broadly defines a threshold for determining if the impacts of a project on an historic property will be significant and adverse. By definition, a substantial adverse change means, “demolition, destruction, relocation, or alterations,” such that the significance of an historical resource would be impaired. For purposes of NRHP eligibility, reductions in a property’s integrity (the ability of the property to convey its significance) should be regarded as potentially adverse impacts. (PRC §21084.1, §5020.1(6))

Further, according to the CEQA Guidelines, “an historical resource is materially impaired when a project... [d]emolishes 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 [or] 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.”

The lead agency is responsible for the identification of “potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource.” The specified methodology for determining if impacts are mitigated to less than significant levels are the *Secretary of the Interior’s Standards for the Treat-*

ment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings and the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), publications of the National Park Service. (PRC §15064.5(b)(3-4))

3. Historic Resources

According to the Ventura County Landmark listing summary,

In the 1880s Achille Levy, a native of France, established a commission and forwarding business in Hueneme. He would buy grain and other products from the farmers and charter sailing schooners to take the goods to San Francisco. Gradually he began lending money to the farmers and cashing their checks. When Oxnard was founded in 1898, he moved his business to a wooden building on Fifth Street and in 1902 to a brick building on the northeast corner of B and Fifth streets. In 1905 the business was incorporated as a banking institution, Bank of A. Levy. Achille Levy considered his bank to be an integral part of the community; there were no foreclosures during his lifetime, even during the depression of the 1930s. In 1927, with Achille's son Joe as president, Bank of A. Levy moved to this Renaissance-style building on the corner of A and Fifth streets. Many branches of the Bank of A. Levy were opened, but the headquarters remained on Fifth and A streets for many years. In 1995 the Bank of A. Levy company was sold to First Interstate Bank. (Ventura County Landmarks & Points of Interest, 1995)

Morgan, Walls and Clements

For their new headquarters, the Bank of A. Levy selected one of the most reputable architectural firms in Southern California. By the 1920s Morgan, Walls and Clements was one the longest, continuously-operating architectural firms in the region, known principally as the designers of prominent commercial, industrial, public buildings, and theaters in historical styles. Few architects in the region matched the firm's reputation and experience, particularly where historic revival architecture and large-scale projects were concerned.

For the interiors of the building, the architects retained the services of the Arenz-Warren Company in Los Angeles, the work supervised by Peter Hans Dethloff. The German-born designer appears to have moved to the United States around 1910, after having worked on numerous architectural interior decoration projects in Germany, Russia, Italy and France. He lived for about ten years in Salt Lake City, where he worked primarily as a fine artist, before moving to Los Angeles circa 1920. He was known for his fresco work, of which the interior finishes in the bank building are an example. The number of architectural projects Dethloff completed and how frequently he collaborated with Morgan, Walls and Clements is currently unknown. In any case, the interior treatments of the building were particularly noted at the time of its public unveiling in May 1927. (*Oxnard Daily Courier*, 5-21-1927)

4. Project Description and Impacts

Secretary of the Interior's Standards for Rehabilitation

In reference to mitigating impacts on historic resources, the CEQA Guidelines state:

Where maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of the historical resource will be conducted in a manner consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (1995), Weeks and Grimmer, the project's impact on the historical resource shall generally be considered mitigated below a level of significance and thus is not significant. (PRC §15126.4 (b)(1))

These standards, developed by the National Park Service, represent design guidelines for carrying out historic preservation, restoration and rehabilitation projects. The Secretary's Standards and the supporting literature describe historic preservation principles and techniques, and offers recommended means for carrying them out. Adhering to the Standards is the only method described within CEQA for reducing project impacts on historic resources to less than significant and adverse levels.

The architect for the project developed a narrative project description of the proposed work, reproduced in the subsection below. Our impact discussion comments follow the bulleted items supplied by the architect, where appropriate. Refer also to the attached architectural plans, including the original building floor plan [Figure 2] and the proposed floor plan [Figure 3].

Project Description

A risk management firm is re-locating into the building. The intent is to retain the character defining elements of the 1926 bank interiors while removing recent modifications/additions and non-character defining elements. This will allow for the modern re-use of the building. No exterior modifications are purposed.

Proposed modifications:

Main Banking Hall

- Remove altered back teller work surfaces and partitions. Retain the main stone faced teller line. This will allow room for modern workstations (sized to efficiently function with up to date data and electrical) to be placed against the perimeter walls. An aisle will be placed between the new workstations and the existing teller line providing a contrast between old and new. [Photos 1-9]

Impact Discussion. The countertop elements of the teller cages behind the marble counter areas appear to be non-historic features. Consequently, their removal is consistent with the Secretary's Standards, provided the removal of the non-historic features and the installation of new features is preformed with care to avoid damaging historic features to be retained. See Mitigation Measures: A-1, A-2.

- The existing teller line will be retained; the existing public teller lobby will be re-used as a public waiting area. The stone floor will be retained; partially covered by an area rug to control sound. The rear portion of the existing teller line facing the private workstations will be reconfigured with new cabinets below the teller countertop to support the work function of the office.

Impact Discussion. The countertop elements of the teller cages behind the marble counter areas appear to be non-historic features. Consequently, their removal is consistent with the Secretary's Standards, provided the removal of the non-historic features and the installation of new features is preformed with care to avoid damaging historic features to be retained.

A wood partition and swinging gate attached to the eastern wall and eastern side of the teller cage areas is proposed to be removed. A portion of a partition on the western side of the teller cage area (which presumably originally matched the eastern side but currently only exists partially) is also proposed to be removed. The removal of historic features and finishes is inconsistent with the Secretary's Standards. Ideally, the new uses of for these spaces would be accommodated within the original configuration of the spaces, and the features retained. If these features are to be removed, care should be exercised in their disassembly, they should be properly documented and stored. See Mitigation Measures: A-1, A-2, B.

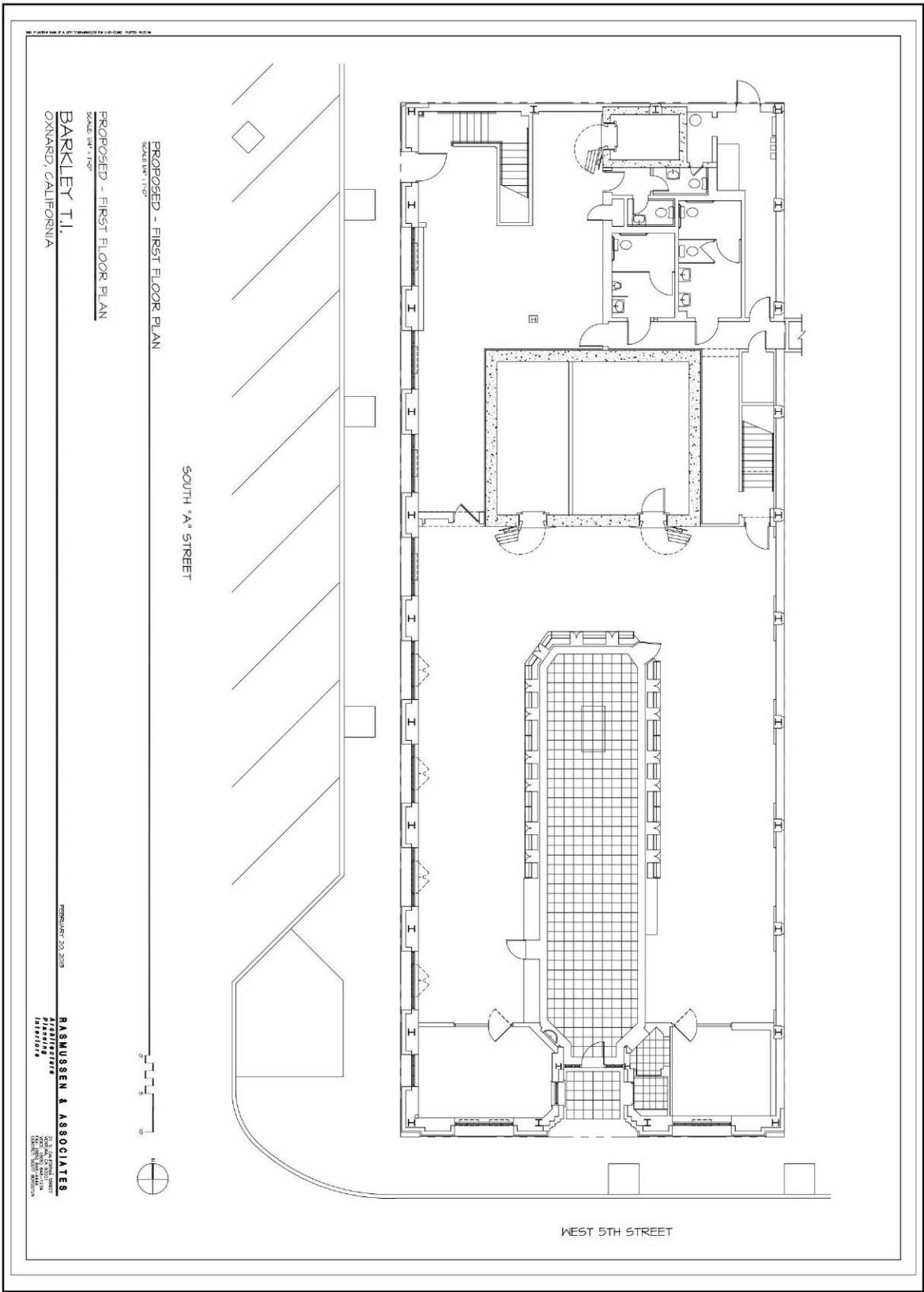


Figure 3. Proposed First Floor Plan [Source: Rasmussen & Associates]

- The existing safety deposit cubicles will be disassembled and stored on-site. This will be done to allow the efficient layout of the new work stations.

Impact Discussion. The safety deposit booths are original features of the building that contribute to defining the function and therefore the historic character of the building. The removal of these features and finishes is inconsistent with the Secretary's Standards. Ideally, new uses would be identified for these spaces and the features retained. If these features are to be removed, care should be exercised in their disassembly, they should be properly documented and stored. See Mitigation Measures: A-2, B.

- The existing two offices off the banking hall have been altered in past re-models. The wall between the two has been removed, one door and frame has been removed and the door opening has been walled in to support a single room conference function. The purposed plan is to remove the door wall in-fill and the remaining existing door and frame. A new glass wall and door will be added in the enlarged opening. The function of the room will continue to be a conference room. The existing door and frame will be saved and stored on-site. [Photos 10, 11]
- The existing women's lounge and toilets have been altered in past re-models. The toilet room walls have been removed, fixtures have been removed and the entry door has been removed and the door opening filled in. A new door was added to the banking hall wall in a past re-model to support an office function. The proposed plan is to remove the door added in a past re-model and enlarge the opening in the existing wall. A new glass wall and door will be added in the enlarged opening to match the conference room entry. The function of the room will continue to be an office.

Impact Discussion. The eastern of the two spaces flanking the entry foyer originally served as the women's lounge, and historically did not communicate directly with the main banking floor as it does today. It is presently unknown when the lounge was converted to office space and the doorway opened to the banking floor. Although historical documentation is currently lacking, it appears that this interior elevation originally featured two blind doorways separated by a narrow pilaster and defined by faux masonry keystones and lintels above both. The existing doorway and blind doorway are proposed to be removed and replaced with a new door and window wall. (Complete details not provided.)

The space to the west of the entry foyer was historically configured as two office spaces with separate doorways to each office onto the banking area. The interior elevation treatment was apparently duplicated to the east side of the entry foyer to provide symmetry. One of these two doorways (eastern) has since been closed with a faux masonry treatment duplicating the finishes in the banking lobby. The existing doorway and panel door, and blind doorway, are proposed to be removed and replaced with a new door and window wall. (Complete details not provided.)

The removal of historic features and finishes is inconsistent with the Secretary's Standards. Ideally, the new uses of for these spaces would be accommodated within the original configuration of the spaces, and the features retained. If these features are to be removed, care should be exercised in their disassembly, they should be properly documented and stored.

The ceilings in the front offices are clearly non-original features. Consequently, their removal and restoration of the original ceilings is consistent with the Secretary's Standards. The original ceiling treatments appear to remain underneath the modern ceilings, although likely damaged by the attachment of later treatments. See Mitigation Measures A-1, A-2, A-3, B.

- The existing customer write-up table will be retained and re-located within the banking hall. This will allow the existing public teller lobby to be re-used as a public waiting area. [Photo 3]

Impact Discussion. The table is of one of two which existed historically. It does not appear to be attached to the floor. Its relocation to elsewhere in the banking hall to accommodate the new use is consistent with the Secretary's Standards.

- A steel stair added in a re-model to the banking hall will be removed. The second floor opening in the wall will be closed and the existing faux stone pattern continued. [Photos 2, 5]

Impact Discussion. The stairway is clearly a non-historic architectural feature (probably 1960s). Consequently, its removal is consistent with the Secretary's Standards. See Mitigation Measure: A-3.

- The pendent lighting (8 fixtures) installed in a recent re-model will be replaced with modern energy efficient fixtures that will also be designed to provide sound absorption. [Photos 1, 2]

Impact Discussion. The existing hanging light fixtures are non-historic features. Consequently, their replacement is consistent with the Secretary's Standards, provided the new fixtures are compatible with the historic architectural character of the building. (Details not provided.) See Mitigation Measure: A-1.

- New electrical and data raceways will be wall mounted above the existing stone base. Wood raceways added during re-models of the hall will be removed to expose the existing stone base.

Impact Discussion. The existing raceways are non-historic features and obscure historic features. Consequently, their replacement as proposed is consistent with the Secretary's Standards, provided the new features are compatible with the historic architectural character of the building. (Details not provided.). See Mitigation Measure: A-1.

- Carpet added during re-models to the hall will be replaced.
- Existing wall and ceiling finishes will be retained.
- HVAC serving the main hall will be retained.
- Broken window glazing will be repaired. The dark tinted window film will be removed. A clear earthquake film will be added to compensate for the lack of tempered glazing. Mesh roller shades will be added to control glare and heat gain (5% opacity).
- Window framing will be repaired where required and cleaned.
- The existing tiled water fountain will be repaired.

Impact Discussion. The removal of non-historic features and the repair of existing historic features is consistent with the Secretary's Standards, provided the removal of the non-historic features is preformed with care to avoid damaging historic features to be retained, and repair is preformed with appropriate materials and finishes. See Mitigation Measures: A-1, A-2, A-3.

Second Floor Mezzanine

- The second floor has been extensively altered and added to over the years. The only character defining elements are the main concrete stair, one profiled doorway and the arched openings and railing into the Main Banking Hall. These elements will be retained.
- The remainder of the second floor will be re-configured into offices, a lounge and a kitchen. Within these spaces existing lay-in ceilings, lighting, paneling, soffits, and paneled ceilings added in recent re-models will be removed. The intent is to have simple painted walls and high hard wall ceilings. Ceiling height will be raised to their original height.
- Flooring added during re-models to the hall will be replaced.
- Lighting added during re-models to the hall will be replaced.
- Electrical and data systems will be re-placed.
- HVAC ducting will be re-configured.
- The existing exterior perimeter brick wall will be exposed in the kitchen area.

Impact Discussion. The spaces within the mezzanine are almost entirely non-historic and appear to have been altered substantially on more than one occasion. Restoring the historic arcade feature is consistent with the Secretary's Standards, provided the restoration is preformed with appropriate materials and finishes. See Mitigation Measures: A-1, A-3.

Summary Discussion for Purposes of CEQA

The following is a discussion of the proposed project activities evaluated in terms of their conformance with the *Secretary's of the Interior's Standards for Rehabilitation*. It should be understood that the *Secretary of the Interior's Standards* are descriptive, not proscriptive in nature. They are intended to provide for a range of design solutions to any given rehabilitation, not to enforce a specific or uniform approach to any given design problem involving historic resources. The Standards are written purposefully to be interpreted both by architects and decision-makers. Accordingly, multiple design solutions can properly be supported by the application of the *Secretary of the Interior's Standards*. The highly interpretative nature of the Standards provides ample grounds for differences of opinion, between professionals who are familiar with their application, and members of the public. Note also that not every standard necessarily applies to every aspect of a project, nor is it necessary to comply with every standard to achieve conformance.

1. *A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.*

Discussion. The historic banking activities associated with the property are no longer present, and the building plan will be rearranged to accommodate the new office use. Consequently the project only partially conforms to the general principle stated in the Secretary's Standards, by which is understood that entirely new uses of historic buildings (often called "adaptive reuse") is a less desirable alternative for historic buildings than the continuation of its historic uses, which tend to minimize the degree to which alterations will be required.

2. *The historic character of a property shall be retained and preserved. The removal of historic materials or alterations of features and spaces that characterize a property shall be avoided.*

Discussion. The proposed alterations will result in some interior historic building fabric loss and the re-configuration of both historic and non-historic spaces. The Secretary's Standards encourage the retention of historic features that contribute to the interpretation of the significance of a historic property. Interior features that have already been significantly altered in use and configuration should be regarded as having no character-defining qualities. However some features that reflect original spatial elements and contribute to the interpretation of the property's historic design and use will be altered or removed, particularly within the safety deposit box area. The alteration or removal of these features does not conform with the Secretary's Standards admonition against the removal of historic features and spaces that characterize a property.

3. *Each property shall 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 architectural elements from other buildings, shall not be undertaken.*

Discussion. In general, it does not appear that conjectural design features are proposed to be added to the historic property.

4. *Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.*

Discussion. All decisions to add, remove or restore architectural features of a historic property should be based on a predetermined historic period of significance for the property. In general, activities that remove features that may not be original but have acquired significance should be regarded as consistent with this provision of the Secretary's Standards. A period of significance for this building has not been formally established, but should probably date to the building's completion in 1927. It is apparent that both the internal plan and features of the building on the banking floor are largely intact, but have been altered considerably on the mezzanine level.

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

Discussion. As in Standard 4, above, alterations to the property should be based on the historic period of significance, such that the specific distinctive features can be preserved. To the extent these features will be retained where feasible, and appropriately preserved, restored, or replaced, this activity conforms to the Secretary's Standards.

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

Discussion. For the most part, the implementation of this measure will by necessity occur as the need arises during construction, and should be regarded as a general condition of approval.

7. *Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures shall be undertaken.*

This Standard is not applicable to this project.

8. *Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.*

This Standard is not applicable to this project.

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

Discussion. No exterior alterations are proposed.

10. *New additions and adjacent or related new construction shall 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.*

Discussion. To the greatest extent feasible, alterations to historic buildings to accommodate new uses should be reversible. Some of the proposed alterations, such as the removal of the safety deposit area booths, and the elimination of door openings, are effectively non-reversible and consequently inconsistent with this Standard. Additionally, in general, alterations to historic fabric should be documented with photographs and measured drawings, as appropriate.

Summary Conclusion

This project as currently represented does not fully conform with the *Secretary of the Interior's Standards*, in particular standards 2 and 10.

5. Mitigation Measures and Residual Impacts

A principle of environmental impact mitigation is that some measure or combination of measures may, if incorporated into a project, serve to avoid or reduce significant and adverse impacts to a historic resource.

The demolition of a historic property cannot be seen as conforming with the *Secretary of the Interior's Standards*. Therefore, the absolute loss of a historic property should generally be regarded as an adverse environmental impact which cannot be mitigated to a less than significant and adverse level. Further, the usefulness of documentation of a historic resource, through photographs and measured drawings, as mitigation for its demolition, is limited by the CEQA Guidelines, which state:

In some circumstances, documentation of an historical resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur. (CEQA Guidelines §15126.4 (b)(2))

Implied by this language is the existence of circumstances whereby documentation may mitigate the impact of demolition to a less than significant level. However, the conditions under which this might be said to have

occurred are not described in the Guidelines. It is also noteworthy that the existing CEQA case law does not appear to support the concept that the loss of a historic resource can be mitigated to less than adverse impact levels by means of documentation or commemoration. (*League for Protection of Oakland's Architectural and Historic Resources v. City of Oakland* [1997] 52 Cal. App. 4th 896; *Architectural Heritage Association v. County of Monterey* [2004] 19 Cal. Rptr. 3d 469)

Taken in their totality, the CEQA Guidelines require a project which will have potentially adverse impacts on historic resources to conform to the *Secretary of the Interior's Standards*, in order for the impacts to be mitigated to below significant and adverse levels. However, CEQA also mandates the adoption of feasible mitigation measures which will reduce adverse impacts, even if the residual impacts after mitigation remain significant. Means other than the application of the Standards would necessarily be required to achieve this level of mitigation. In determining what type of additional mitigation measures would reduce impacts to the greatest extent feasible, best professional practice dictates considering the level of eligibility of the property, as well as by what means it derives its significance.

Mitigation programs for impacts on historic resources tend to fall into three broad categories: documentation, design and interpretation. Documentation techniques involve the recordation of the site according to accepted professional standards, such that the data will be available to future researchers, or for future restoration efforts. Design measures could potentially include direct or indirect architectural references to a lost historic property, e.g., the incorporation of historic artifacts, into the new development, or the relocation of the historic property to another suitable site. Interpretative measures could include commemorating a significant historic event or the property's connection to historically significant themes.

Discussion

This property is a designated Ventura County Landmark, and it derives its significance from its historical and architectural importance. The proposed project will result in alterations to the building's interior design. Therefore, a mitigation program should emphasize design, interpretive and documentation measures.

The following measures should to be incorporated into the mitigation program for this project:

A. Design

1. The applicant shall engage a preservation consultant meeting the *Secretary of the Interior's Professional Qualifications Standards* in Architectural History or Historic Architecture to review design development drawings and construction documents. The preservation consultant shall participate in design collaboration with the project architect as needed to ensure plans conform with the Secretary's Standards and shall prepare a report evaluating plans for conformance with the Secretary's Standards. The report shall be reviewed and approved by the County of Ventura prior to the issuance of building permits for the proposed project.
2. Historic fabric shall be retained and removed only when absolutely necessary to accommodate a new use. Otherwise, historic features should be retained in situ and protected from damage as needed. Repairs to historic fabric shall conform to the *Secretary of the Interior's Standards*, and utilize historically appropriate materials and finishes. New features shall be compatible with the massing, size and scale of historic features.

3. The restoration or replication of historic features and elevations, where proposed, shall be based on documentary evidence of the original design of these features.

B. Documentation

Prior to the alteration of significant interior or exterior features, the applicant shall, in consultation with a qualified historic preservation professional, produce a documentation survey of those features. This documentation shall include high resolution photographs of the significant features or elevations to be altered. The documentation package shall be archived at an appropriate location determined by the County of Ventura.

C. Interpretation

In consultation with a qualified historic preservation professional, the applicant shall produce an interpretive plan for the property for display in a permanent, publicly accessible site or sites. Displayed materials may include photographs (current and historic) and written materials describing and interpreting the historical and architectural themes associated with the property.

D. General Provisions

A qualified historic resources professional shall be present on-site during demolition and construction activities to ensure the preservation of historic interior and exterior building elements.

Impact After Mitigation: Adverse, but less than significant.

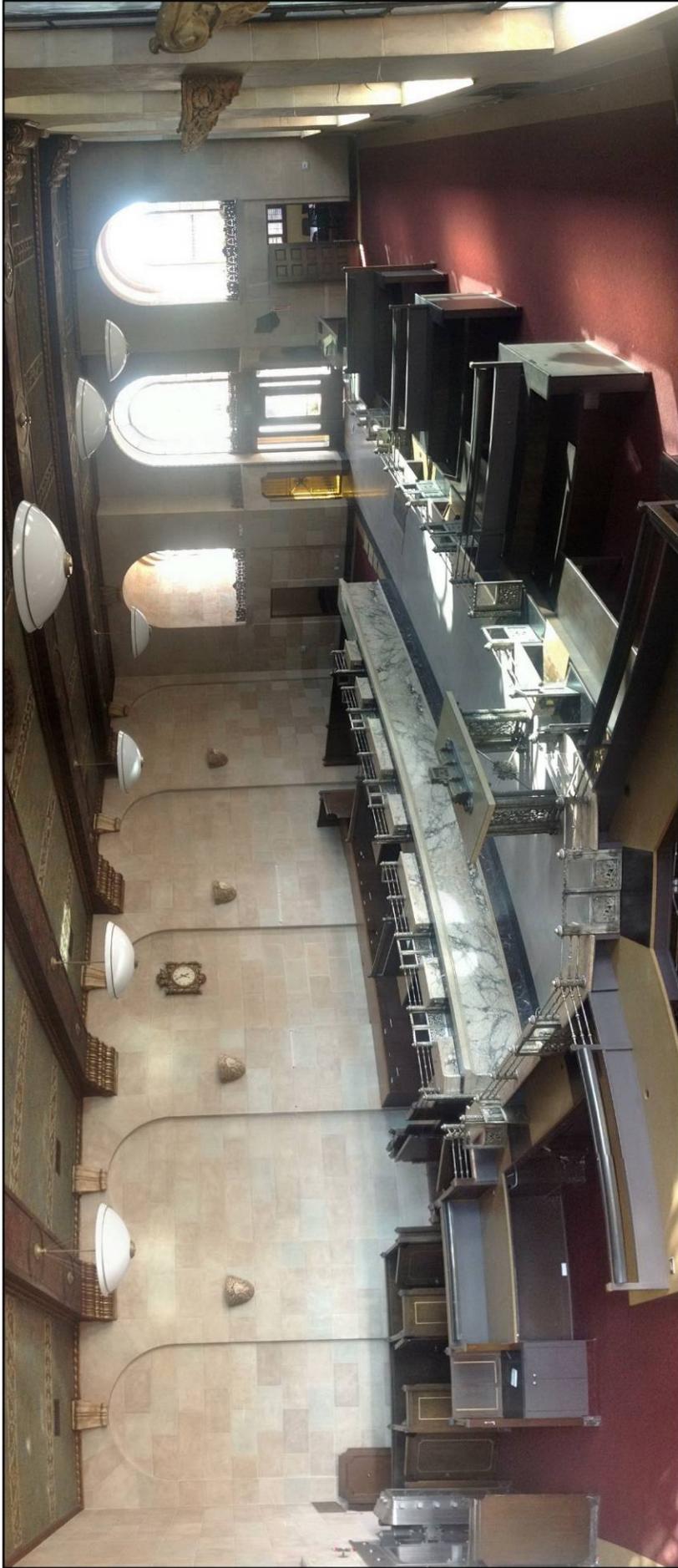


Photo 1. Panorama of banking lobby from northwestern corner. [3-4-2013]

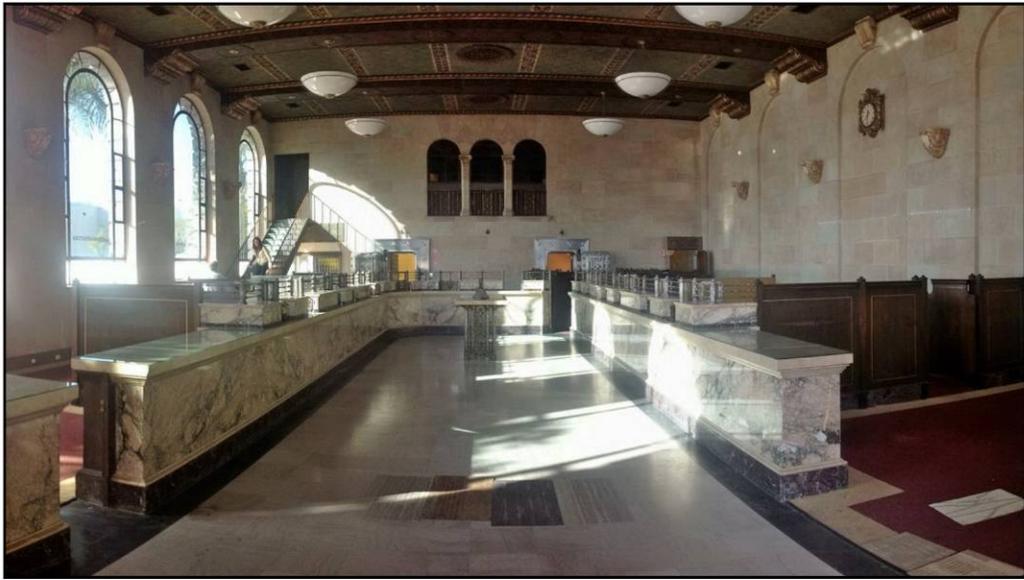


Photo 2. Banking floor, facing north. [3-4-2013]

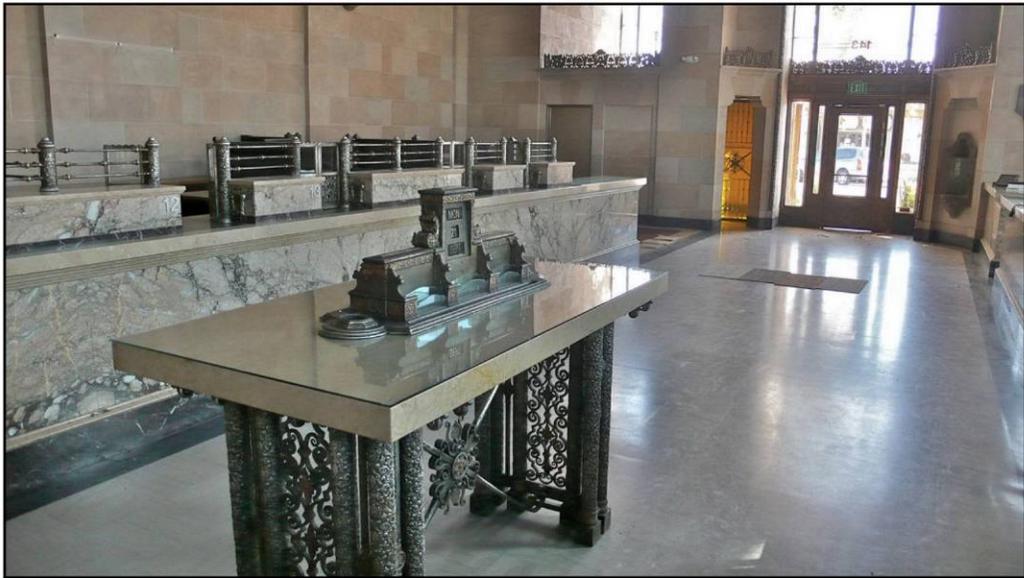


Photo 3. Banking floor, facing southeast. [3-4-2013]

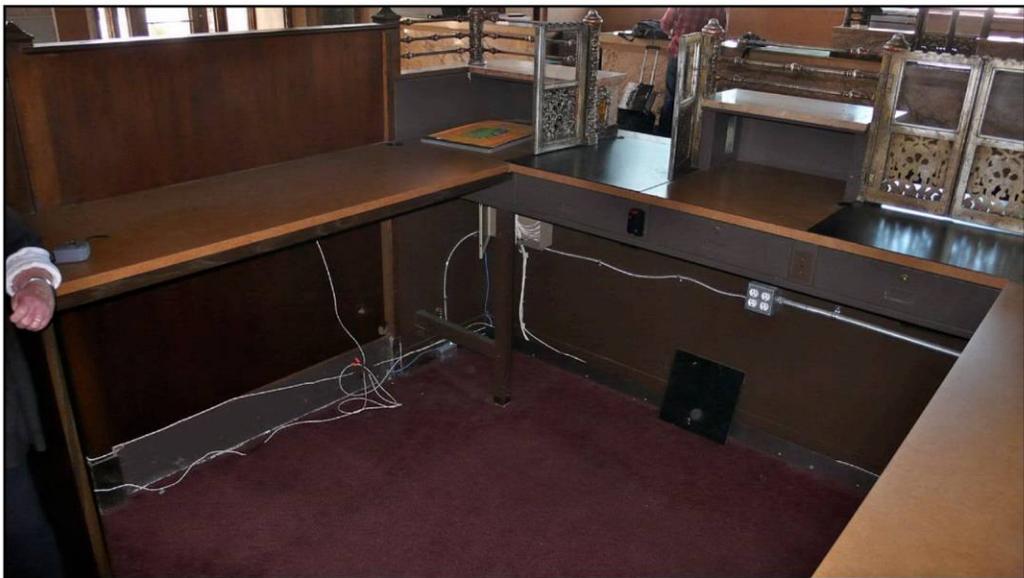


Photo 4. Modern countertops behind teller cages. [3-4-2013]

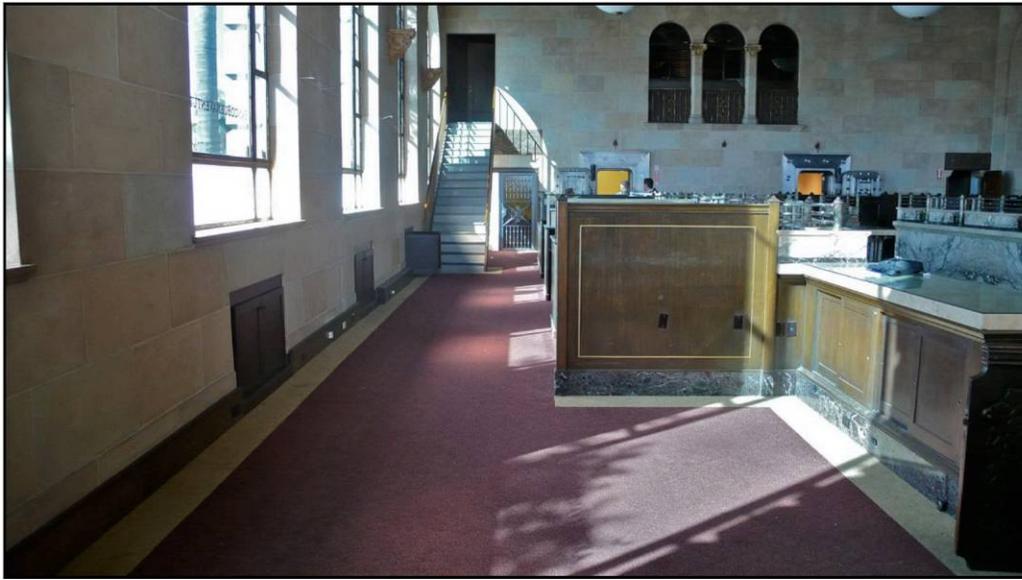


Photo 5. Behind teller cages, west side, facing north, showing wood partition to be removed. [3-4-2013]



Photo 6. Behind teller cages, east side, showing partition and swinging gate to be removed. [3-4-2013]



Photo 7. Safety deposit box booths to be removed. [3-4-2013]



Photo 8. Partition near vault to be removed. [3-4-2013]



Photo 9. Partitions near safety deposit booth and vault area to be removed. [3-4-2013]



Photo 10. Office doorway, west side of entry foyer. [3-4-2013]



Photo 11. Office doorway, east side of entry foyer. [3-4-2013]