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Members of the Cultural Heritage Board, et al:

Vianey Lopez, et al: Please make sure to read the addendum at the end on my concerns about the program and Board Member, Gary Blum.

First I want to open with this because I don't think it's widely known.

I knew that the Mills Act involved a long-term commitment. I did not realize until researching this application **just how severe the financial consequences of cancellation could be, or how disconnected the penalty can be from the actual tax benefit received.** I have to wonder how many members of the Board fully understand this provision—and, more importantly, how clearly it is explained to homeowners before they enter into these contracts.

A Mills Act contract is not simply a ten-year agreement that expires after ten years. It automatically renews each year by adding another year to the end of the term unless a notice of nonrenewal is given. If an owner gives notice of nonrenewal, the contract remains in effect for the balance of the remaining term, even for someone who might buy their house from them, which could be a make or break difference for an already-hard-to-sell house like mine.

More strikingly, if the City cancels the agreement for breach, deterioration, or failure to perform the required rehabilitation, the cancellation fee is **12.5% of the property's current fair-market value at the time of cancellation** — not 12.5% of the tax savings received and not 12.5% of the owner's original purchase price.

	160 South G Street	<u>My Property</u>
Current estimated fair-market value	\$913,000	\$1,900,000
12.5% cancellation fee	\$114,125	\$237,500

Difference in potential cancellation penalty: \$123,375.

This even thought the 1 year tax savings difference between the two properties is only about \$3182.

160 S. G.: \$5,085.60 annual savings

My property: \$8,268 annual savings

In other words, two Mills Act properties directly across the street from one another could be subject to the same preservation program and the same percentage-based tax incentive, yet the owner of the more valuable property could face a cancellation penalty **\$123,375 greater solely because of the property's market value.** The penalty bears no relationship to the amount of Mills Act tax savings the owner actually received.

WHY would anyone take such a risk for so little savings and the hassle of the County violating your home every year for 10 years judging your efforts at your own cost????

Now, as for the Mills Act Application for 160 South G

I live directly across the street from 160 South G Street at the Henry Levy House, 155 South G Street. After reviewing the staff report, proposed Mills Act contract, historic-district documentation, and historical records concerning this property, I am asking the Board **not to recommend approval of this Mills Act contract in its present form.** I'm not sure that the applicants are fully aware of all the repercussions of such a contract.



My concern is not with historic preservation or with my neighbors personally. My concern is that the proposed contract appears to be based upon a historical record that is demonstrably inaccurate, a character-defining-features inventory that contains unexplained inconsistencies, and a Ten-Year Rehabilitation Plan that does not appear to be supported by a meaningful assessment of the property as it actually exists today. **The Cultural Heritage Board (Dillan Murray) is notorious for relying on an outdated and inaccurate document from 1999 (while he charges Oxnard by the hour for his services), used to create the Henry T. Oxnard Historic District, most of which should simply be discarded or corrected once and for all for the record. It was created in a time when they didn't have the internet for research and the folks that created the Historic District (threw it together with mostly hearsay evidence) so as to create their own little "country club" of sorts, only including 2 specific streets while excluding several others. I have long felt that the Historic District designation as it stands now should be removed due to the intent and misleading information by the original people that put it together. Much more accurate information can be found on my website at: <https://henrylevyhouse.com/historic-district-houses/>**

160 S. G Street is a cute little house, but it's not dissimilar to a million other stucco houses in Southern California and in Oxnard in particular. None of the examples below are considered "historic" or "architecturally significant," but are very similar in their architectural style.



The existing interior alterations of the house in question also make the lack of a meaningful condition assessment more important. Photographs taken by the Cultural Heritage Board show that the interior has already been substantially influenced by the owner's personal design aesthetic, including high-gloss black finishes and other strongly modern decorative choices in the living room and dining room. The issue is not the owner's personal taste, I personally think she's cool. The issue is that those choices demonstrate that the house is already being interpreted through a contemporary and niche design style rather than through its documented historic character. That makes it especially important for the City to establish, before approving a ten-year Mills Act contract, which interior materials and features are historic, which have already been altered, which alterations are considered compatible, and what standards will govern future work. Without that baseline, there is no meaningful way to determine whether future changes are preserving the historic character of the house or gradually replacing it with a different aesthetic.

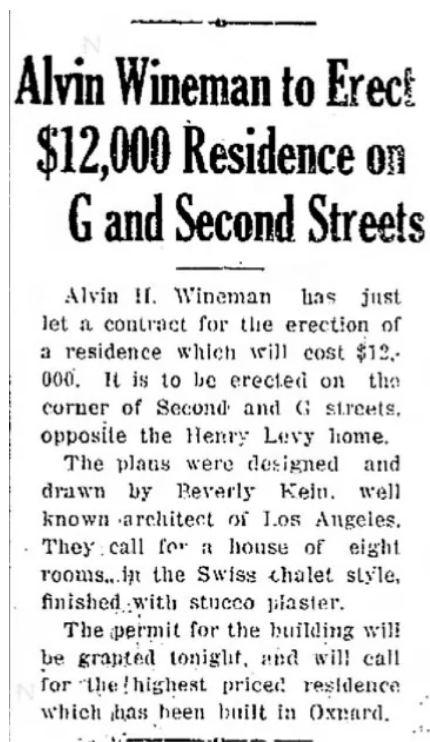
Even though I don't mind the current owner's choices (to each their own), knowing the prior owner, an elderly, conservative Norwegian, she'd be furious at the contemporary changes being made to a house she owned for over 50 years. **The current owners bought a supposedly historic house, not an everyday house in an everyday neighborhood and I personally think they should be respectful of that. If they wanted gothic black rooms, they could have bought anywhere else in Oxnard outside of the historic districts 2 streets.**

The historical foundation of the application is materially inaccurate

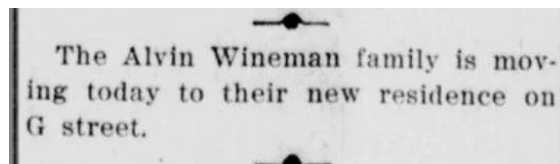
The staff report identifies the property as the “**William C. Craddock House**,” describes it as having been constructed around 1924 *for* William C. Craddock, and characterizes it as French Eclectic/French Provincial Revival. Staff acknowledges that this information comes from the historic survey (attached). This house can be found on my website here: <https://henrylevyhouse.com/160-s-g/>

Newspaper records tell a materially different story.

In 1922, **Alvin H. Wineman** contracted for construction of a residence at the corner of Second and G Streets, directly opposite the Henry Levy residence. The newspaper identified Los Angeles architect Beverly Keim (who was known mostly for designing commercial buildings in L.A.) as the architect and described the house as an eight-room residence in the “**Swiss chalet style, finished with stucco plaster.**” **By August 31, 1922, the newspaper reported that the Wineman family was moving into its new G Street residence. NOT William C. Craddock.**



Oxnard Daily Courier 4/11/1922

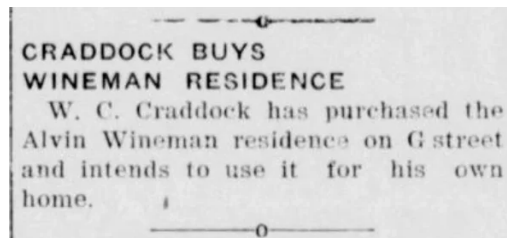


The Alvin Wineman family is moving today to their new residence on G street.

Oxnard Daily Courier 8/31/1922

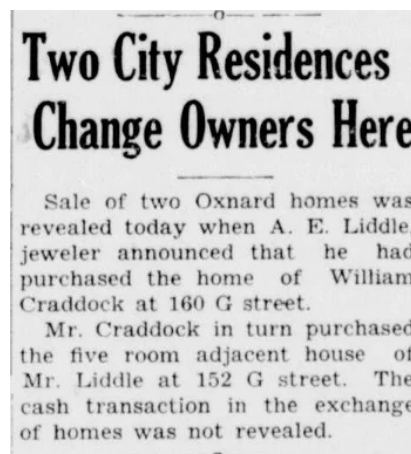
Note: It is also noteworthy that the 1999 National Register documentation expressly identifies another property within the district as "Swiss Chalet," (329 S. G Street) demonstrating that the surveyors recognized and used that architectural classification. The contemporaneous 1922 description of 160 South G Street as being designed in the "Swiss chalet style" therefore should not simply be disregarded in favor of the later "Provincial" classification without explaining the basis for that change.

On August 17, 1925, another article specifically reported "**Craddock Buys Wineman Residence**," documenting William C. Craddock's purchase of the house approximately **three years after it was constructed**. Subsequent newspaper reports document Craddock selling 160 G Street to A. E. Liddle in 1933 and Liddle selling it to Ray D. Snively in 1937.



**CRADDOCK BUYS
WINEMAN RESIDENCE**
W. C. Craddock has purchased the Alvin Wineman residence on G street and intends to use it for his own home.

Oxnard Daily Courier 8/17/1925}



**Two City Residences
Change Owners Here**
Sale of two Oxnard homes was revealed today when A. E. Liddle, jeweler announced that he had purchased the home of William Craddock at 160 G street.
Mr. Craddock in turn purchased the five room adjacent house of Mr. Liddle at 152 G street. The cash transaction in the exchange of homes was not revealed.

Oxnard Daily Courier 7/15/1933



Oxnard Daily Courier 2/08/1937

Therefore, absent contrary primary-source evidence, the historical account underlying this application **appears to contain several fundamental errors:**

- **William C. Craddock was NOT the original commissioning owner;**
- **the house was constructed and occupied in 1922, NOT around 1924;**
- **the documented architect, Beverly Keim, is omitted;**
- **and the architectural description of "Swiss chalet style" CONFLICTS with the later Provincial/French Provincial classification.**

These are not inconsequential details. The proposed contract identifies a historic property, **defines its character-defining features**, and creates continuing preservation obligations based upon that historical identity. **The CHB is supposed to be the authority with expertise to figure these things out and seems to get things wrong quite a lot.**

The problem also appears broader than this one entry. The inaccurate historical account appears to have originated in the 1981 historic resources survey and was then carried forward into the 1999 National Register nomination and, ultimately, **the Cultural Heritage board copy and pasted it into the present Mills Act staff report and contract without verifying it was even accurate.** I

I have also found documentation for another prominent G Street residence that describes it when built as an **"Italian villa blended with a Southern California bungalow,"** while the later 1999 Survey documentation **that CHB relies on,** classifies the same house as "Prairie style." This does not mean that every retrospective architectural classification is necessarily wrong, but it demonstrates why the decades-old survey should not be treated as unquestionable historical fact when primary sources are available. **Tricia Maier and Dillan Murray have known about my website for several years now.**

The staff report goes even further, repeating the 1981 survey's statement that, within the 100 block North through the 400 block South of G Street, the property is **"one of the most outstanding examples of architectural design on the corridor."** That is an extraordinarily strong statement of architectural significance (and horrifyingly incorrect), yet the staff report provides no current comparative analysis supporting it. **More importantly, the statement was cut and pasted by staff from the same 1981 survey whose basic historical account of this particular property now appears to contain multiple material errors.** Before relying upon a forty-five-year-old characterization that this is one of the corridor's "most outstanding" architectural examples, the City should establish what criteria were used to reach that conclusion and whether the conclusion remains supportable in light of the newly documented history of the property.

*NOTE: The description of the district as having "alleys with rear parking" also appears to overgeneralize existing conditions. The alleys provide rear access to some houses have rear garages, but that is not the same as saying the alleys themselves are characterized by "rear parking." Parking in the alley is illegal, and rear parking is not a uniform feature of every property. **This is another example of broad descriptive language from the older survey being copy and pasted without careful qualification.***

The newly discovered information does not cure the application; it underscores how **unreliable the historical record supporting it is.** The City identifies the property by the wrong original owner, the wrong construction date, omits the documented architect, and uses an architectural classification that conflicts with the newspaper descriptions. Those are not minor errors. They go directly to the property's claimed historic significance and to the character-defining features the proposed Mills Act contract would obligate the public to subsidize and the owner to preserve. **This in a 27 year old Historic Landmark area that the City and County seem to care little about and refuse to keep accurate and maintained.**

NOT ONE historic property owner gets any help from the City of Oxnard in any way.

The Board should not attempt to reconstruct and reevaluate the property's significance on the fly at the approval stage. **The application should be returned for a complete, independently documented historical assessment before any Mills Act contract is considered. And Dillan Murray's time should be docked for providing this inaccurate staff report in the first place.**

The staff report contains little meaningful assessment of the property's present condition

The staff report states that County staff visited the property on June 16, 2026 and made recommendations that were incorporated into the Ten-Year Rehabilitation

Plan. **Yet the report does NOT identify what staff actually observed, what deterioration was found, what non-historic alterations were identified, what original materials remain, what restoration opportunities were considered, or why the particular projects in the rehabilitation plan were selected.**

Instead, staff simply concludes that only “minor alterations” have occurred and that the property retains integrity of location, design, materials, workmanship, feeling, and association. **The report does not identify those alterations or explain the factual basis for that conclusion. They apparently want the Board and City Council to just rubber stamp their approval.** A black and white checkerboard kitchen floor, while not unheard of in 1922, was very likely not used in a conservative Swiss Chalet house, but we’re to believe that the staff considers that a minor alteration. Did they find out if the original floor was removed first and destroyed or can the floor be returned to the original state?

That is particularly troubling because the staff report itself states that the owners are agreeing to **“restore, repair, maintain, and protect”** the property and that the Ten-Year Rehabilitation Plan is intended to restore, rehabilitate, and maintain its character-defining elements. Much of what they’ve done so far is to replace, not restore.

Without a documented existing-condition assessment identifying historic materials, later alterations, nonhistoric replacements, deterioration, and reasonable restoration opportunities, **it is difficult to understand how staff determined that this particular Ten-Year Rehabilitation Plan fulfills the purpose of the Mills Act program.**

The roof description requires substantial clarification

The roof description in Exhibit B also appears to require verification against the historical record. Exhibit B states that the roof is clad in “flat concrete shingle tiles, shaped and patterned to resemble slate.” However, an early historic photograph of the property does not clearly show a concrete-tile roof and instead appears to show a much more uniform shingle surface. I am attaching that photograph for the Board’s review. I do not claim that the photograph alone establishes the original roofing material, but it does raise another reason why the current description should be independently verified before it is incorporated into a recorded Mills Act contract.

The roof is particularly concerning because **Exhibit B specifically identifies flat concrete tiles**, shaped and patterned to resemble slate, as part of the house’s historic character and material integrity. **I could be wrong, but the roof currently appears to be ordinary composition shingles (see photo below).** Indeed, the staff report’s own description of the 2026 photograph refers to a “dark shingled roof.”



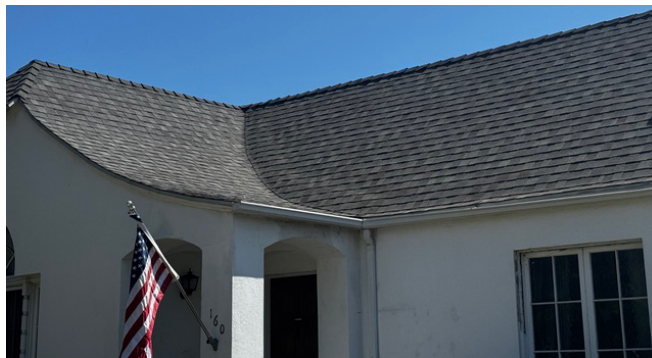
Exhibit B, Page 16.

Cement tiles generally look like this, much thicker than asphalt shingles:



A project described merely as “strip and install new” is therefore not sufficiently specific for a recorded **preservation** agreement. When was the existing composition roof installed, what is its current condition, and why is a complete reroof already being programmed as a Mills Act **rehabilitation** expense *after* solar panels were recently installed?

- The roof is clad in flat concrete shingle tiles, shaped and patterned to resemble slate, and includes minimal eaves with exposed rafter tails. A simple, rectangular chimney with a tapered stack and clay chimney pot projects from the rear gable end.



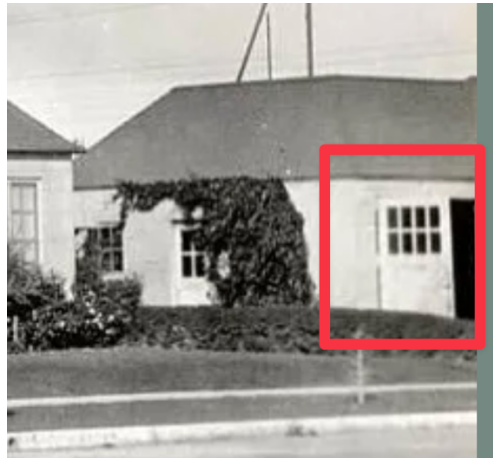
Current photo

If reroofing is to be one of the major rehabilitation expenditures under this contract, the plan should identify what historically appropriate roof is actually

being restored—not merely authorize stripping the current roof and installing an unspecified new one.

The garage presents another unexplained inconsistency

One historic photograph appears to show the detached garage with paired, side-hinged carriage-style doors. The garage currently has sectional overhead doors. **Yet the staff report states that the detached garage retains its “historic materials and detailing.” Clearly the public facing main garage doors do NOT retain historic materials and detailing.**



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The Ten-Year Rehabilitation Plan includes “garage door replace,” but does not specify whether the replacement will restore the historically documented door configuration or simply install another **contemporary** sectional door.

This is precisely the kind of question a preservation-oriented Ten-Year Plan **should answer**. This one does not. If the historic appearance is documented photographically and the current doors are later alterations, why does the rehabilitation plan not specify whether that historic character will be restored, especially on a corner lot facing a major street through Oxnard’s downtown?

Other apparent alterations, including a modern fireplace-door assembly, similarly appear not to be identified or evaluated in the staff report. I am not suggesting that every later alteration must automatically be removed. I am asking how staff determined what *should* be preserved, what *should* be restored, and what may remain altered **when no such analysis appears in the report**.

Much of the Ten-Year Plan appears to be ordinary maintenance or remodeling

The proposed rehabilitation schedule includes expenditures for such things as new kitchen counters, laundry cabinetry, a laundry door, bathroom tile, fence and gate work, a garage door, exterior painting, gutters, and the unspecified reroof.

Some of these may certainly be necessary work. But a Mills Act contract is not simply **a ten-year home-improvement financing plan**. The staff report describes the program as an agreement under which the owner will **restore, repair, maintain, and protect the historic property and its character-defining elements**.

Wouldn't every homeowner enjoy a break on their taxes to do routine maintenance and replacements???

The proposed schedule does not adequately distinguish among:

- **preservation** of historic material;
- **restoration** of lost historic character;
- ordinary **maintenance**;
- replacement of **deteriorated material**;
- and discretionary **remodeling**.

Nor does it explain how each proposed expenditure advances *preservation* of the particular historic characteristics for which this property supposedly qualifies.

That distinction is especially important because the Cultural Heritage Board expressly has authority to recommend **different or additional preservation or rehabilitation projects** in the Ten-Year Rehabilitation Plan.

The rehabilitation plan does not appear to follow the contract's *repair-first* preservation standard

The preservation standards incorporated into the proposed contract expressly state that changes which have acquired historic significance in their own right are to be **retained and preserved**; that distinctive materials, features, finishes, construction techniques, and examples of craftsmanship are to be **preserved**; and that deteriorated historic features are to be **repaired rather than replaced**. **Replacement is appropriate only where the severity of**

deterioration requires it, and any replacement should match the historic feature in design, color, texture and, where possible, materials.

Replacement of missing features is supposed to be supported by documentary and physical evidence.

Yet the Ten-Year Rehabilitation Plan contains several broadly worded replacement or “new” projects without documenting the condition of the existing material, whether repair was considered, or why replacement is necessary. Most notably, the roof project is described simply as “strip and install new,” with no explanation of the existing roof’s condition, whether repair is feasible, what historic roofing material is being preserved or restored, or what the replacement material will be. From the street, the roof appears to be fine. It makes me wonder if the subsequent solar installation last year did some harm to the roof and now it’s in need of replacement. And how will that be handled? Will the solar, recently installed, be removed and reinstalled over the new roofing material? **Generally, homeowners get a new roof BEFORE putting in solar.**

The same concern applies more generally to replacement doors, new built-ins, counters, and other work. If these descriptions are merely shorthand, the contract should be corrected to state what is actually intended. A recorded ten-year preservation plan should not leave the Board, future owners, or the public to guess whether “new,” “replace,” and “repair” are being used interchangeably.

The omission of some visibly deteriorated historic features is also difficult to understand. Exhibit B specifically identifies the original kitchen built-ins and cabinetry as significant historic features. Yet the rehabilitation plan does not identify repair or conservation of those cabinets, even though they presently show substantial wear, paint deterioration, and damage, while the plan does include **new** kitchen counters and **new** laundry built-ins. If the purpose of the Mills Act agreement is to **preserve and rehabilitate** character-defining historic material, the plan should explain why deterioration of expressly identified historic cabinetry is not being addressed while other improvement work is being prioritized.

The applicants themselves may not have been fully informed about what this program can and should accomplish

I am also concerned that the applicants themselves may not have been given a complete understanding of what a Mills Act contract can and should accomplish for their property.

They may understandably view the program primarily as a means of obtaining property-tax savings to assist with repairs and improvements. But the staff report describes a substantially broader and continuing obligation: to restore, repair, maintain, and protect the historic property for **the life of the contract and possibly longer**. It also states that future alterations, including alterations to interior character-defining features, will require a Certificate of Appropriateness from the CHB or its staff.

IF the applicants have not been provided with a thorough assessment identifying which features are genuinely historic, which existing alterations could appropriately be reversed, which materials should be preserved, and what restoration opportunities the Mills Act savings could support, **then they may be entering into a long-term agreement without a complete understanding of either its obligations or its preservation potential.**

That would serve neither the applicants nor the public.

Because there is no supervision of the Historic District by Oxnard or the County, I would dare say that MOST of the homes here have done work without getting the proper approvals from the Cultural Heritage Board. The City of Oxnard clearly doesn't care about the quality of the Historic District and provides no incentives or help to make it better. They have no hand in its maintenance or integrity. Many of the homes here have modern garage doors and PVC fencing in their front yards, clearly done without the absurd and expensive "Certificates of Appropriateness."

The property's "contributing" designation also deserves more scrutiny than staff gives it

I understand that an *individually* designated landmark is not required for Mills Act eligibility and that a contributing property within the Henry T. Oxnard Historic District *may* qualify.

However, that makes the reliability of the property's **contributing designation** particularly important.

The 1999 National Register documentation identified 139 of the district's 144 (there are currently only 142 as 2 were torn down on F Street) houses as contributing and only five as noncontributing. Many individual property entries contain only brief descriptions rather than detailed property-specific analyses of significance and integrity.

The document did recognize that alterations could matter. For example, 450 South G Street was specifically classified as noncontributing because the house had been "altered and remodeled." Yet the individual entry for 160 South G Street—upon which its contributing status appears to rest—contains the historical inaccuracies described above.

The current staff report nevertheless treats that inherited contributor status as essentially conclusive of Mills Act eligibility and concludes that only minor alterations have occurred without providing a detailed present-day integrity analysis.

At minimum, the Board should know whether the factual assumptions underlying the original "©" designation remain valid before that designation is used as the

principal basis for granting a continuing property-tax benefit that keeps tax revenue from the city and its people.

The local landmark designation itself proceeded with limited owner participation

The history of the local district designation is also relevant context.

The September 1999 City Council staff report stated that only **40 property owners responded** to the notice concerning designation of the Henry T. Oxnard Historic Area, even though the district contained approximately 144 homes. Of those 40 respondents, staff reported that **35 consented and then characterized that as an “87.5% approval rate.”**

That 87.5% figure was therefore not approval by 87.5% of **affected property owners**. It was 87.5% of the relatively small group that responded. **Only roughly 28% of the approximately 144 properties were represented among the responses, and the reported affirmative responses represented roughly one-quarter of the homes in the district.**

There is even an unexplained discrepancy within the Council packet: the attachment actually lists **33 consenting properties and five non-consenting properties**, rather than the 35 consenting out of 40 responses stated in the staff report.

Nevertheless, the entire area was designated as a local historical landmark, and homeowners that wanted no part of it were forced to participate and follow CHB rules and regulations.

This does not invalidate the district designation. It does, however, underscore why decades-old district inclusion should not substitute for a careful, current, property-specific evaluation when the City is now considering an individual tax-benefit contract. **For me, it does indicate that the historic designation should be considered for possible removal. If you’ve driven through the historic district of late....there’s not much to see here, folks! This ain’t no Beacon Hill in Boston to be proud of. The efforts of the CHB here are like putting lipstick on a pig.**

The City should identify what broader preservation objective this Mills Act contract is intended to advance

The State’s Mills Act guidance explains that local governments may design their programs around specific community preservation priorities, including rehabilitating entire neighborhoods, encouraging seismic safety, **promoting heritage tourism, revitalizing older areas, building civic pride, and preserving a community’s sense of place and continuity with its past.**

THE CITY OF OXNARD DOES NONE OF THAT!

That broader purpose is particularly relevant in the Henry T. Oxnard Historic District. The City regularly identifies and promotes the district as an important historic resource, yet the staff report for this application identifies no broader district preservation strategy, rehabilitation priority, neighborhood objective, or public preservation goal that this particular Mills Act contract is intended to advance.

Instead, the analysis largely proceeds from the fact that the house carries an *inherited* decades-old contributing designation and that the owners have submitted a ten-year list of proposed work.

If the Mills Act is intended to be more than an automatic property-tax reduction for qualifying owners, the City should be able to explain **what preservation priorities it is using the program to accomplish in this district and how this particular contract advances those priorities.**

The City's preservation system should also be applied consistently

My concern is reinforced by my own experience with Cultural Heritage review.

When I needed to replace a badly cracked and uneven portion of what was believed to be an original concrete walkway at my own property, I proposed tumbled pavers specifically selected to look aged (and at a higher cost for me), remain appropriate to the historic setting, and allow future repairs without repeatedly demolishing concrete. I was initially told by **Dillan Murray** that the walkway should be replaced like-for-like with concrete. I challenged that conclusion and ultimately prevailed, as I have on several occasions.

Another neighborhood property owner with a very old, termite-damaged and barely usable garage was not permitted simply to remove it and replace it. He was required instead to construct another garage right in front of it while leaving the deteriorated historic structure standing, on an already small plot of land. It sits there to this day.

Those experiences demonstrate just how restrictive **preservation review** can be when an owner is attempting to make changes to a "historic property."

That makes it difficult to understand why a Mills Act applicant should receive a continuing property-tax benefit based upon a rehabilitation plan containing **routine improvements and replacements** without a correspondingly rigorous examination of existing alterations and genuine restoration opportunities.

There is also an inherent inequity in tying Mills Act eligibility so heavily to historic-district boundaries. A particularly striking example exists only two blocks from 160 South G Street.

Thomas Henry Carroll, a prominent early Oxnard builder whose work included my house (The Henry Levy House), Oxnard City Hall, the Oxnard Public Library, St. John's Hospital, the Knights of Columbus building, two local churches and the Pagoda in Plaza Park, lived at the corner of Second and E Streets from at least 1910 until his death in 1946 and likely built the house as well. His residence is a substantial early house with an identifiable connection to a person who literally helped build some of Oxnard's most important civic landmarks. Yet it falls outside the boundaries of the Henry T. Oxnard Historic District and has no individual historic designation. **As a result, it is not eligible for Mills Act tax relief.** Meanwhile, a comparatively ordinary house only two blocks away at 160 South G Street qualifies because it happens to fall within a boundary drawn decades ago and was *arbitrarily labeled* a "contributing property." This illustrates the result produced when present-day Mills Act eligibility depends so heavily upon historic district boundaries rather than a current, comparative assessment of actual historic significance. An owner of the Carroll residence who wished to undertake substantial historically appropriate restoration (which it needs) would receive no Mills Act assistance at all, while the owner of 160 South G may receive a significant continuing tax benefit. **That disparity deserves consideration when the City evaluates what preservation objectives its Mills Act program is actually intended to accomplish.**



Oxnard builder, Thomas Carroll and his family at 169 S. E Street.

THE QUESTION IS, THEN: Why does 160 S. G Street deserve a tax break when a more historic house 2 blocks away doesn't, simply because it falls within the boundaries of the Henry T Oxnard Historic District?

The house on the left is a "Historic Landmark" but the house on the right isn't????



NOTE: I, myself, could use the tax break the Mills Act offers, but I can't afford to live up to the requirements the CHB would put on me. It's going to cost me about \$40,000 just to have my house painted and I have over 70 windows that need replacing. \$6600 off my taxes would be VERY helpful. But again, the requirements are just too demanding and way more expensive than the savings I would get on my taxes, **not to mention having invasive inspections by the very people who clearly didn't even take time to properly research the application in question. This is likely why only about 5 of the 142 houses in the Historic District Have Mills Act contracts (That number was provided to me a few years back by Dillan Murray...there may be more or less now.)**



My house: The Henry Levy House at 155 S. G Street

Requested action

For all of these reasons, I ask the Cultural Heritage Board **not to recommend approval of this contract in its present form.**

Before a Mills Act contract for 160 South G Street is forwarded to the City Council, I believe the following should occur:

1. A complete and independently documented **historical assessment** should establish the property's construction date, original commissioning owner, architect, architectural description, ownership history, and appropriate historic name. **(As should all the houses in the historic district before ever granting another Mills Act Contract.)**
2. The property's **present condition should be documented**, including significant original materials, later alterations, nonhistoric replacements, deterioration, and feasible restoration opportunities.
3. Exhibit B should be revised so that the **character-defining features incorporated** into the recorded contract are demonstrably accurate.
4. The historic and **present roofing materials should be identified**, and any proposed reroof should specify the historically appropriate treatment rather than simply "strip and install new."
5. The historic **garage-door configuration and current sectional doors should be evaluated**, and the planned garage-door replacement should specify the preservation or restoration objective.
6. The Ten-Year Rehabilitation Plan should clearly **distinguish historic preservation and rehabilitation from ordinary maintenance** and discretionary remodeling and explain how each proposed project advances the property's historic preservation.
7. **Staff should explain the factual basis** for its conclusion that only "minor alterations" have occurred and that the property retains integrity of design, materials, and workmanship.
8. **The applicants should be fully informed about the restoration opportunities, continuing preservation obligations, Certificate of Appropriateness requirements, and long-term consequences of entering into the Mills Act contract.** (See note below)
9. Require the Ten-Year Rehabilitation Plan to document the condition of historic materials proposed for replacement, explain why repair is not feasible where replacement is proposed, and identify how each replacement will comply with the repair-first standards incorporated into the contract.
10. Explain the City's preservation priorities for use of the Mills Act within the Henry T. Oxnard Historic District and identify the specific public preservation objective advanced by this contract beyond routine maintenance and private property improvement.
11. Explain why 160 S. G deserves the tax incentive when a house like the one at 169 S. E Street, which is FAR more historic in style and history, doesn't get a similar tax break

Note: no new homeowner in the Historic District is given the "rules" they are expected to follow before purchasing a home here, like you would if you moved into an HOA. And in fact, many homeowners that I've spoken to who were here back in 1999, don't know all the rules they're expected to

follow! This district has been here almost 3 decades and no one has ever thought to put together a packet to give potential historic district homeowners, but they're expected to follow the rules anyway, and penalized if they don't.)

I support genuine historic preservation. But a recorded Mills Act agreement should begin with an accurate understanding of **what is actually historic, what survives, what has been altered, and what the public is receiving in exchange for the continuing property-tax benefit.** Should Oxnard be losing tax dollars to put lipstick on a pig?

I know the family that owned this house for decades prior to the new owners and I can ask them for historic photos of the interiors if need be.

The current owners are nice enough people (and new parents) but I feel that the way this project exists now could very easily mislead them into what to really expect from the Mills Act over the next 10 years. **Also, I feel that the current presentation being offered to the Oxnard City Council is not only chock full of errors, but also scant of important information necessary for them to make an informed decision.**

Thank you for your consideration.

Eric Andrist
The Henry Levy House
155 South G Street
Oxnard, CA 93030

Addendum: Concerns Regarding Advice I Received From Cultural Heritage Board Member Gary Blum

I am submitting this addendum separately because it raises a broader concern about administration of the Mills Act program, apart from the specific deficiencies I have identified in the proposed contract for 160 South G Street. ***I have sent this concern to the CHB before and it was clearly ignored, which goes to show exactly the kind of carelessness about the accuracy and quality of the office and the programs they deliver.***

Before purchasing my home, I communicated extensively with Cultural Heritage Board member Gary Blum about the Mills Act and the restrictions

that could apply to historic properties. Those communications began while I was still evaluating whether to purchase the Henry Levy House and while I was trying to understand what changes I could or could not make if I later entered into a Mills Act contract.

The written messages are troubling. (Emphasis below is mine.)

On May 1, 2021, after I expressed concern that certain interior changes might be restricted once the property became subject to a Mills Act contract, Mr. Blum advised me:

*“Ok, first don’t put that on the ten year plan list. Number two don’t pull a permit for that work. Number three get the Mills act **after** you modify that wall between the two rooms.”*

He immediately added:

“You do realize I should not be putting this writing but there is way around these things...”

He then described approved ten-year plans as involving “*several layers of compromise and mitigation,*” which he referred to as the “preservation dance.”

In the same discussion, Mr. Blum told me that applicants themselves determine what they submit for inclusion in the Ten-Year Rehabilitation Plan, stating:

“You are in charge of determining what you want to submit. No ones telling you what to put on your ten plan.”

He added that he had “*coached a half a dozen folks*” on how to use the program. Does this program really require “coaching” from CHB Board members and is that really appropriate?

When we discussed a bathroom alteration, Mr. Blum advised:

*“Like that bathroom. You need to pitch that as an accessibility issue **and not include it on the ten year plan.**”*

He also stated:

*“You can make changes **but it’s how you pitch it. It takes some skill and experience to make your case.** And some things will not be on your Mills Act plan that will be applicable that you want to do.”*

And, in discussing the financial expectations of the program, he wrote:

“The County will tell you that you need to spend as much as you are saving but you really don’t.”

These were not statements I attribute to him from memory. They were written directly to me and I will include screen shots below.

I find this deeply concerning because the Mills Act is supposed to be administered as a historic-preservation program, **not as a system in which applicants are coached on how to omit work from a rehabilitation plan, avoid permits, complete changes before contractual protections attach, or strategically “pitch” projects so they receive more favorable treatment.**

I understand that historic-preservation programs necessarily involve judgment and reasonable compromise although I haven’t found the City or County to ever be in a mood to offer compromise. I also understand that not every interior alteration is prohibited and that not every project belongs in a Mills Act rehabilitation plan. But there is a substantial difference between explaining the applicable rules and advising a prospective applicant to **avoid placing work on the ten-year plan, avoid obtaining a permit, perform the alteration first, and apply for the Mills Act afterward.**

The fact that Mr. Blum himself wrote that he “should not be putting this in writing” makes the exchange particularly difficult to dismiss as ordinary educational guidance.

Again, these communications raise serious questions about the consistency and integrity of Mills Act administration. If applicants are being privately advised about ways to structure, omit, delay, or characterize projects in order to avoid scrutiny, then the Board and the public cannot be confident that Ten-Year Rehabilitation Plans provide a complete and candid picture of what is actually occurring at Mills Act properties.

How many other properties has Gary Blum “coached.” As I understand it, Blum has been relieved of all of his paid duties with the City of Oxnard.

I believe these communications warrant independent review by the appropriate appointing and oversight authority. At a minimum, **there should be a clear determination of whether this type of advice is consistent with**

the duties expected of a Cultural Heritage Board member and with the purpose of the Mills Act program.

I am attaching the relevant message exchange so the statements can be reviewed in their full context.

Eric Andrist

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The messages below are in reverse chronological order:

May 1, 2021, 6:07 AM

Gary Blum

Ok, first don't put that on the ten year plan list. Number two don't pull a permit for that work. Number three get the Mills act after you modify that wall between the two rooms. You do realize I should not be putting this writing but there is way around these things that will be a good compromise of preserving the home and making it the home you want to live in. If you were to see the Ten year plans we have approved you would feel a lot better. They are several layers of compromise and mitigation that is what I call the "preservation dance". Because I have said all this to you I will have to disclose that we had a conversation if it come to our Board for review. I'm gonna be honest to my appointment to a government body but I'm going to do my best to educate historic property owners on what they can do to protect our historic resources and be able to live a modern life.

May 1, 2021, 6:06 AM

Eric Andrist

Yeah, but we're not buying a 1.4 million dollar property with hopes of doing certain things that will only be thwarted after we move in. When I read the Mills Act it said you need to strive to use the funds to restore the house as closely to it's original form as possible. I told you before we saw it how small the "family room" and "sun room" look on the 1st floor and indeed, they are tiny rooms. You can't even get much furniture in the family room. If we're going to be told they have to stay that way, that's going to be a problem.

May 1, 2021, 5:57 AM

Gary Blum

No. You are in charge of determining what you want to submit. No ones telling you what to put on your ten plan. We will review that list and make suggestion and may decline and item that you need to replace with something else but we are not preservation nazis. People not understanding how the tool can be used or fearful of it is our biggest challenge. I've coached a half a dozen folks of how to do it.

May 1, 2021, 5:52 AM

Gary Blum

Yes. The Barkley's did not even go to the CHB for the kitchen remodel because the Oxnard ordinance does not require it for interior changes. If they had had a Mills Act and pulled a permit it would have required extra review but that did not happen. Plus modernizing a kitchen would not be a ten year plan item unless you were removing a 1950's kitchen that was less compatible. Kitchens and bathroom are easy to upgrade even on Mills Act homes because they are often so out dated.

May 1, 2021, 5:45 AM

Eric Andrist

Well, there's a lot there that's not "original." That kitchen is totally upgraded and there were no showers when the house was built.

May 1, 2021, 5:41 AM

Gary Blum

The County will tell you that you need to spend as much as you are saving but you really don't

May 1, 2021, 5:41 AM

Gary Blum

The CHB does not want to see upgrade items. Just preserving or restoring something.

May 1, 2021, 5:40 AM

Eric Andrist

I'll definitely need your help in figuring this stuff out!

May 1, 2021, 5:40 AM

Eric Andrist

I guess if you say it's for ADA requirements, they can't really say anything about it.

May 1, 2021, 5:39 AM

Gary Blum

You can make changes but it's how you pitch it. It takes some skill and experience to make your case. And some things will not be on your Mills Act plan that will be applicable that you want to do.

May 1, 2021, 5:38 AM

Gary Blum

The previous owners (before the current sellers) were going to get a Mills Act but did not because more expensive homeowners usually want to make more changes.

May 1, 2021, 5:37 AM

Eric Andrist

I know there's things we want to do on the inside. The 1st floor bathroom situation is very odd, and not suitable for guests/civic events to make them go all the way to the back of the house or upstairs to use the bathroom.

May 1, 2021, 5:36 AM