



Staff Report and Recommendations

Agenda of April 12, 2021, Item 10b

County of Ventura • Resource Management Agency • Planning Division

800 S. Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-5042 • vcrma.org/divisions/planning

I. APPLICANT/PROPERTY OWNER:

Applicant/Property Owner: Limoneira Company
Attn: Rosie Castillo
1141 Cummings Road
Santa Paula, CA 93060

Architect/Designer: Mica A Beving
Beving Architecture Inc.
P.O. Box 154
Ventura, CA 93002

II. REQUEST:

Request for a Certificate of Appropriateness (COA) (Cultural Heritage Ordinance (CHO) §1366) for various tenant improvements, demolition activities, and other alterations to the East Wing of the Limoneira Ranch Main Office building (Site of Merit). The scope of work includes interior tenant improvements of approximately 8,556 square feet for office use in addition to exterior modifications, including the replacement and modification of exterior doors and windows and construction of a 139-square-foot single-story covered entryway (Supervisory District 3 – Long) (Case No. CH21-0002).

III. LOCATION AND PARCEL INFORMATION:

1141 Cummings Road, Santa Paula, CA 93060 (unincorporated Ventura County)
Assessor's Parcel Number (APN): 090-0-010-145

Historic Designation: Site of Merit

The Limoneira Ranch is a visually coherent (National Register-eligible) district comprised of approximately 1,600 acres of citrus and avocado orchards divided by windrows of eucalyptus and poplar trees and natural barrancas. The main headquarters, located west of Cummings Road, contains two packing houses, offices, employee residences, warehouses, sheds, and garages. Figure 1 depicts the location of the project site in the broader vicinity; Figure 2 provides a closer image of the project site; and Figure 3 provides an image of the East Wing of the Limoneira Ranch Main Office building.

Figure 3 – East Wing of the Limoneira Ranch Main Office Building



IV. PROJECT SCOPE:

The applicant requests the Cultural Heritage Board (CHB) approve a COA for various tenant improvements, demolition activities, and other alterations to the East Wing of the Limoneira Ranch Main Office Building associated with Zoning Clearance Case No. ZC21-0032 (Refer to Exhibit 1 – Site Plans). More specifically, proposed work consists of the following:

- Internal improvements of approximately 8,556 square feet across both floors for office use, including demolition of existing internal walls and doors and construction of new offices, conference rooms, break rooms, restrooms, and access ways;
- Replacement of all exterior windows and doors with new to match appearance of existing due to stated deterioration and to provide energy efficiency and noise attenuation;
 - Replacement of two existing exterior doors with windows, construction of one new exterior entry door, construction of two new window openings, and infill of one existing window opening (Refer to Exhibit 5 – Photo Exhibit); and
- Construction of a 139-square-foot single-story covered entryway using materials to match existing.

V. PROPERTY DESCRIPTION AND HISTORICAL BACKGROUND:

The Limoneira Ranch is significant for the major role it played in the development of citrus, not just in the Santa Clara Valley, but in California and the nation (National Register Criterion A - events).¹ The ranch, established in 1893 by Nathan Blanchard, founder of Santa Paula, and Wallace Hardison, founder of Union Oil, rose to prominence as the foremost producer and shipper of lemons in California with a reputation as the world's largest lemon producer.²

In addition to the main headquarters nucleus of buildings, the property contains a variety of employee housing types, including larger houses for foremen and supervisors and clustered housing and courtyard housing for migrant workers. Landscape features include a small park and barbecue area, grassy play areas for children, numerous mature ornamental trees and small vegetable gardens maintained by individual workers.³

The Main Office consists of three separate buildings designed in an English Tudor and Craftsman style and connected by open porches; the buildings to the east and west of the central building mirror each other. They are long, two-story rectangular plan buildings with medium-pitched, front-facing clipped gable roofs covered in wood shingles.⁴ Each wing building contains recessed corner porches supported by heavy sandstone and wood columns. Windows are double hung with multi-panes in the upper sashes. All buildings are clad in dark, stained-brown wood shingles.

The East and West Wings were originally bunkhouses; they and the clubhouse/kitchen were designed by Roy Wilson and Edwin Thorne in 1923 (Refer to Exhibit 2 – DPR Form). In addition to the Limoneira Ranch property's association with significant events, the Main Office buildings are architecturally significant because of their distinctive English Tudor and Craftsman design and quality of construction. The builder, Santa Paula local William Hudson, also built other National Register-eligible structures in the area.

Various past structural and other alterations have been made to the East and West Wing buildings. In 2004, the property owner received permits to replace all existing second floor exterior windows to match existing, replace doors to meet ADA requirements, and make internal improvements to the office space by demolishing existing walls. These changes were authorized by the Cultural Heritage Board (CHB) with several recommendations, namely, that the applicant store doors with the hardware for reuse where possible, documentation of the second floor interior layout, and creation of an interpretive room. Following implementation of these alterations, no original bunkhouses remain in the East Wing building. However, based on Staff

¹ Western Santa Clara Valley Historic Resources Survey, Phase V, July 1996.

² Ibid.

³ Ibid.

⁴ Ibid.

review of the existing windows, it does not appear the windows on the East Wing building were ultimately replaced.

VI. CHO ANALYSIS AND STAFF CONCLUSIONS:

The Ventura County Cultural Heritage Ordinance (CHO) § 1366, requires that the Cultural Heritage Board issue a Certificate of Appropriateness (COA) in the case of proposed demolition activities at a Site of Merit. The COA is an authorization which indicates that any proposed action, including maintenance, alteration, restoration, rehabilitation, remodeling, addition, change of use, demolition, subdivision, or relocation of a designated or potentially eligible Cultural Heritage Site will not adversely affect the designated Cultural Heritage Site’s values or unduly compromise the eligibility of a potential site to become a designated Cultural Heritage Site.

CHB Staff determined that the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (“Secretary’s Standards”) may be useful to the CHB in their evaluation of the property and the proposed scope of work. CHB Staff determined the standards for rehabilitation are appropriate for this request and evaluated the proposed scope of work against these standards. Each one of the applicable Secretary’s Standards is outlined in the table below with corresponding comments from CHB Staff.

Standards	Staff Comments
<p>#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>	<p>The property will continue to be used for office space to support the agricultural operations of the ranch following implementation of proposed alterations.</p> <p>Staff determined that this Standard has been met.</p>
<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>	<p>The Secretary’s Standards⁵ 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>The applicant proposes to replace all exterior windows and doors due to stated deterioration in existing materials and water damage, as well as to provide greater energy efficiency and noise</p>

⁵ 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
	<p>attenuation. As mentioned, repair, rather than replacement, is recommended for historic features. Staff determined that repair appears to be a suitable treatment for the existing windows. The proposed replacement windows will match the existing in appearance. The multi-panes in the upper sash will be retained conveying the same visual appearance, although the proposed exterior cladding is aluminum rather than wood (painted to match) and the divided lights simulated. These alterations are not considered consistent with this Standard.</p> <p>In addition, the applicant proposes replacement of two existing exterior doors with windows, construction of one new exterior entry door, construction of two new window openings, and infill of one existing window opening. Changing the number, location, size or glazing pattern of windows, through cutting new openings or blocking-in windows, is not recommended. The alteration of the original pattern of fenestration is not consistent with this Standard.</p> <p>Further, the applicant proposes construction of a new 139-square-foot single-story covered entryway. As mentioned previously, the Main Office consists of three separate buildings; the buildings to the east and west of the central building are designed to mirror each other. The addition of the covered porch may alter the spatial pattern of the buildings; however, this arrangement does not appear central to the buildings' architectural significance, which is due to the English Tudor and Craftsman design and quality of construction. Moreover, the covered entryway could be removed in the future, if desired, while retaining the essential form of the building. This component appears to be consistent with this Standard.</p> <p>Lastly, proposed interior improvements involve demolition of walls and reconfiguration of office spaces. The original pattern of walls and interior spaces were distinctive characteristics that made them bunkhouses; however, due to prior alteration, none of these original bunkhouses remain. Due to</p>

Standards	Staff Comments
	<p>this, this component is consistent with this Standard.</p> <p>Therefore, Staff determined the interior scope of work is generally consistent with this Standard; however, the proposed window replacement and fenestration pattern alterations do not appear consistent with this Standard.</p>
<p>#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.</p>	<p>It does not appear that conjectural design features are proposed to be added to the historic property with the intent to create a false sense of historical development. Therefore, Staff determined this Standard has been met.</p>
<p>#4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.</p>	<p>There do not appear to be changes to the property that have acquired historic significance in their own right. Therefore, Staff determined this Standard has been met.</p>
<p>#5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.</p>	<p>At the time of survey evaluation, the building was noted as a good example of English Tudor and Craftsman design with little alteration. The building would retain distinctive features of this style, including the medium-pitched, front-facing clipped gable roof, recessed corner porches with heavy sandstone and wood columns, stained-brown wood shingles, and style of windows. However, the existing windows proposed to be replaced appear to be original.</p> <p>Staff determined this Standard has generally been met, with the exception of the proposed window replacement.</p>
<p>#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.</p>	<p>As mentioned previously, repair appears to be a suitable treatment for the existing windows rather than replacement. The proposed replacement windows would match the existing in appearance. The multi-panes in the upper sash will be retained conveying the same visual appearance, although the proposed exterior cladding is aluminum rather than wood (painted to match) and the divided lights simulated. These alterations are not considered consistent with this Standard.</p>

Standards	Staff Comments
	<p>Staff determined this Standard has generally been met, with the exception of the proposed window replacements.</p>
<p>#7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.</p>	<p>No such treatments are currently proposed. Therefore, Staff determined this Standard is not applicable to the proposed scope of work.</p>
<p>#8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.</p>	<p>Substantial ground disturbance is not currently proposed. Therefore, Staff determined this Standard is not applicable to the proposed scope of work.</p>
<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>As mentioned previously, the applicant proposes construction of a new 139-square-foot single-story covered entryway. The addition of the covered porch may alter the spatial pattern of the mirrored buildings; however, this arrangement does not appear central to the buildings’ architectural significance, which is due to the English Tudor and Craftsman design and quality of construction. The entryway would be of appropriate scale and would match the East Wing building in materials, design, texture, and other visual qualities. Moreover, the covered entryway could be removed in the future, if desired, while retaining the essential form of the building. This component appears to be consistent with this Standard.</p> <p>Further, the applicant proposes to replace all exterior windows and doors due to deterioration in existing materials and water damage, as well as to provide greater energy efficiency and noise attenuation. As mentioned, repair, rather than replacement, is recommended for historic features. Staff determined that repair appears to be a suitable treatment for the existing windows. The proposed replacement windows will match the existing in appearance. The multi-panes in the upper sash will be retained conveying the same visual appearance, although the proposed exterior cladding is aluminum rather than wood (painted to match) and the divided lights simulated. These</p>

Standards	Staff Comments
	<p>alterations are not considered consistent with this Standard.</p> <p>In addition, the applicant proposes replacement of two existing exterior doors with windows, construction of one new exterior entry door, construction of two new window openings, and infill of one existing window opening. Changing the number, location, size or glazing pattern of windows, through cutting new openings or blocking-in windows, is not recommended. The alteration of the original pattern of fenestration and spatial arrangement thereof is not consistent with this Standard.</p> <p>Based on the above, Staff determined 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>The new entryway would match the East Wing building in terms of materials, design, texture, and other visual qualities. The covered entry could be removed in the future without impairing the essential form and integrity of the historic property.</p> <p>Therefore, Staff determined that this Standard has been met.</p>

VII. STAFF CONCLUSION:

Based on the above considerations, the proposed scope of work appears partially consistent with the Secretary’s Standards. Of notable exception, the applicant proposes to modify the fenestration pattern through the introduction of new windows, in-fill of an existing window, and the conversion of doors to windows. These alterations represent changes to character-defining features which are not supported by documentary evidence. Therefore, Staff recommend redesign of the project to the extent feasible to eliminate the need for fenestration pattern alterations.

Further, the applicant proposes to replace all exterior windows when repair, rather than replacement, is recommended for historic features. Based on the visible condition of the existing windows, repair appears to be a suitable treatment. A number of window repair solutions are available, such as removing excessive layers of paint, replacing loose window putty, and ensuring each window fits tightly in the jamb, in addition to

methods of weatherization.⁶ Moreover, light to moderate repair is generally more cost-effective than replacement. However, replacement may be necessary to meet the applicant's stated goals of greater energy efficiency and noise attenuation. Based on a review of case precedent, the CHB has supported this approach in the past. Staff determined the proposed window replacements would maintain the same visual qualities as the existing with the exception of material (aluminum clad) and the simulated divided lights. In the case of window replacement, Staff generally recommend the use of in-kind wood windows in lieu of alternate materials in order to match the original features as closely as possible.

Based on the above, Staff recommend the CHB adopt the following conditions related to the scope of work in order to conform to the Secretary's Standards:

- **Recommended Condition #1: Fenestration Pattern.** The applicant shall retain the existing pattern of fenestration by avoiding to the greatest extent feasible the construction of window openings where they did not exist previously, the filling in of existing windows, and the conversion of existing doorways to windows. Prior to issuance of zoning clearance, the applicant shall submit revised plans for Staff review.
- **Recommended Condition #2: Exterior Windows.** Staff recommend the applicant retain and repair the existing exterior windows rather than replace. However, should the CHB find replacement of the windows appropriate to meet the applicant's stated goals of greater energy efficiency and noise attenuation, the applicant's proposed replacement windows appear to accurately replicate the appearance of the existing windows, including dimensions, muntin profile, lugs, and other features. If replacement is determined appropriate, the applicant shall submit for Staff review revised plans reflecting any additional CHB direction regarding the replacement windows, as may be necessary.

With adoption and adherence to the above-recommended conditions, Staff determined the project would conform to the Secretary's Standards and would neither adversely affect the significant architectural features nor adversely affect the character of historical or aesthetic interest or value of the site, pursuant to the requirements of the CHO Section 1366-3(a).

VIII. OPPORTUNITY TO SHOW HARDSHIP:

⁶ National Park Service, Technical Preservation Services, *Preservation Brief #9: The Repair of Historic Wooden Windows*, <https://www.nps.gov/tps/how-to-preserve/briefs/9-wooden-windows.htm>.

At the CHB public hearing on this matter, if desired, the property owner is provided the opportunity to present facts and evidence demonstrating a failure to grant the requested COA would cause an economic hardship as provided by CHO §1366-3(d).

IX. PUBLIC COMMENTS:

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

X. RECOMMENDED ACTIONS:

Pursuant to CHO Section 1366, the following sets of actions are available to the CHB. Staff is recommending the CHB approve the COA with inclusion of the recommended conditions identified above.

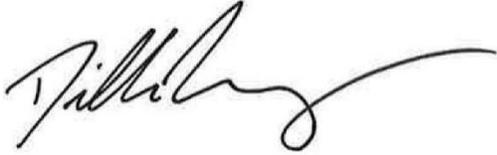
A. To Approve the COA:

1. **CONDUCT** public hearing, **RECEIVE** oral and written testimony, and **CONSIDER** the Planning Division Staff report and all exhibits and attachments hereto;
2. **FIND** that the proposed project does meet the requirements of the Ventura County Cultural Heritage Ordinance and the *Secretary of the Interior's Standards*; and
3. Based on the preceding evidence and analysis, **APPROVE** the Certificate of Appropriateness (Cultural Heritage Ordinance [CHO] § 1364-12) with any Cultural Heritage Board or Staff recommendations determined necessary to conform to the *Secretary of the Interior's Standards*.

B. To Deny the COA:

1. **CONDUCT** public hearing, **RECEIVE** oral and written testimony, and **CONSIDER** the Planning Division Staff report and all exhibits and attachments hereto;
2. **FIND** that the proposed project does not meet the requirements of the Ventura County Cultural Heritage Ordinance and the *Secretary of the Interior's Standards*; and
3. Based on the preceding evidence and analysis, **DENY** the Certificate of Appropriateness (Cultural Heritage Ordinance [CHO] § 1364-12).

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Reviewed by:



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Exhibits:

- Exhibit 1 – Site Plans
- Exhibit 2 – Limoneira Main Office DPR Form
- Exhibit 3 – Proposed Entry Rendering
- Exhibit 4 – Architectural Cut Sheets – Windows, Shingle, and Stone
- Exhibit 5 – Photo Exhibit