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For the future of every student

State Historical Resources Commission
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**Re: Comment to Historical Designation Nomination
Washington Elementary School, Ventura County**

Dear Commission:

Ventura Unified School District (the “District”) is the current owner of Washington Elementary School site, located at 96 MacMillan Avenue, Ventura Ca 93001 (the “Washington Property”). Thus, the District submits the following comment regarding the nomination of the Washington Property to the National Register of Historic Places (National Register).

I. Introduction

While the District shares the community’s desire to protect historically significant landmarks throughout Ventura, the District does not believe that the Washington Property nomination accurately reflects the historical significance of the Washington Property. The District bases this conclusion on the independent analysis of the National Register nomination document for the Washington Property performed by Pamela Daly, a qualified Architectural Historian retained by the District. Ms. Daly provided a peer review analysis of the nomination document using National Register Bulletin 15, National Register Bulletin 16A, and independent research including site visitation, set forth below in this comment.

Ms. Daly’s review revealed that the nomination includes several misstatements regarding the history and significance of the Washington Property, and fails to support its claims that the Washington Property meets Criterion A and C for listing in the National Register. We put forth that by accepting the nomination document for the Washington Property “as is” this action would formalize the inaccurate representations in the nomination and devalue the historic significance of properties that truly possess historic importance.

The District remains committed to collaborating with the community regarding the Washington Property when assessing its potential future uses, but does not believe the Washington Property, due to substantial alterations and lack of physical integrity, should be deemed an important historic resource. Specifically, the nomination states the Washington Property is historically significant because it meets Criterion A and Criterion C for listing a property in the National Register. Regarding Criteria A, the nomination suggest the Washington Property is significant “in the area of Education for its association with the history of education in Ventura and the impact of the Field

Act of 1930s school design.” However, as indicted in the nomination, the Field Act was a state-wide mandate that applied to all schools in California. The District can confirm that all its elementary school sites comply with the Field Act. The nomination does not explain how the Washington Property is unique in its Field Act compliance and how it is important to the history of education in Ventura. However, these revisions resulted in the Washington School site losing eighty five percent (85%) of its original architectural features. Mr. Burkett did not save or restore the original architectural details of the Washington Property during these revisions.

Regarding Criteria C, the nomination suggests Washington Property “is eligible as a good and rare example of an educational building redesigned in response to earthquake safety concerns in the City of Ventura.” Because the Field Act is a California law, all schools in Ventura were required to be rehabilitated to the standards for earthquake preparedness set by the Field Act. The nomination provides no facts to show how the Washington Property is a “good and rare” example of Field Act compliance in Ventura and California. The nomination does not provide these facts because it cannot: There are likely several school buildings throughout California that were redesigned pursuant to the Field Act but maintained their pre-1933 physical integrity of design, materials, and workmanship to a greater extent than the Washington Property.

Beyond these two main issues, the District’s historical expert provided a detailed analysis of the nomination which identifies several other misrepresentations within the nomination. The District’s historical expert visited the Washington Property and therefore, was able to assess the structures in their current form. Further, the nomination fails to provide the basic information required by the National Register’s bylaws, as indicated in the expert analysis provided below.

As noted above, the District submits this comment as a supporter of historical designations generally. The District believes that historically significant structures within Ventura should be maintained to not only benefit the community and preserve the rich history of Ventura, but also to assist the District in its mission to educate its students. However, after conducting its own analysis through its own historical expert, as summarized below, the District simply found no evidence that the Washington Property holds significant historical value generally or meets the requirements to be deemed a historical resource specifically.

The District will work with the local community when determining its future use. However, as the Property owner, the District felt compelled to alert the Commission to its findings regarding the nomination and the Washington Property. Based on its analysis, the District believes it would be a disservice to the historical designation process and to the Ventura community if the Washington Property was listed as a historical site. Thus, the District humbly requests the Committee consider these points, including the peer review analysis provided below, when assessing the nomination of the Washington Property.

II. Peer Review of the Washington Property National Register Nomination

The District, through Ms. Daly, reviewed the specific statements in the Nomination and provide the following list of the issues and questions about the Nomination's contents. The references in parenthetical refer to sections within the Nomination.

1. Section 1-6 page 3, Section 5 page 4

Nomination Description

Classification: Number of Resources within the Property

District Comment

- “Rules for Counting Resources: Count gardens, parks, vacant lots, or open spaces as ‘sites’ only if they contribute to the significance of the property.”
- The large playground and exercise field located to the east of the Main Building contributes to the identification of the property as being used historically as a school.

2. Section 7 page 4

Nomination Description

Description: Materials: Principal exterior materials of the property:
CONCRETE/BRICK

District Comment

- Per National Register Bulletin 16A “How to Complete the National Register Registration Form”, page 27 “Guidelines for Entering Materials”
Enter only materials visible from the exterior of a building. Do not enter material of interior, structural, or concealed architectural features even if they are significant. The correct exterior materials for the Main Buildings should be
Foundation: CONCRETE
Walls: STUCCO (the original brick walls have been totally covered with a thick layer of gunite.)
Roof: ASPHALT

3. Section 7 page 4

Nomination Description:

Summary Paragraph Last sentence: “The property retains all aspects of historic integrity.”

District Comment

- Per National Register Bulletin 16A, page 28 “Narrative Description – Summary Paragraph”
Describe the current condition of the property and indicate whether the property has historic integrity in terms of location, design, setting, materials, workmanship, feeling, and association.
- Washington Elementary School has not retained the aspects of physical integrity necessary to convey its importance to the history of EDUCATION or ARCHITECTURE in the City of Ventura, or in Ventura County.
- The original Main Building of Washington Elementary School (WES) was constructed in 1925-1929. It was designed by Mott Marston, an architect known for the work of architect George Washington Smith of Santa Barbara, CA.
- After the Long Beach Earthquake of May 1933, Ventura School District hired local architect Harold E. Burket to rehabilitate Washington Elementary School (the only building on the site at that time) with structural repairs to meet the requirements of the Field Act. Burket teamed up with a Structural Engineer (per Field Act building permit) responsible for devising a method of encasing all elevations of the brick building with a steel wire mesh and then spraying a 4-inch layer of gunite (liquid cement) over the mesh system. Burket’s rehab plans also called for the removal of approximately 65% of the exterior, character-defining features of the original Spanish Revival building as designed in 1925.
- In 1957, the local firm of Fisher and Wilde was hired by the District to “modernize” the interior and exterior of WES. Their plans called for the removal of all the few remaining pre-Field Act architectural details, the removal of all the original wood doors and windows, and replaced the windows with metal sash windows. The main entranceway arch was turned into a rectangular feature, and large planters were removed from the entrance

steps. At some point in time, character-defining red-clay barrel tile roof was removed from the Main Building.

- The Main Building was opened for students in 1925, and the last building constructed on the property was the Auditorium and Cafeteria complex in 1941. We fail to ascertain how the property contributed in a significant manner to the history of Education in the City of Ventura. We fail to find a connection between the property and the “process of conveying or acquiring knowledge or skills through systematic instruction, training, or study.” (NRB 16A)
- While the property has retained the historic aspects of integrity that include setting and location, the property has lost its ability to convey its history of a building constructed in the 1920s; has lost the original exterior designs of Mott Marston - including all the original wood windows and doors; the original brick walls were encased in cement in 1935, and finally – has lost the materials and workmanship used to create the exterior character defining features of the 1920s building.

4. Section 7 page 5

Nomination Description:

Narrative Description, Overview

“A 1,700-square-foot Bungalow is located to the south of the Main Building. It was originally designed by Mott Marston for Sheridan Way School and moved to this location in 1953.”

District Comment

- This text should read: “It was originally designed by Mott Marston as a standalone kindergarten building for Sheridan Way School.....”
- The “Bungalow” had been designed for use as a kindergarten building, and has continually used for educational purposes, and not as a residential living space such as a bungalow, cottage, or small house.

5. Section 7 page 5

Nomination Description

Narrative: Main Building

“Eyebrow dormer vents are located on the center of the roof of each wing.”

District Comment

- The roof features are half-round roof vents, not eyebrow dormer vents. All references to the “eyebrow dormer vents” in the text are incorrect.

6. Section 7 page 5

Nomination Description

Narrative: Main Building

“This style of window is found on all elevations and consists of six rectangular lights with a lower tilt-in sash.”

District Comment

- The large, steel-frame windows are comprised of three sections: the top section is comprised of two horizontal rows that create one fixed panel. The middle section is comprised of two, joined horizontal rows that open as an awning window, and finally, the bottom section is comprised of two horizontal rows of which the bottom row opens as a hopper window and the upper row is a fixed panel of lights.

7. Section 7 page 5

Nomination Description

Narrative: Main Building

“A utility entrance located on the lower story to the east of the porch consists of metal doors with square vents above.”

District Comment

- There is no “porch” on this elevation, and the square vent above the pedestrian entrance is a fixed light transom situated in the opening where there had been an awning-style transom window.

8. Section 7 page 8

Nomination Description

Narrative: Auditorium “The building is clad in concrete....”

District Comment

- This is not true. The exterior walls of the auditorium building were constructed using poured concrete. The exterior walls clearly have evidence (ghost marks) of the wood forms used to create the walls.

9. Section 7 page 8

Nomination Description

Narrative: Auditorium

District Comment

- Per the history of the Auditorium and Cafeteria building “the shop building” from Lincoln School was moved to the WES property in September 1930 to be rehabbed into use as a freestanding cafeteria building. In the Narrative Description about the Auditorium, there is no discussion regarding the construction of the Auditorium onto the existing cafeteria building.

10. Section 7 page 9

Nomination Description

Narrative: Bungalow “.... it is capped by a front facing gable roof....”

District Comment

- This is not true. The building has a side gable roof. The gable roof end faces the street (faces west) but the primary entrance to the building is situated under the eaves of the north elevation.
- “The west elevation faces the parking area without an entrance and is not accessible from this side....” There is no reason to record that there isn’t an entrance on the west elevation.
- “The building interior was first remodeled when it was moved to this location from Sheridan Way School in 1953. The interior of the Bungalow was remodeled again in the 2000s and features two classrooms and a restroom.” The nomination does not establish how the interior remodeled in 1953 or how this remodel created historical significance. The building is currently comprised of its historical layout of one single large room (almost identical to the Kindergarten Room in the Main Building) with a small room for teaching staff and a single toilet bathroom.

11. Section 7 page 10:

Nomination Description

Integrity Location and Setting:

District Comment

- The text includes this statement “the setting of the school has not changed; it has had a....large field to the east since it was initially constructed.” The play fields to the east of the Main Building are noted as contributing to the property’s integrity, yet it is not counted as a contributing feature (site) of the property in Section 5, page 3.
- Design, Materials, and Workmanship: “The features specific to the Mott Marston design of the school have mostly been removed.” The Main Building now exhibits less than 95% of the architectural features that adorned the building when it was constructed in 1925. The Main Building was designed with a rich and elaborate presentation of Spanish Revival architectural features applied on the building that reflected the community’s rich fortunes from the discovery of oil in 1919.
- The School District hired and instructed architect Harold E. Burket to rehab the school in 1935 to bring the building in line with the Field Act. Possibly,

due to the rehab occurring during the Great Depression, Burket designed the alterations to the exterior to not only cover all the original brickwork, but also remove approximately 80% of the ornamental features situated primarily on the front elevation, and around the main building. The School District could have made the decision to re-establish the Spanish Revival architectural detail onto the rehabbed exterior, but made the decision to go with a diminished façade going forward.

- In 1957, the School District instructed the architectural team of Fisher & Wilde to “modernize” the Main Building, and that rehabilitation project resulted in the removal of all the original wood window and doors, and the last 17% of the original decorative architectural features of the historic 1925 facade. The main, arched-entrance way into the building was stripped of its last ornamentation and “squared-up” into a Mid-Century style design using straight lines and right angles.
- Even with all the alterations to the Main Building noted above, the nomination document states “Despite these changes, the Main Building still retains the integrity of design, materials, and workmanship dating to the period of significance associated with Burket’s remodeling of the school”.
- If the property is being nominated under Criterion A for its association with the theme of Education at the time of its construction in 1925, then this sentence is patently false. The Main Building has not retained the design, materials, and workmanship of the building as it appeared when constructed in 1925.
- If the property is being nominated under Criterion C for its association with Burket’s rehab of the building in 1935, after the Main Building had been of the majority of its original character-defining features, then the declaration that the Main Building has retained its physical integrity of 1935 is false. The rehab in 1957 stripped all of the applied Spanish Revival character-defining features remaining from Burket’s rehab of 1935.
- Feeling: “Feeling is a property’s expression of the aesthetic or historic sense of a particular period of time.” The present-day exterior of the Main Building points more towards a 1950s-1960s period of time in both Architecture and Education, rather than its historic period of significance.
- Association: the physical aspects of the Main Building, Auditorium, and Bungalow do not form a direct link to the opening of the school in 1925, the creation of the Field Act, New Deal building programs, or post-World War Two education facilities in Ventura or California.

12. Section 8 page 12:

Nomination Description

Period of Significance:

District Comment

- NR Bulletin 16A, page 42
- The nomination of WES under Criterion A must establish the Washington Property is associated with the evolution of education in Ventura but does not explain why the alleged period of significance only goes to 1957. The school was operating as a public school from the time it opened up to its closure in 1983. Is it being suggested that the property lost the aspects of integrity to associate the Main Building with both the themes of Education and Architecture in 1957?

13. Section 8 page 12

Nomination Description

Significant Dates 1935 and 1941

District Comment

- NR Bulletin 16A, page 43.
- The identified dates of significance contradict the idea that the Washington Property is a historically significant school site. If it was historically significant, the date of when WES opened its doors in 1925 would have some importance.
- Similarly, 1929 would also be important for when the entire building was completed. (It's when the courtyard would have been completed.)

14. Section 8 page 13

Nomination Description

Statement of Significance Summary Paragraph states the property is eligible under Criterion A “in the area of Education for its association with the history of education in Ventura and the impact of the Field Act on 1930s school design.

District Comment

- The Field Act was a statewide mandate that affected every school building in California.
- The nomination does not address how the method, manner, curriculum, housing, supervising of students attending schools in Ventura was affected/altered by the Field Act (post May 1933), at the elementary level or otherwise.
- Specifically, the nomination does not establish how students at WES were educated any differently than at other schools throughout the region or in California as a whole - due to the Field Act.

15. Section 8 page 13

Nomination Description

Statement of Significance Summary Paragraph state that the Property is eligible under Criterion C “in the area of Architecture [as the] school is eligible as a good and rare example of an educational building redesigned in response to earthquake safety concerns in the city of Ventura.”

District Comment

- All schools in Ventura were required to be rehabilitated to the standards for earthquake preparedness set by the Field Act in May 1933. Why is WES a good example when there are other school buildings currently existing in Ventura that were able to retain much of their original pre-1933 physical integrity of design, materials, and workmanship? By the completion of the rehab in 1957, WES had been stripped of all the character-defining features that associated the building with its construction in 1929, and its architect Mott Marston.

- The nomination does not establish how WES is a good example of the work of Harold E. Burket, when the results of his participation in the rehabbing in 1935, left the building stripped of 85% of its original character-defining architectural features. Burket didn't contribute or create any improvements to the building to save or replace any/all of the architectural details that were removed.

16a. Section 8 page 13

Nomination Description

Statement of Significance Summary Paragraph The nomination states that “the period of significance begins in 1925 when the building was remodeled post-Field Act and 1941 when the Auditorium was completed, and closes in 1957 when the Main Building was further remodeled to give the school a more modern appearance.”

District Comment

- The nomination does not explain why the period of significance does not extend past 1957 to correspond with the continuous and uninterrupted use of the school property when it was supposedly associated with public elementary school education in Ventura.

16b. Section 8 page 13

Nomination Description

Narrative Statement of Significance, Ventura City Schools.

District Comment

- Per NRB 16A, page 49, the nomination should “relate the property to important themes in the history of its community, State, or the nation. Include information about the history of the community or larger geographical area that explains the ways the property is unique or representative of its theme, place, and time.”
- The document states “the number of families that moved to Ventura during the 1920s and 1930s overwhelmed the existing school system...” Why did so many people move to Ventura in the 1920s and 1930s? If we are to evaluate

the significance of WES, then we need to have a full picture of the history of the city and community.

- The population explosion in Ventura, starting in 1919 was caused by the discovery of crude oil in the canyons, and off the beaches of Ventura. By 1923, Ventura was the largest producer of crude oil in the United States. Thousands of wells were dug and in 1924, 1.846 million barrels of oil were produced by the Ventura Fields. Just two years later, in 1926, the Ventura Fields produced 14.871 million barrels of crude oil. The U.S. Census of 1920 stated the population of Ventura was 4,156 residents, and by 1930 Ventura had a population of 11,603 residents.

17. Section 8 page 13

Nomination Description

Narrative Statement of Significance, Ventura City Schools.

District Comment

- “The wave of postwar residential development as the city expanded eastward required the building of many new elementary schools.....” The nomination seems to be shifting focus, without an explanation, to World War II. If the last building constructed (not moved) onto the WES property was the Auditorium in 1941, why is there such a lengthy discussion of school design in the postwar period. The history of school design, or Harold Burket’s professional career after 1945 is not relevant to the WES property.

18. Section 8 page 14

Nomination Description

Narrative Statement of Significance, Ventura City Schools.

District Comment

- There is a lengthy discussion of the professional history of Burket after 1941 (when he designed the Auditorium at WES under a New Deal program.) This discussion of Burket’s professional career after 1941 is irrelevant to the history of WES, when there is no evidence that Burket was associated in any way with WES after the construction of the Auditorium.

19. Section 8 page 14

Nomination Description

Narrative Statement of Significance, Ventura City Schools.

District Comment

- The discussion of schools designed and constructed in Ventura after 1941 is also irrelevant since other than removing all the wood windows and original doors, remaining architectural details on the front elevation, and creating a new rectangular design front entranceway in 1957, there were no changes made to the original massing of the WES since 1929, and no new buildings constructed on the property since 1941.

20. Section 8 page 18

Nomination Description

Narrative Statement of Significance, Ventura City Schools.

District Comment

- On this page is the only discussion about the teachers, or educational methods, used during the history of WES. While it is commendable that Clophine Bender Dooley was the principal of WES for 30 years, Mrs. Dooley's obituary (October 25, 1986) stated that her passion and primary interest was to establish an art museum in Ventura. She contributed her entire savings of \$400k to the Buenaventura Art Association for the purchase of a building to house a future art museum. A brief search did not uncover any innovative or important improvements in the history of education in Ventura created by Mrs. Dooley during her time at WES.

21. Section 8 page 19

Nomination Description

Narrative Statement of Significance, Ventura City Schools.

District Comment

- The text states “Students would be moved to other schools while architect Harold Burket worked on plans to make the school earthquake proof.” Burket and Structural Engineer Paul E. Jeffers (Los Angeles) were mandated by the Ventura School Board to rehab the building, and as the country was in the midst of the Great Depression, Burket was assigned to do the job as inexpensively as possible (per Division of State Architects (DSA) permit for WES).
- Immediately after the Long Beach Earthquake in March 1933, Paul E. Jeffers had been drafted by master architect John C. Austin to be the lead structural engineer to survey and evaluate all the schools in the Los Angeles County School District, except for those in Los Angeles and Long Beach. Jeffers had been born and raised in Los Angeles, and graduated from Stanford University as a civil engineer in 1913. He furthered his studies at Massachusetts Institute of Technology (MIT) for two years before returning to Los Angeles and working for several local architects before opening his own office in 1919. After the earthquake, Jeffers became a member of a committee to advise the Los Angeles School District on its general program of reconstruction for earthquake-damaged school buildings, and would become known as an authority on earthquake resistant structures in California. (*Los Angeles Times*. “Paul E. Jeffers of Building Fame Dies”, August 9, 1953.)

22. General Deficiency

District Comment

- There is no discussion of the street trees planted along the fence on the east side of the property along Hurst Avenue. These street trees were consciously planted to benefit WES and contribute to the ambiance of Hurst Avenue.
- Per NR Bulletin 16A, Guidelines for Describing Properties (page 31): Buildings, Structures, and Objects:
- For properties where landscape or open space adds to the significance or setting of the property, such asthe grounds of public buildings:
 1. Historic appearance and current condition of natural features.
 2. Land uses, landscape features, and vegetation that characterized the property during the period of significance, including gardens, walls,

paths, roadways, grading, fountains, orchards, fields, forests, rock formations, open space, and bodies of water.

23. Compliance with NR Bulletin 15: How to Apply the National Register Criteria for Evaluation

District Comment

- How to Evaluate a Property Within Its Historic Context: Determine what physical features the property must possess in order for it to reflect the significance of the historic context. *Comparing Related Properties:*

“Properties listed in the National Register must possess significance when evaluated in the perspective of their historic context. Once the context is established and the property type is determined, it is not necessary to evaluate the property in question against other properties if: It is the sole example of a property type that is important in illustrating the historic context or it clearly possesses the defined characteristics required to be strongly representative of the context. If these two conditions **do not apply**, then the property **will have to be evaluated against other examples of the property type to determine its eligibility.**”

- There are at least three pre-Field Act school properties in Ventura that have a higher level of physical integrity associated with 20th Century Spanish Revival architecture than WES. This comparison has not been presented in the NR nomination document.

24. Section 8 page 23

Nomination Description

Conclusion: Under Criterion A “... the property, one of the oldest extant city elementary schools, represents the evolution of education in Ventura.”

District Comment

- The nomination does not establish why WES is the most significant example of the “evolution of education” in Ventura.
- The nomination does not establish why WES is the most important example of elementary school education in Ventura

25. Section 9 page 33

Nomination Description

Sketch Map: Detail Main Building addition dates.

District Comment

- This location map is incorrect. The projecting section of the northeast corner of the building is the Kindergarten room that was part of the 1929 addition to the Main Building. The 1930 addition was comprised of the shop building that was moved to the property to create a standalone cafeteria building. The Auditorium building was attached to the west elevation of the cafeteria building in 1941, creating an Auditorium and cafeteria complex.

Photographs with the evidence of loss of physical integrity and character-defining features follow below:

Respectfully,



Antonio Castro, Ed.D.
Superintendent
Ventura Unified School District

WASHINGTON SITE PICTURES



1925-1929



Circa 1940



2024