APPENDIX B
Cultural Resources Assessment

Michael Baker INTERNATIONAL

We Make a Difference

February 26, 2026

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RE: CULTURAL AND PALEONTOLOGICAL RESOURCES ASSESSMENT FOR THE FIRST & MOUNTAIN VIEW PROJECT, SANTA ANA, ORANGE COUNTY, CALIFORNIA

Dear Ms. Tran:

The City of Santa Ana (City) is proposing the First & Mountain View Project (Project) on an approximately 2.54-acre (110,000-square-foot) site at 201 South Mountain View Street and 4320 West First Street in Santa Ana. The Project site consists of two parcels (Assessor Parcel Number [APN] 188-021-010 and 188-021-11) and is bounded by First Street on the north, Mountain View Street on the west, a municipal water pumping station on the south, and an apartment complex on the east. The two legal parcels have been evaluated as a single resource referred to by its primary address, 201 S. Mountain View Street (hereafter, 201 S. Mountain View Street or subject property). The Project would construct a new residential development consisting of 61 condominium units, with +/- 10,876 square feet of open space, and 136 parking spaces.

In support of the Project, Michael Baker International completed a South Central Coastal Information Center (SCCIC) records search; a literature, aerial photograph, and historical map review; Native American Heritage Commission (NAHC) Sacred Lands File search; built environment resource evaluation; paleontological sensitivity assessment; and archaeological sensitivity assessment, to determine whether the Project could result in significant impacts to historical, archaeological, and paleontological resources as defined by the California Environmental Quality Act (CEQA) in Section 15064.5 of the California Code of Regulations (CCR). Methods, results, and recommendations are summarized below.

PROJECT DESCRIPTION

The Project consists of the construction of a new residential development including 61 for-sale townhome units with approximately 10,876 square feet of common open space and 136 parking spaces. The residential community would consist of nine separate three-story townhouse buildings (four-plex to ten-plex) totaling approximately 103,759 square feet in living area (excluding garages and open spaces). The 61 units would result in a density of approximately 24 dwelling unit per acre and consist of six two-bedroom units, 25 three-bedroom units, and 30 four-bedroom units. Among these units, six are designed as accessible units and three are designed as live/work units. Five percent of the 61 proposed units (three units) would be designated as Very Low-Income units.

PROJECT SITE

The Project site is located on two legal parcels totaling approximately 2.54 acres, located at 4320 West 1st Street (Northern Parcel; APN 188-021-10) and 201 South Mountain View Street (Southern Parcel; APN 188-021-11; collectively with Northern Parcel, the Project site) (**Appendix A; Figure 2)**. The primary address associated with the Project site is 201 S. Mountain View Street. Generally, west of the Project site consists of South Mountain View Street as well as a vacant lot and equipment storage for the City of Santa Ana Public Works Department. Located directly east of the Project site is an existing multifamily residential community with established landscaping. Generally, south of the Project site is a water tank, and north of the Project site is West 1st Street/public right-of-way as well as a mix of residential and commercial building uses. The Project site is within Township 5 South, Range 10 West, Section 16, as depicted in the *Newport Beach Calif.* 1:24,000 United States Geographical Survey (USGS) Quadrangle (**Appendix A; Figure 2**).

Regulatory Framework

STATE

California Environmental Quality Act

Historical Resources

CEQA applies to all discretionary projects undertaken or subject to approval by the state's public agencies (CCR Title 14[3] Section 15002[i]). CEQA conditions that it is the policy of the State of California to "take all action necessary to provide the people of this State with historic environmental qualities and preserve for future generations examples of the major periods of California history" (Public Resources Code [PRC] Section 21001[b], [c]). Under the provisions of CEQA, "a project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (CCR Title 14[3] Section 15064.5[b]).

CEQA Guidelines Section 15064.5(a) defines a "historical resource" as a resource that meets one or more of the following criteria:

- Listed in, or eligible for listing in, the California Register.
- Listed in a local register of historical resources (as defined in PRC Section 5020.1[k]).
- Identified as significant in a historical resource survey meeting PRC Section 5024.1(g) requirements.
- Determined to be a historical resource by a project's lead agency (CCR Title 14[3] Section 15064.5[a]).

A historical resource consists of "any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. … Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing in the California Register of Historical Resources" (CCR Title 14[3] Section 15064.5[a][3]).

The CEQA planning process requires considering historical resources and unique archaeological resources (CCR Title 14[3] Section 15064.5; PRC Section 21083.2). If feasible, adverse effects to the significance of historical resources must be avoided or mitigated (CCR Title 14[3] Section

15064.5[b][4]). The significance of a historical resource is impaired when a project demolishes or materially alters adversely those physical characteristics of a historical resource that convey its historical significance and justify its eligibility for the California Register. If there is a substantial adverse change in the significance of a historical resource, the preparation of an environmental impact report may be required (CCR Title 14[3] Section 15065[a]).

If the cultural resource in question is an archaeological site, CEQA (CCR Title 14[3] Section 15064.5[c][1]) requires that the lead agency first determine if the site is a historical resource as defined in CCR Title 14(3) Section 15064.5(a). If the site qualifies as a historical resource, potential adverse impacts must be considered in the same manner as a historical resource (California Office of Historic Preservation [OHP] 2001). If the archaeological site does not qualify as a historical resource but does qualify as a unique archaeological site, then the archaeological site is treated in accordance with PRC Section 21083.2 (CCR Title 14[3] Section 15069.5[c][3]). In practice, most archaeological sites that meet the definition of a unique archaeological resource will also meet the definition of a historical resource. CEQA defines a "unique archaeological resource" as an archaeological artifact, object, or site about which it can be demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one or more of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
- Has a special and particular quality, such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person (PRC Section 21083.2[g]).

If an impact to a historical or archaeological resource is significant, CEQA requires feasible mitigation measures to minimize the impact (CCR Title 14[3] Section 15126.4[a][1]). Mitigation must lessen or eliminate the physical impact that the project will have on the resource. Generally, drawings, photographs, and/or displays do not mitigate the physical impact on the environment caused by the demolition or the destruction of a historical resource. However, CEQA (PRC Section 21002.1[b]) requires that all feasible mitigation be undertaken even if it does not mitigate impacts to a less than significant level (OHP 2001: 9).

PALEONTOLOGICAL RESOURCES

Paleontological resources are limited, nonrenewable resources of scientific, cultural, and educational value that are afforded protection under federal and state laws and regulations. The following section summarizes the applicable federal, state, and local laws and regulations, as well as professional standards.

Public agencies and private interests are required by CEQA to identify potential environmental consequences and/or adverse impacts of their proposed projects to any object or site important to the scientific annals of California (Division I, PRC 5020.1 [b]). Guidelines for the Implementation of CEQA (PRC Sections 15000 et seq.) define procedures, types of activities, persons, and public agencies required to comply with CEQA. Appendix G in Section 15023 provides an Environmental Checklist of questions that a lead agency should address if relevant to a project's environmental impacts. One of the questions to be answered in the Environmental Checklist Form (Section 15023, Appendix G, Section VII, part f) is the following: "Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?"

REGISTRATION PROGRAMS

California Register of Historical Resources

The California Register of Historical Resources (California Register) is the state's master list of known historic properties and was established by the California legislature in 1992. The California Register is a guide to cultural resources that must be considered when a government agency undertakes a discretionary action subject to CEQA. The California Register helps government agencies identify and evaluate California's historical resources (OHP, n.d.-a) and indicates which properties are to be protected, to the extent prudent and feasible, from substantial adverse change (PRC Section 5024.1[a]). Any resource listed in, or eligible for listing in, the California Register is to be considered during the CEQA process (OHP 2001: 7).

To be eligible for listing in the California Register, a resource must be significant under one or more of the following four criteria:

Criterion 1: Is associated with events that have made a significant contribution to the broad pattern of California's history and cultural heritage.

Criterion 2: Is associated with the lives of persons important in our past.

Criterion 3: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

Criterion 4: Has yielded, or may be likely to yield, information important in prehistory or history.

There is no minimum age requirement for listing in the California Register; rather, the California Register requires that sufficient time must have passed to allow a "scholarly perspective on the events or individuals associated with the resource." Fifty years is used as a general estimate of the time needed to understand the historical importance of a resource (OHP, n.d.-b: 3). The OHP recommends documenting, and taking into consideration in the planning process, any cultural resource that is 45 years or older (OHP 1995: 2).

In addition to meeting one or more of the above criteria, a resource must retain the essential aspects of integrity to be eligible for listing in the California Register, as discussed below.

Integrity

The California Register defines integrity as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association" (OHP, n.d.-b: 2).

Archaeologists use the term "integrity" to describe the level of preservation or quality of information contained within a district, site, or excavated assemblage. Integrity is relative to the specific significance that the resource conveys. Although it is possible to correlate the seven aspects of integrity with standard archaeological site characteristics, those aspects are often unclear for evaluating the ability of an archaeological resource to convey significance under Criterion 4. The integrity of an archaeological resource is judged according to the site's ability to yield scientific and cultural information that can be used to address important research questions (National Park Service 1997: 44–49).

Period of Significance

According to National Park Service guidance, on which the California Register methodology is based, the period of significance for a property is "the length of time when a property was associated with important events, activities, persons, or attained the characteristics which qualify it for National Register listing" (National Park Service 1997: 42). The period of significance begins with the date of the earliest important land use or activity that is reflected by historic characteristics tangible today. The period closes with the date when events having historical importance ended. The period of significance for an archaeological property is "the broad span of time about which the site or district is likely to provide information" (National Park Service 1997: 42). Archaeological properties may have more than one period of significance.

LOCAL

City of Santa Ana

Santa Ana Register of Historic Properties

The City of Santa Ana administers a program for designating properties and districts at the local level (City of Santa Ana 2007). To be eligible for listing in the Santa Ana Register of Historic Properties, a building, structure, object, or site must be at least 50 years old and meet one or more of the following criteria:

Criterion 1: Buildings, structures, or objects with distinguishing characteristics of an architectural style or period that exemplify a particular architectural style or design feature.

Criterion 2: Works of notable architects, builders, or designers whose style influenced architectural development.

Criterion 3: Rare buildings, structures, or objects or original designs.

Criterion 4: Buildings, structures, objects or sites of historical significance which include places: (a) where important events occurred; (b) associated with famous people, original settlers, renowned organizations and businesses; (c) which were originally present when the city was founded; and (d) that served as important centers for political, social, economic, or social activity.

Criterion 5: Sites of archaeological importance.

Criterion 6: Buildings or structures that were connected with a business or use which was once common, but is now rare.

Properties that are listed in the Santa Ana Register are assigned to one of three significance categories—Landmark, Key, and Contributive—based on their physical and associative qualities (City of Santa Ana 2007).

City of Santa Ana General Plan Update

The City of Santa Ana's updated General Plan Update (GPU) (October 2021) specifies that the following policies addressing paleontological resources shall be implemented at appropriate stage(s) of planning, coordinated with the processing of a project application, as follows:

Policy 1.4 Protecting Resources (**Historic Preservation Element**) - Support land use plans and development proposals that actively protect historic and cultural resources. Preservation tribal,

archeological, and paleontological resources for their cultural importance to communities as well as their research and educational potential.

In addition, the Program Environmental Impact Report (PEIR) for the City's GPU states that development consistent with the GPU could impact paleontological resources. Therefore, the following mitigation measures have been established to reduce these impacts to a less than significant level:

> **GEO-1 High Sensitivity.** Projects involving ground disturbances in previously undisturbed areas mapped as having "high" paleontological sensitivity shall be monitored by a qualified paleontological monitor on a full-time basis. Monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor shall have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, if the fossils are determined to be significant, professionally and efficiently recover the fossil specimens and collect associated data. The paleontological monitor shall use field data forms to record pertinent location and geologic data, measure stratigraphic sections (if applicable), and collect appropriate sediment samples from any fossil localities.
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> **GEO-2 Low-to-High** Sensitivity. Prior to issuance of a grading permit for projects involving ground disturbance in previously undisturbed areas mapped with "low-to-high" paleontological sensitivity (see Figure 5.6-3), the project applicant shall consult with a geologist or paleontologist to confirm whether the grading would occur at depths that could encounter highly sensitive sediments for paleontological resources. If confirmed that underlying sediments may have high sensitivity, construction activity shall be monitored by a qualified paleontologist. The paleontologist shall have the authority to halt construction during construction activity as outlined in Mitigation Measure GEO-3.
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> **GEO-3 All Projects**. In the event of any fossil discovery, regardless of depth or geologic formation, construction work shall halt within a 50-foot radius of the find until its significance can be determined by a qualified paleontologist. Significant fossils shall be recovered, prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility in accordance with the standards of the Society of Vertebrate Paleontology (2010). The most likely repository is the Natural History Museum of Los Angeles County. The repository shall be identified, and a curatorial arrangement shall be signed prior to collection of the fossils.

CULTURAL RESOURCES IDENTIFICATION METHODS

The results of the SCCIC records search, archival research, literature, historical map and aerial photograph review, field survey, local interested party consultation, NAHC Sacred Lands File search, archaeological site sensitivity analysis, and resource description are presented below.

SOUTH CENTRAL COASTAL INFORMATION CENTER

On July 31, 2025, Michael Baker International Senior Archaeologist Marc Beherec, PhD, RPA, conducted a records search at the SCCIC. The records search included the Project area and a half-mile radius. The SCCIC, located at California State University Fullerton, California, is part of the California Historical Resources Information System, an affiliate of the California OHP. It is the

official state repository of cultural resources records and reports for Orange County. As part of the records search, the following federal and California inventories were reviewed:

- National Register of Historic Places (National Park Service n.d.).
- California Inventory of Historic Resources (OHP 1976).
- Archaeological Resources Directory (OHP 2025a). The directory includes the OHP determinations of eligibility for archaeological resources in Orange County.
- California Points of Historical Interest (OHP 2025b).
- California Historical Landmarks (OHP 2025b).
- Built Environment Resources Directory for Orange County (OHP 2025c). The directory includes built resources reviewed for eligibility for the National Register of Historic Places and the California Historical Landmarks programs through federal and state environmental compliance laws, and built resources nominated under federal and state registration programs, including the National Register of Historic Places, California Register, California Historical Landmarks, and California Points of Historical Interest.

Results

Previous Studies

Nine cultural resources studies have previously been completed within 0.5 miles of the Project area. One of these studies (OR-3284) overlaps the Project area.

TABLE 1: PREVIOUS STUDIES WITHIN 0.5 MILES OF THE PROJECT AREA

Author	Report No.	Date	Title/Description	Within Project Area?
Bonner, Wayne H.	OR-01764	1998	Cultural Resources Records Search and Literature Review Report for a Pacific Bell Mobile Services Telecommunications Facility: Cm 094-01, in the City of Santa Ana, California	No
Padon, Beth	OR-01954	1996	Archaeological Archival Review and Survey of the Co 5 and Co 6 Flood Control Channels, Anaheim, Newport, and Seal Beach USGS 7.5' Quadrangles, Orange County, California	No
Fulton, Terri and Deborah McLean	OR-03284	2006	Cultural Resources Assessment for the Santa Ana West and East Pump Stations Project City of Santa Ana, County of Orange, California	Yes
Bonner, Wayne H.	OR-03445	2006	Cultural Resources Records Search and Site Visit Results for Royal Street Communications, LLC Candidate La0627b (Santa Anita Park), 125 South Figueroa Street, Santa Ana, Orange County, California	No
Padon, Beth	OR-03776	2000	Historic Property Survey Report for Harbor Boulevard Smart Street Improvements, City of Garden Grove, Orange County, California	No
Mc Elory, Sheila	OR-03776	2000	Historic Architectural Survey Report for Harbor Boulevard Smart Street Project for the City of Garden Grove, California	No
Dice, Michael	OR-03889	2003	A Cultural Resources Assessment: The Newhope Street Resurfacing Project, Edinger Avenue to Westminster Avenue, City of Santa Ana, California	No
Bonner, Wayne H.	OR-04008	2011	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidate LA33811-C (Leaning Tower of Newhope), 4440-3/4 McFadden Avenue, Santa Ana, Orange County, California	No
Brunzell, David	OR-04388	2014	Cultural Resources Assessment of the First Harbor Project, Santa Ana, Orange County, California (BCR Consulting Project No. TRF1416)	No

Previously Documented Resources

No cultural resources were previously identified within or immediately adjacent to the Project area.

No archaeological resources are formally recorded within 0.5 miles of the Project area.

A total of 19 historic built environment resources were identified within 0.5 miles of the Project area. All of these resources have been determined ineligible for listing in the National Register of Historic Places. None of these resources are located within or adjacent to the Project area. A list of these resources is included in Appendix B.

PALEONTOLOGICAL RESOURCES IDENTIFICATION METHODS

The results of the archival research, Natural History Museum of Los Angeles County record search, and an online museum database search are presented below.

ARCHIVAL RESEARCH

Archival research included a consultation of documented paleontological localities held by the Natural History Museum of Los Angeles County (NHMLAC). At the request of Michael Baker International, NHMLAC staff searched its holdings for information regarding documented paleontological resources. Michael Baker International staff supplemented the information received from the NHMLAC with data from museum holdings documented in relevant online databases and a review of the scientific literature.

Natural History Museum of Los Angeles County Results

On July 28, 2025, Michael Baker International staff requested the NHMLAC search its holdings for documented paleontological resources within and near the First and Mountain View Project Site. The NHMLAC responded in a letter dated August 3, 2025 (Appendix C). The records search showed no previously identified fossil localities within the Project area. However, five fossil localities from similar sedimentary deposits to those found within the First and Mountain View Project site occurred, either at the surface or at depth, within 8.5 miles of the Project site (Table 2).

TABLE 2: PREVIOUSLY DOCUMENTED NHMLAC FOSSIL LOCALITIES

Collection Number	Taxa	Formation	Chronological Unit	Distance From Project Site
LACM VP 6370, 6371; LACM IP 17003-17005	Horse (*Equus* sp.), other unspecified mammals; Invertebrates: clam (*Tivela* sp., *Donax* sp., *Lucinisca* sp.), scaphopod (*Dentalium* sp., *Antalis* sp.), marine gastropods (*Glossaulax* sp., *Chlorostoma* sp.)	Terrace deposits (Pleistocene, silty sandstones)	Pleistocene	8.5 miles south
LACM IP 4695	clam (*Saxidomus* sp.), bryozoan (*Bryozoa* indet*., Conopeum* sp.)	Palos Verdes Sand	Pleistocene	5.5 miles southeast
LACM IP 21488	Invertebrates (unspecified)	Unknown formation (Pleistocene; medium to coarse limonitic stained sand)	Pleistocene	5.5 miles south
LACM VP 7657 - 7659	School shark (*Galeorhinus* sp.), eagle ray (*Myliobatus* sp.), goby (*Lipidologist* sp., *Leptocottus* sp.), midshipmen (*Porichthys* sp.*),* croaker (*Seriphus* sp.), flatfish (*Citharichthys* sp.), cusk-eel (*Otophidium* sp.), skate (*Raja* sp,), angel shark (*Squatina* sp.), sculpin (Cottidae)	Unknown Formation (Pleistocene; gray siltstone)	Late Pleistocene	5 miles southwest

Collection Number	Taxa	Formation	Chronological Unit	Distance From Project Site
LACM VP 65113	Mammoth (*Mammuthus* sp.), bison (*Bison* sp.); uncatalogued invertebrates	Unknown formation (Pleistocene)	Pleistocene	2 miles south

Source: Natural History Museum of Los Angeles County
Notes: LACM IP = Natural History Museum of Los Angeles County Invertebrate Paleontology Department Locality
LACM VP = Natural History Museum of Los Angeles County Vertebrate Paleontology Department Locality

ONLINE MUSEUM DATABASE RESULTS

Michael Baker International conducted supplemental paleontological records searches within 5 miles of the First and Mountain View Project area using the following websites:

- University of California Museum of Paleontology Locality Search (University of California Museum of Paleontology 2025)
- San Diego Natural History Museum Collection Database (San Diego Natural History Museum 2025)
- The Paleobiology Database, developed by the Department of Geoscience, University of Wisconsin, Madison (Paleobiology Database [PBDB] 2025)

The PBDB showed one similarly aged locality (PBDB-219852) approximately 5 miles north of the Project area that included one specimen of lanternfish (*Stenobrachius leucopsarum*); however, upon detailed examination of the literature describing the locality, it was found that the location was outside of a reasonable distance from the Project site and is most likely located close to San Pedro or Long Beach, California. Both the University of California Museum of Paleontology and San Diego Natural History Museum online databases did not record any paleontological localities that could definitively be placed within 5 miles of the Project area. Review of available scientific literature found no other examples of fossil specimens collected within similar sediments within 5 miles of the Project area.

LITERATURE, HISTORICAL MAP, AND AERIAL PHOTOGRAPH REVIEW

Michael Baker International reviewed literature, maps, and aerial photographs for historical and archaeological information about the Project area and the vicinity.

Natural Setting

California is divided into 11 geomorphic provinces, each defined by unique geologic and geomorphic characteristics. The Project area is in the Peninsular Ranges geomorphic province, which consists of a series of ranges separated by longitudinal valleys, trending northwest to southeast, subparallel to faults branching from the San Andreas Fault. The trend of topography is similar to the Coast Ranges, but the geology is more like the Sierra Nevada, with granitic rock intruding the older metamorphic rocks. The Peninsular Ranges extend into lower California and are bound on the east by the Colorado Desert. The Los Angeles Basin, and the island group (Santa Catalina, Santa Barbara, and the distinctly terraced San Clemente and San Nicolas islands), together with the surrounding continental shelf (cut by deep submarine fault troughs) are included in this province (CGS 2002).

The geology of the Project site has been mapped by Morton and Miller (2006) and Bedrossian et al. (2012) at a scale of 1:100,000. The mapped geological units at the surface of the site are young alluvial fan deposits. (Qyf) of Holocene to Late Pleistocene age (Bedrossian et al. 2012). Young alluvial fan deposits are described as unconsolidated to slightly consolidated, dissected to slightly dissected boulder, cobble, gravel, sand and silt deposits issued from a confined valley or canyon (Bedrossian et al. 2012). Although alluvial deposits of Holocene age are generally too young for fossilization, sediments that transition to ages greater than 5,000 radiocarbon years old (such as young alluvial fan deposits) are of an age old enough to potentially contain significant fossil resources (Society of Vertebrate Standards [SVP] 2010).

The soils in the Project area are mapped as 68.4 percent Hueneme fine sandy loam, drained, complex, 0 to 2 percent slopes. These soils form on nearly level alluvial fans and originate in discontinuous human-transported material over mixed alluvium derived from sedimentary rock. The remaining 31.6 percent of the Project area's soils are mapped as Metz loamy sand, 0 to 2 percent slopes. These soils form on alluvium derived from mixed materials (NRCS n.d.).

The Project area is located within the Anaheim Bay watershed, which is an 80-square-mile watershed that begins at Anaheim Town Square and includes the entirety of or a portion of 11 cities in Orange County—Santa Ana, Anaheim, Garden Grove, Stanton, Orange, Westminster, Huntington Beach, Cypress, Los Alamitos, Fountain Valley, and Seal Beach—before the watershed meets the Pacific Ocean at Anaheim Bay. The watershed also encompasses parts of the Orange County Flood Control District and unincorporated Orange County, as well as the Bolsa Chica Ecological Reserve and the Seal Beach National Wildlife Refuge (H20C Stormwater Program, n.d.).

The Project area is within the Los Angeles Plain ecoregion, a part of the larger Southern California/Northern Baja Coast ecoregion. The Los Angeles Plain ecoregion consists of nearly level floodplains and terraces, where annual precipitation ranges from 10 to 17 inches. Typical vegetation historically included California sagebrush, California buckwheat, coast live oak, chamise chaparral, and annual grasslands (Griffith et al. 2016).

Prehistoric Context

The prehistoric occupation of Southern California is divided chronologically into four temporal phases or horizons (Moratto 1984). Horizon I, or the Early Man Horizon, began at the first appearance of people in the region (approximately 12,000 years ago) and continued until approximately 5000 BC. One of the oldest archaeological finds in the region is Daisy Cave, on San Miguel Island, where cultural remains have been radiocarbon dated to between 11,100 and 10,950 BC (Moratto 1984). These early occupants of Southern California are believed to have been nomadic large-game hunters whose tool assemblage included percussion-flaked scrapers and knives; large, well-made stemmed, fluted, or leaf-shaped projectile points (e.g., Lake Mojave, Silver Lake); crescentics; heavy core/cobble tools; hammerstones; bifacial cores; and choppers and scraper-planes. Warren (1968) and Wallace (1955) suggest that the absence of milling tools commonly used for seed preparation indicates that an orientation toward hunting continued throughout this phase.

Horizon II, also known as the Millingstone Horizon or Encinitas Tradition, began around 5000 BC and continued until approximately 1500 BC. The Millingstone Horizon is characterized by the widespread use of milling stones (manos and metates) and core tools, with few projectile points or bone or shell artifacts. This horizon represents a diversification of subsistence activities and a more sedentary settlement pattern. Archaeological evidence suggests that hunting became less

critical and that a reliance on collecting shellfish and vegetal resources increased (Moratto 1984: 159). The inland occupants collected primarily hard seeds and hunted small mammals; projectile points were more common in inland assemblages.

A greater emphasis on seed gathering marked the general settlement/subsistence patterns of the Middle Holocene [Horizon II]. Coastal and inland sites exhibit shallow midden accumulations, suggesting seasonal camping, and midden accumulation at desert locales dating to this period is generally rare. Based on the distribution of sites assigned to this period, aboriginal groups likely followed a modified, centrally based wandering pattern, with an inferred shift toward enhanced logistical settlement organization (Warren 1968). In this semisedentary pattern, larger groups occupied a base camp for a portion of the year, while smaller groups used satellite camps to exploit seasonally available floral resources such as grass seeds, berries, tubers, and nuts. King (1967: 66-67) suggests that the coastal sites probably represent more permanent occupations than those found in the interior because coastal inhabitants were sustained by more reliable and abundant food resources.

Horizon III, the Intermediate Horizon or Campbell Tradition, began around 1500 BC and continued until approximately AD 600–800. Horizon III is defined by a shift from the use of milling stones to the increased use of mortar and pestle, possibly indicating a greater reliance on acorns as a food source. Projectile points become more abundant and, together with faunal remains, indicate increased use of both land and sea mammals (Moratto 1984: 159).

Horizon IV, the Late Horizon, which began around AD 600–800 and terminated with the arrival of Europeans, is characterized by dense populations; diversified hunting and gathering subsistence strategies, including intensive fishing and hunting for sea mammals; extensive trade networks; use of the bow and arrow; and a general cultural elaboration (Moratto 1984: 159). All regional chronological sequences recognize the introduction of the bow and arrow at about AD 500 by the appearance of small arrow points and arrow-shaft straighteners. Diagnostic artifacts for the Late Horizon include small triangular projectile points, mortars and pestles, steatite ornaments and containers, perforated stones, circular shell fishhooks, numerous and varied bone tools, and bone and shell ornamentation. Elaborate mortuary customs, generous use of bitumen, and the development of extensive trade networks are also characteristic of this period. Pottery, ceramic pipes, cremation urns, rock paintings, and some European trade goods were added to the previous cultural assemblage during the latter half of the late prehistoric occupation of the Southern California coastal region (Meighan 1954).

Ethnographic Context

This undertaking is located in a region traditionally occupied by the Gabrielino. The term “Gabrielino” is a general term that refers to those Native Americans who were sent by the Spanish to the Mission San Gabriel Arcángel. Two indigenous terms are commonly used by tribal groups to refer to themselves and are preferred by descendant groups: Tongva and Kizh.

Sources of historical information on the Gabrielino include Hugo Reid (1968), Alfred Kroeber (1925), John P. Harrington (1978), Bernice E. Johnston (1962), and C. Hart Merriam (1955).

Prior to European colonization, the Gabrielino occupied a diverse area that included the watersheds of the Los Angeles, San Gabriel, and Santa Ana Rivers; the Los Angeles Basin; and the islands of San Clemente, San Nicolas, and Santa Catalina. Their neighbors included the Chumash and Tataviam to the north, the Juaneño to the south, and the Serrano and Cahuilla to the east. The Gabrielino are reported to have been second only to the Chumash in terms of

population size and regional influence. The Gabrielino spoke a dialect of the Cupan group of the Takic branch of the Uto-Aztecan language family (Bean and Smith 1978: 538-549).

The Gabrielino were hunter-gatherers and lived in permanent communities located near the presence of a stable food supply. Subsistence consisted of hunting, fishing, and gathering. Small terrestrial game was hunted with deadfalls and rabbit drives and by burning undergrowth, while larger game such as deer were hunted using bows and arrows. Fish were taken by hook and line, nets, traps, spears, and poison (Bean and Smith 1978). The primary plant resources were acorns, gathered in the fall and processed in mortars and pestles, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and other sages, various grasses, and islay or holly-leafed cherry. Community populations generally ranged from 50 to 100 inhabitants, although larger settlements may have existed. The Gabrielino are estimated to have had a population numbering around 5,000 in the pre-contact period (Kroeber 1925).

What is usually called the Late Prehistoric period, spanning from approximately 1500 years BP to the mission era (between 1769 and 1833 CE), is the period associated with the florescence of the Gabrielino (Wallace 1955). Coming ashore near Malibu Lagoon or Mugu Lagoon in October 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino.

Gabrielino villages were most common along the coast and along the region's major rivers, where villages formed of domed structures the Spanish likened to half-oranges centered around a temple and the home of the village chief. The resource procurement area claimed by these villages spread around the village center, abutting against the territories of nearby villages. The exact locations of the centers of Gabrielino villages are generally poorly known. The few Spanish or Mexican period maps of the region generally do not show Gabrielino villages. Most of the Los Angeles region was included in land grants, and so never entered the Public Lands System; therefore, it was not surveyed when California was first acquired by the United States, and no early American surveyors mapped villages either. The rapid development of Los Angeles in the nineteenth and twentieth centuries led to the destruction of the villages' archaeological remains. The irregular flow of the area's drainages led to washing away or burying of village sites, and the paving of the same drainages in the middle twentieth century entombed whatever sites were there beneath concrete and rubble. In general, archaeologists and ethnologists rely on American-period historical documents, the oral histories of the Gabrielino themselves, and rare archaeological finds to pinpoint village locations.

Maps and early histories show Gabrielino villages known or suspected to be located in the vicinity of Santa Ana. The *Kirkman-Harriman Pictorial and Historical Map of Los Angeles County, A.D. 1860*, was prepared in 1937 but intended to represent the area as it existed nearly 80 years earlier. The source of the information in this map is unclear, but it has generally been found to be reliable. The map shows a few villages within the vicinity of Huntington Beach, which is the beach city directly west of Santa Ana, as well as one village directly north of the Project area adjacent to Anaheim. These maps do not show any sites within or adjacent to the Project area itself.

Other villages, the names of which are not recorded, no doubt existed throughout the Los Angeles Basin. Smaller settlements, possibly unnamed and lacking a chief's house and ceremonial structure and owing allegiance to a nearby village, likely also peppered the area. The resource procurement areas of these known and unknown villages would have included the immediate vicinity, and the Project vicinity would have been claimed by one or more of these villages depending on trade and political alliances. By the early 1800s, introduced diseases led to population decline, and Spanish use of the land for agriculture and grazing made the Gabrielinos'

reliance on their traditional lifestyle increasingly untenable. The majority of California's coastal Native American populations had entered the mission system by the year 1804 (Jackson and Gardzina 1999).

Historic Context

The following sections identify and summarize historic contexts that are associated with the subject property.

History of Santa Ana

201 S. Mountain View Street is located in the City of Santa Ana. Modern-day Santa Ana owes its existence to William Spurgeon, an itinerant Kentuckian who came to California to partake in the Gold Rush and pivoted to a career in real estate. In 1869, Spurgeon ventured south in search of a suitable location for a new town, eventually arriving in the southeast section of what was then Los Angeles County. Purportedly perturbed by his inability to see beyond the area's dense concentration of native mustard plants, Spurgeon scaled a sycamore tree to survey the area and subsequently purchased 74 acres of land, about 8 miles south of the town of Anaheim and about 2 miles east of the Santa Ana River. He named the town Santa Ana, constructed a house and general store, opened a post office, and commissioned a survey of the nascent town that was originally bounded by 1st, 7th, Spurgeon, and West (now Broadway) Streets (Emmons 2001).

In 1875, the Southern Pacific Railroad opened a rail line between Los Angeles and Anaheim and expressed interest in extending the line farther south. Aware of the railroad's tremendous potential to influence development, Spurgeon and a group of monied local investors offered Southern Pacific a litany of concessions—including right-of-way, 90 acres of real estate, and $10,000 cash—in exchange for selecting Santa Ana as the southern terminus of the extended rail line. This effort proved fruitful: Southern Pacific constructed a rail depot in Santa Ana in 1877, and the first locomotives arrived later that year (Brigandi 2019). Arrival of the railroad played a pivotal role in putting Santa Ana on the map; it also came at the expense of nearby Tustin, which had also lobbied for a railroad connection but was bypassed, leaving its founder, Columbus Tustin, a "bitterly disappointed man" (City of Tustin, n.d.). In 1887, a second rail line was completed to Santa Ana via Riverside by the competing Atchison, Topeka, and Santa Fe Railroad (Lovret 2007).

By the turn of the twentieth century, Santa Ana had shed its roots as a peripheral outpost and had matured into a regional urban center. The town incorporated in 1886, and in 1889, when the southeast corner of Los Angeles County broke away to become Orange County, Santa Ana was anointed the county seat—this time, at the expense of the nearby City of Orange (*Los Angeles Times* 1976). In 1905, the Los Angeles Interurban Railway—a forebear to the Pacific Electric Railway—opened a 35-mile electric streetcar line between downtown Los Angeles and Santa Ana, which improved connectivity between the two cities and further stimulated Santa Ana's growth (Bowers Museum 2022). Indeed, Santa Ana's population increased manifold in the early decades of the twentieth century, from 8,429 in 1910, to 15,485 in 1920, and to 30,322 in 1930 (OC Almanac, n.d.). The city was anchored by a monumental courthouse that was the hub of county government and a business district that was centered around Fourth and Main Streets and spanned multiple city blocks.

Agriculture was the linchpin of Santa Ana's economy prior to World War II. Its fertile hinterlands were used to grow various crops including sugar beets, lima beans, celery, walnuts, berries, and oranges. These crops were harvested and sent to area packinghouses, where they were then

loaded onto trains and shipped to market (Masters 2012). During World War II, the military also became an important economic engine as multiple military bases were activated in Orange County, including the El Toro Marine Corps Air Station near Irvine, the Santa Ana Army Air Base in what is now Costa Mesa, and naval training and weapons facilities in Seal Beach and Los Alamitos. Many of those who were stationed at these bases returned to the Santa Ana area after the war to set down roots and take advantage of low-cost home loans provided to them under the G.I. Bill (Orange County Historical Society, n.d.).

Santa Ana was well positioned to grow rapidly after World War II. The City had an established presence and population base, was centrally located at the heart of Orange County, and was readily accessible from Los Angeles and other destinations. It was also surrounded by agricultural land that was suited to the development of residential tracts and was located along the route of the Santa Ana Freeway (Interstate 5), which was completed to Santa Ana in 1955 (Architectural Resources Group 2021: 108). The population of Santa Ana was 45,533 in 1950, 100,350 in 1960, and 155,710 in 1970 (OC Almanac, n.d.), and dozens of annexations in the postwar period pushed its boundaries further out into the emerging suburban periphery. In 1969, more than four square miles on the west side of the Santa Ana River were annexed by Santa Ana in what was one of the largest and most contentious annexations in the City's history (*Los Angeles Times* 1969).

The City also witnessed significant demographic shifts after World War II. In 1965, President Lyndon B. Johnson signed into law the Immigration and Nationality Act, legislation that abolished national origin quotas—which favored western and northern European nations—in exchange for a more equitable immigration system that led to an uptick in immigration from countries in Asia, Africa, and Latin America (Kammer 2015). Many of those who came to Southern California from Mexico at this time settled in Santa Ana due to its affordable housing stock, proximity to jobs that relied on immigrant labor, and the presence of an existing Latino community that fostered social ties and offered a support network to new arrivals. Simultaneously, the number of white residents in Santa Ana dropped as many of the City's white families increasingly moved away to new suburban communities. By 1980, 41 percent of Latino immigrants in Orange County lived in Santa Ana, and by 1986 the City's population was 62 percent Latino (Haas 1995: 256).

By 1990, Santa Ana had the highest percentage (65 percent) of Latino residents of any major California city, surpassing Los Angeles (40 percent), and Anaheim (30 percent) (Eng and Schwartz 1991). Santa Ana continues to be an epicenter of Latino community and culture, centered around the Fourth Street corridor, which is now flanked by largely Latino-owned businesses and is referred to within the community as *Calle Cuatro* (Carcamo 2016). A streetcar line connecting transportation and employment centers in downtown Santa Ana with a bus line in nearby Garden Grove is under construction and is expected to open in 2026 (Orange County Transportation Authority, n.d.).

Mobile Kitchens and Catering Trucks

201 S. Mountain View Street was built as a support facility for mobile catering trucks. The practice of preparing food from a mobile kitchen dates to the nineteenth century. In 1866, Texas rancher Charles Goodnight invented the chuckwagon to feed cowboys herding cattle in remote areas for extended periods of time, often months on end. Goodnight took a surplus Army wagon and converted it into a mobile kitchen, adding a pantry box, storage for cooking implements, and a hinged door that laid flat to create a table. The average chuckwagon was staffed by a "cookie," often an ex-cowboy, who not only prepared three square meals per day but was also tasked with driving the wagon, setting up camp, and serving as de facto doctor, dentist, barber, banker, or other jobs that were needed on the trail. Food served from chuckwagons included items that were

easy to preserve including beans, rice, dried and salted meats, sourdough biscuits, onions, potatoes, and coffee. Chuckwagons also typically carried water barrels, fuel, and other equipment and vital supplies (National Park Service 2021).

In 1872, Rhode Islander Walter Scott pioneered a similar concept called the "lunch wagon," which catered to workers in many northeastern cities during the Industrial Revolution. These workers often had grueling schedules and did not end their shifts until late at night, by which time restaurants were closed. Scott's invention consisted of a horse-drawn freight wagon that he converted into a mobile eatery, which sold hot coffee, sandwiches, pie, and other light fare. He parked his retrofitted wagon outside the offices of the *Providence Journal* at night and attracted a crowd of late-shift newsmen (Gutman 1993: 14). Others took Scott's idea and further finessed it, resulting in purpose-built lunch wagons that became a ubiquitous element of industrializing American cities (Engber 2014).

The advent of the automobile in the early twentieth century made it easier for vendors to sell food outside the traditional confines of a brick-and-mortar restaurant. What is often cited as the first example of a food truck was the ice cream truck, which was introduced by Ohio confectioner Harry Burt in 1920. Burt, who had developed an ice cream bar encased in a chocolate shell and affixed to a stick, purchased a fleet of refrigerated trucks to sell his product—called Good Humor Bars—directly to customers on the street (Sheldon 2025).

Mobile canteens, or cold trucks—refrigerated trucks that sold pre-made sandwiches and other pre-packaged items that could be kept over ice—could be found on the streets of many American cities as early as the 1920s. Mobile canteens would typically travel to factories and construction sites during lunch hours to serve blue-collar workers, many of whom had no other option but to bring their own meal from home. The number of mobile canteens increased after World War II as the American economy grew, and the trucks provided quick and affordable meals to an expanding industrial and office workforce in the post-World War II period (Gepfert 1978).

Some vendors adapted food trucks so that they could prepare hot meals directly from the vehicle. Known as catering trucks, or hot trucks, they are believed to have originated in Los Angeles County in the 1960s (Gepfert 1978). Hot trucks were distinguished from cold trucks from their inclusion of full-service, on-site kitchens with sinks, deep fryers, ovens, grilles, refrigerators, and freezers. Hot trucks were typically staffed with both a driver and cook on board. Popular menu items included hamburgers, egg sandwiches, burritos, and other items that could be quickly prepared. These hot trucks were often hazardous for workers, lacked hot and cold running water, and had questionable sanitation practices, which earned them the pejorative nickname of "roach coach" (Belcher 1987). They were detested by the owners of cold trucks and traditional restaurants, which saw their rise as posing an existential threat (Vida 1982).

In 1974, restauranteur Raul Martinez converted an old ice cream truck into a hot truck serving soft-shell tacos in East Los Angeles. Known as King Taco, Martinez's endeavor is widely considered to be the nation's first example of a taco truck—a type of mobile kitchen that has since become ubiquitous in Southern California and has expanded to other cities across the nation (Hernandez 2024).

Food trucks suffered from a dismal reputation based on perceptions of quality and sanitation, but this changed in the early 2000s when street food vendors sought to elevate their standing. In 2005, the first annual Vendy Awards were hosted in New York City to honor street vendors (Bowen 2005). Three years later in 2008, maverick chef Roy Choi opened the Kogi taco truck in Los Angeles, which prepared Korean-Mexican fusion fare and was a major moment in

gastronomic history. Perhaps more than any other restauranteur of his era, Choi is credited with elevating the food truck experience by providing quality and inventive street food (Gelt 2009).

Food Truck Commissaries

The subject property was purpose-built as a food truck commissary, a common commercial property type associated with the operation of mobile kitchens and food trucks.

Food truck commissaries are shared facilities that support the logistical operations of food truck operators and serve as their home base. A typical food truck commissary includes a multitude of amenities: wholesale grocery sales, commercial kitchens for food preparation, off-street overnight parking, electrical hookups, grease and wastewater disposal, dry and cold food storage lockers, truck washing and maintenance facilities, ice and propane refills, and administrative support. Essentially, commissaries accommodate back-of-house operations that cannot be completed within the limited square footage of the truck itself. Many jurisdictions require food truck operators to belong to a commissary to comply with public health regulations and avoid parking overnight on public streets (Hebert 2025; Peña 2013).

Food truck commissaries began appearing in American cities in the 1970s, when hot food trucks were becoming increasingly popular. Commissaries are typically located in urban areas zoned for commercial or light industrial use; are anchored by a central building that houses administrative offices, grocery and kitchen facilities, and food storage lockers; and include paved surfaces that are used for truck parking, maintenance, and waste disposal. Excluding the subject property, there are currently six operational food truck commissaries in Orange County, including three in Santa Ana, two in Anaheim, and one in Irvine (OC Health Care Agency, n.d.).

Development of 201 S. Mountain View Street

Building permits on file with the City of Santa Ana indicate that 201 S. Mountain View Street was constructed in 1977 as a commercial catering truck support facility. The property originally included a supply/office building, one ice house structure, and a parking lot. The property was built by Charlie Akoboff (1930–2014), who owned a commissary that operated under the names Charlie's Hot Lunch, Charlie's Foods, and CA Foods. In 1983, the subject property was expanded to include a vacant property to the north, and in 1996 an existing building at the southeast corner of 1st and Mountain View Streets was demolished to accommodate a second expansion of the subject property. The commissary at 201 S. Mountain View Street closed in 2024.

INTERESTED PARTIES CONSULTATION

Native American Consultation

The NAHC maintains a confidential Sacred Lands File, which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on July 24, 2025, to request a search of the Sacred Lands File for the Project area.

The NAHC responded to the request in a letter dated August 6, 2025, stating, "The result of the Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any Project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites." The NAHC also provided a contact list of Native American tribes that are traditionally and culturally affiliated with the geographic area of the Project who may also have knowledge of resources in the Project area.

PEDESTRIAN SURVEY

On August 6, 2025, Andrew Goodrich, an architectural historian with Michael Baker International, and Marcel Young, an archaeologist with Michael Baker International, conducted an intensive built environment survey of the Project area and recorded resources in the field with written notes and digital photos **(Photographs 1-4)**. An archaeological survey was not completed as the parcel has been completely developed.

RESOURCE DESCRIPTION

201 S. Mountain View Street is located at the southeast corner of 1st and Mountain View Streets in Santa Ana. The subject property was historically used as a food truck commissary. At the south end of the subject property is a two-story commercial building that was built in 1977 and used as a commissary and offices for a commercial food truck business. The building is utilitarian in style, is roughly rectangular in plan, and is constructed of concrete masonry units (CMU). It is capped by a flat roof with rolled asphalt sheathing, a flat slab eave, and raised parapets. Exterior walls are unfinished and consist of exposed concrete blocks. The primary façade **(Photograph 1)** faces north and contains the main entrance, which consists of paired, solid metal doors. Other features on the primary façade include a metal canopy with metal post supports, and three secondary entrances comprising solid metal and wood doors. The west façade includes two secondary entrances comprising solid metal doors, and a small utility enclosure with chain link fencing. The east façade features a one-story trapezoidal volume with a garage bay and metal doors **(Photograph 2)**. The south façade abuts the rear (south) property line and consists of an unarticulated CMU wall. Fenestration is minimal and consists of sliding aluminum windows; one window is infilled, and two are affixed with metal security bars.

There are multiple ancillary structures associated with 201 S. Mountain View Street. At the southeast corner of the property is a shed structure with a corrugated metal canopy and steel posts and trusses. This structure was used to wash and service catering trucks. Near the center of the property are two detached ice structures that were used to store and distribute ice to the catering trucks that docked on site. Each ice structure is constructed of CMU and has an overhead wood catwalk and operable metal hatches **(Photograph 3).** At the west entrance to the property is a guard shack structure with a shed roof and glazing. Storage sheds are installed at various points along the north property line.

Most of 201 S. Mountain View Street is paved with concrete. Metal docking stations are installed at various points in the paved lot; they provided docked trucks with hookups and conduits for utilities **(Photograph 4)**. The paved lot is illuminated by metal light posts installed on cylindrical concrete bases. Access to the property is granted by two driveways, one facing north (toward 1st Street) and a second facing west (toward Mountain View Street); the guard shack is located at the west entrance. The property is surrounded by a CMU perimeter wall and a landscaped buffer that includes manicured shrubs and mature podocarpus and ficus trees.

A DPR 523 series Primary Record form and Building, Structure, and Object Record form were completed for 201 S. Mountain View Street. These forms are available in **Appendix D**.



Photograph 1: Supply building, primary façade (north), view facing south, August 6, 2025.



Photograph 2: Supply building, east and north façades, view facing southwest, August 6, 2025.



Photograph 3: Ice structure, south and east façades, view facing northwest, August 6, 2025.



Photograph 4: Surface parking lot and docking station, view facing west, August 6, 2025.

PALEONTOLOGICAL SENSITIVITY ANALYSIS

In support of the Project, Michael Baker International reviewed available geological, geographical, and paleontological resources pertaining to the Project area in online government and museum databases, conducted a paleontological pedestrian survey of the Project area, and requested a NHMLAC Paleontological Database records search for the Project area and surrounding 5-mile radius to determine whether the Project could result in an adverse effect to paleontological

resources potentially underlying the Project area that are protected by federal and state regulations. Methods, results and recommendations are summarized below.

Per mitigation impact guidelines set forth by the Society of Vertebrate Paleontology (SVP 2010), due to the fossil sensitivity of the rock formations present within the Project area (Holocene to Late Pleistocene age young alluvial fan deposits), there is a high potential to disturb paleontological resources within undisturbed geologic contexts (i.e., undisturbed bedrock or subsurface geologic deposits in previously undisturbed areas) within the Project area. No paleontological resources are documented within the Project area, but significant vertebrate and invertebrate fossil localities have been recovered from geologic formations of similar age (Pleistocene) and depositional environments within 9 miles of the Project area. Due to the vertebrate and invertebrate fossils found in geologic units similar to those underlying the Project area, the rock units presently underlying the site have a high sensitivity for paleontological resources at all depths due to its unknown geology. A geotechnical study of the Project site must be completed if constraints of sensitivity are to be made beyond those stated above. These recommendations are based on the SVP (2010) guidelines.

BURIED ARCHAEOLOGICAL SITE SENSITIVITY ANALYSIS

The soils of the Project area have been heavily impacted by modern development upon the surface and in the near-surface sediments. Known disturbances within the Project area include activities related to the development of a commercial building in the southern portion of the Project area in 1977. The activities involved in these disturbances include clearance, grading, excavation, landscaping, and associated utilities. These disturbances are significant and extend to unknown depths.

Results of the SCCIC records search and literature review indicated that no prehistoric archaeological sites or isolated artifacts are present within the Project area or the half-mile search radius. There are 19 historic built environment resources within the half-mile radius of the Project area and all of the resources are ineligible for listing in the National Register of Historic Places. No archaeological resources were identified within the Project area during the field survey. The NAHC results were likewise negative. Soil mapping indicates the Project area consists of 68.4 percent Hueneme fine sandy loam and 31.6 percent Metz loamy sand. These relatively young alluvial deposits have the potential to conceal buried archaeological deposits; however, urban soils typically include a layer of artificial fill and heavily disturbed soils at least 50 centimeters thick (Craul 1992).

The archaeological sensitivity for prehistoric archaeological sites within the three-dimensional Project area is low given the developed and the disturbed nature of the Project area, which would have impacted intact sediments. The sensitivity for potential undocumented historic-period archaeological sites is also low based on the known history of the Project area. However, the sensitivity for buried prehistoric resources increases with depth, as excavations exceed the depths of recent disturbance.

The majority of the proposed field improvement activities will take place within existing previously disturbed soils. Therefore, based on soils and taking into account the Project area's previous disturbance, the Project area's buried site sensitivity is low at the surface and within the maximum depth of disturbance, which is estimated to be 3 feet below grade. Sensitivity may increase below the maximum depth of disturbance in areas where previously undisturbed native soils may be

encountered, and the Project area's sensitivity should be reassessed if deeper excavations are required.

EVALUATION OF ELIGIBILITY

California Register of Historical Resources

The following includes an evaluation of 201 S. Mountain View Street against eligibility criteria for the California Register of Historical Resources.

California Register Criterion 1

Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

201 S. Mountain View Street was purpose-built as a food truck commissary in 1977 and is broadly associated with the rising popularity of food trucks during the later decades of the twentieth century. However, research did not suggest that the subject property is historically significant within this context. The subject property was one of many such facilities that were built in urban communities across Southern California to support the logistical needs of food truck operators. Its construction does not appear to have represented a momentous occasion in the evolution of gastronomic culture in Southern California and elsewhere, but was rather a common reaction to this broad pattern of commercial development and consumer habits. In addition, research did not indicate that the subject property is associated with a singular event of historical significance. Since its construction in 1977, the subject property appears to have operated as nothing other than a typical food truck commissary.

For these reasons, 201 S. Mountain View Street does not meet the significance threshold for listing under California Register Criterion 1.

California Register Criterion 2

Is associated with the lives of persons important in our past.

201 S. Mountain View Street was built for and operated by Charlie Akoboff, who operated a food truck commissary that was alternatively known as Charlie's Hot Lunch, Charlie's Foods, and CA Foods. Research did not produce information indicating that Akoboff was a historically significant individual in the spirit of this criterion. Aside from owning and operating a successful food truck commissary, Akoboff does not appear to have made significant contributions to history. Rather, he appears to have been one of many entrepreneurs that built their business around the rise of food trucks in the late twentieth and early twenty-first centuries.

For these reasons, 201 S. Mountain View Street does not meet the significance threshold for listing under California Register Criterion 2.

California Register Criterion 3

Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

201 S. Mountain View Street contains one building and multiple ancillary structures that were constructed between 1977 and 1983. The property is utilitarian and lacks the distinctive characteristics of an architectural style or period. Buildings on the subject property are constructed

of concrete block—a very common construction type that was used because of its efficiency and economy. There is nothing distinctive about this method of construction.

201 S. Mountain View Street was constructed as a food truck commissary and exhibits some characteristics of this type: a commercial or light industrial setting, a central support/office building, paved surface parking, and ancillary structures that supported the operations of local food truck operators. However, the subject property is neither distinctive nor unique in this respect. As noted, there are six other food truck commissaries in Santa Ana and many more throughout Southern California, all of which exhibit the same essential characteristics. 201 S. Mountain View Street reads as a representative example of a food truck commissary, and not as a distinctive or significant example of this property type.

The architect of record for 201 S. Mountain View Street is D. L. Hayes and Associates of Santa Fe Springs, which was headed by architect Don L. Hayes. Research uncovered scant information about the firm and its principal, indicating that Hayes is not a "master" in the spirit of this criterion.

201 S. Mountain View Street does not represent a significant distinguishable entity whose components may lack individual distinction. It is located in an area of Santa Ana that contains an assortment of land uses and property types including single-family houses, multifamily residential properties, and commercial strip malls. None of these uses relate to one another in a meaningful way.

For these reasons, there is insufficient evidence indicating that 201 S. Mountain View Street is a significant example of an architectural style, type, period, or method of construction; or represents the work of a master; or possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction. Therefore, 201 S. Mountain View Street does not meet the significance threshold for California Register Criterion 3.

California Register Criterion 4

Has yielded, or may be likely to yield, information important in prehistory or history.

It is unlikely that 201 S. Mountain View Street has the potential to yield valuable information which will contribute to our understanding of human history because the property is not and never was the principal source of important information pertaining to significant events, people, architectural style, or building technology. Since the subject property has been extensively graded and developed, its potential to contain subsurface archaeological resources is nominal.

For these reasons, 201 S. Mountain View Street does not meet the significance threshold for listing under California Register Criterion 4.

Local (Santa Ana) Designation Criteria

Following is an evaluation of 201 S. Mountain View Street against criteria for the local (Santa Ana) historic resource register, which are listed in Section 30-2 of the Santa Ana Municipal Code. To be eligible for local designation, a resource must be at least 50 years of age and must also meet at least one of the Santa Ana criteria.

Santa Ana Criterion 1

Buildings, structures, or objects with distinguishing characteristics of an architectural style or period that exemplify a particular architectural style or design feature.

As discussed in the evaluation against California Register Criterion 3, 201 S. Mountain View Street is a utilitarian improvement that does not embody distinguishing characteristics of an architectural style or period. For these same reasons, 201 S. Mountain View Street does not meet the significance threshold for listing under Santa Ana Criterion 1.

Santa Ana Criterion 2

Works of notable architects, builders, or designers whose style influenced architectural development.

As discussed in the evaluation against California Register Criterion 3, 201 S. Mountain View Street was designed by the architectural firm of D. L. Hayes and Associates of Santa Fe Springs, and there is insufficient evidence indicating that this firm or its personnel are regarded as masters. For these same reasons, 201 S. Mountain View Street does not meet the significance threshold for listing under Santa Ana Criterion 2.

Santa Ana Criterion 3

Rare buildings, structures, or objects or original designs.

201 S. Mountain View Street is not a rare structure, building, or object or an original design. As noted, there are six other operational food truck commissaries located in Orange County, three of which are located within the Santa Ana city limits. There are numerous other commissaries in the region. Therefore, 201 S. Mountain View Street is not rare and does not meet the significance threshold for Santa Ana Criterion 3.

Santa Ana Criterion 4

Buildings, structures, objects or sites of historical significance which include places: (a) where important events occurred; (b) associated with famous people, original settlers, renowned organizations and businesses; (c) which were originally present when the city was founded; and (d) that served as important centers for political, social, economic, or social activity.

As discussed in the evaluation against California Register Criterion 1, 201 S. Mountain View Street is not associated with historical events, patterns of events, or people. In addition, the subject property was constructed in 1977 and was not present when the City was founded. For these reasons, 201 S. Mountain View Street does not meet the significance threshold for Santa Ana Criterion 4.

Santa Ana Criterion 5

Sites of archaeological importance.

As discussed in the evaluation against California Register Criterion 4, 201 S. Mountain View Street does not appear to be a site of archaeological importance. For these same reasons, 201 S. Mountain View Street does not meet the significance threshold for Santa Ana Criterion 5.

Santa Ana Criterion 6

Buildings or structures that were connected with a business or use which was once common, but is now rare.

201 S. Mountain View Street is not connected with a business or use which was once common but is now rare. As noted above, 201 S. Mountain View Street is one of seven food truck

commissaries in Orange County and among dozens of like properties in Southern California, all of which serve the same essential purpose and embody the same physical characteristics. Food truck commissaries are not rare, either locally or regionally. Therefore, 201 S. Mountain View Street does not meet the significance threshold for Santa Ana Criterion 6.

Conclusion

201 S. Mountain View Street does not meet eligibility criteria for listing in the California Register of Historical Resources, or local (Santa Ana) designation, and does not meet the definition of a historical resource under CEQA.

THRESHOLDS OF SIGNIFICANCE

HISTORICAL RESOURCES

A project has a significant impact on cultural resources if it causes a "substantial adverse change" in the significance of a historical or archaeological resource, as defined in Guidelines Section 15064.5. Significant impacts include physical demolition, destruction, relocation, or alteration of a resource—including its immediate surroundings—that reduces its integrity or eligibility for listing on the California Register.

PALEONTOLOGICAL RESOURCES

The significance thresholds used to evaluate the impacts of the planned Project related to geological (paleontological) resources are based on Appendix G of the CEQA Guidelines.

Based on Appendix G, a project would have a significant impact related to paleontological resources if it would:

- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature pursuant to CEQA Guidelines Appendix G.

SUMMARY OF FINDINGS AND RECOMMENDATIONS

HISTORICAL RESOURCES

The SCCIC records search, literature review, field survey, and NAHC Sacred Lands File search identified one cultural resource (former food truck commissary) within the Project area. The resource was evaluated and recommended ineligible for inclusion in the California Register of Historical Resources. The archaeological sensitivity analysis identified low sensitivity for prehistoric and historic-period archaeological resources; however, the sensitivity for buried prehistoric resources increases with depth, as excavations exceed the depths of recent disturbance. Therefore, no further management is recommended. A finding of no impact to historical resources under CEQA is appropriate for the Project.

PALEONTOLOGICAL RESOURCES

A finding of less than significant impact with mitigation to paleontological resources under CEQA is appropriate for the Project. As documented above, there are no documented fossil localities within the First and Mountain View Project area. However, due to the fossil sensitivity of the sediments present within the Project area (Holocene to Late Pleistocene-aged young alluvial fan

deposits) and prior records of Pleistocene-aged vertebrate and invertebrate fossils found throughout the region, proposed development for this Project has a high potential to disturb paleontological resources within undisturbed alluvium (older than 5,000 years; SVP 2010) and geologic contexts (i.e., undisturbed bedrock or subsurface geologic deposits in previously undisturbed areas). Implementing a Mitigation Measure Plan for paleontology would reduce impacts to these resources, if any, to a less than significant level.

Paleontological Impact Mitigation Measure Plan

The following are measures recommended to reduce impacts to paleontological resources:

PALEO-1: Initial Project Review

Prior to the beginning of construction activities that may impact undisturbed native Holocene to Pleistocene-aged soil and bedrock (including but not limited to geotechnical boring, initial vegetation removal, clearing and grubbing, mass grading, boring, excavating, digging, trenching, rig anchor installation, drilling, boring/tunneling, auguring, blasting, topsoil stripping, land leveling, driving a ground rod, fencing and hydrovac excavating), the City of Santa Ana shall retain a Society of Vertebrate Paleontology-qualified paleontologist. The qualified paleontologist shall review the proposed scope of work, excavation plans against the data, and the analysis in this memorandum to determine the potential to impact paleontological resources.

If the ground-disturbing activity will not impact paleontological resources, then no further work is necessary, and Mitigation Measures PALEO-2 and PALEO-3 do not apply.

PALEO-2: Paleontological Monitoring

As determined by the Society of Vertebrate Standards (SVP)-qualified paleontologist in consultation with the City, paleontological monitoring shall be required for all ground-disturbing activities that may impact undisturbed native Holocene to Pleistocene-aged soil and bedrock at any depth. The qualified paleontologist shall attend preconstruction meetings, as deemed necessary by the paleontologist in consultation with the City, and manage the paleontological monitor(s) if the qualified paleontologist is not conducting the monitoring. The paleontological monitor shall maintain logs and provide a final summary report of all ground-disturbing activities monitored with the potential to disturb paleontological resources.

The level of monitoring may range from full-time or part-time (spot-check), based on the qualified paleontologist's review of plans and on-site observations. If no significant fossils are recovered after 50 percent of earth-moving activities has been completed, full-time monitoring may be modified or reduced at the discretion of the qualified paleontologist. If the qualified paleontologist determines during the course of earth-moving activities that Project excavations are located within fill or previously disturbed soils, or that the sensitivity for significant paleontological resources is otherwise low, monitoring may be reduced or suspended at the qualified paleontologist's discretion. The determination to reduce or discontinue paleontological monitoring in the Project area shall be based on the professional opinion of the qualified paleontologist regarding the potential for fossils to be present after a reasonable extent of the geology and stratigraphy has been evaluated.

Monitoring shall be conducted in person by a qualified paleontological monitor as stated in the SVP 2010 guidelines. The monitor shall take photographs, and write a daily log which describes work monitored, depth, conditions, findings, etc., for the day. These logs shall be collected daily

or weekly and compiled into the Project monitoring report at the end of the Project. If multiple areas of the Project site are being impacted at the same time, multiple monitors may be required in order to fulfill the mitigation measures that reduce impacts to these resources, if any, to a less than significant level.

In the event that fossils are discovered during grading at any depth, the on-site construction supervisor shall be notified immediately and shall redirect work away from the location of the discovery. The contractor shall consult with the qualified paleontologist to assess the significance of the find in accordance with SVP standards. If any find is determined to be significant, appropriate avoidance measures recommended by the qualified paleontologist and approved by the City shall be followed. If avoidance is unnecessary or infeasible, then Mitigation Measure PALEO-3 shall be implemented. The recommendations of the paleontologist shall be implemented with respect to the evaluation and recovery of fossils, after which the on-site construction supervisor shall be notified and shall direct work to continue in the location of the fossil discovery.

If any find is determined not to be significant, then work shall proceed and Mitigation Measure PALEO-3 would not apply.

PALEO-3: Data Recovery Plan

If the fossils are determined to be significant, then the Society of Vertebrate Paleontology-qualified paleontologist shall prepare and implement a data recovery plan. The plan shall generally detail the nature and purpose of the paleontological investigation. The plan shall incorporate resource context, appropriate field methods for data collection depending on the type of fossils found, and detail how the fossils will be prepared, cleaned, identified, catalogued, temporarily housed, and permanently curated with an appropriate institution with a research interest in the materials (which may include the Natural History Museum of Los Angeles County or the John D. Cooper Center in Santa Ana). The qualified paleontologist shall ensure that curation of fossils is completed in consultation with the City. A letter of acceptance from the curation institution shall be submitted to the City.

Ground-disturbing construction activities may commence once excavations are completed in accordance with the data recovery plan and to the satisfaction of the City in consultation with the qualified paleontologist. However, the data recovery work shall not be considered complete until excavations and associated analyses are completed and a final report is prepared. The report shall be completed and presented to the City for comment within 18 months of the completion of excavations.

PALEO-4: Worker Environmental Awareness Program

As determined by the Society of Vertebrate Paleontology (SVP)-qualified paleontologist in consultation with the City of Santa Ana, and prior to the beginning of the earth-moving construction activities (including but not limited to geotechnical boring, initial vegetation removal, clearing and grubbing, mass grading, boring, excavating, digging, trenching, rig anchor installation, drilling, boring/tunneling, auguring, blasting, topsoil stripping, land leveling, driving a ground rod, fencing and hydrovac excavating), the construction crew(s) shall be informed on how to identify paleontological localities, such as fossils, and of the regulatory protections afforded those resources by a SVP-qualified paleontologist. The crew(s) shall also be informed of procedures relating to the discovery of unanticipated paleontological resources. The crew(s) shall be cautioned not to collect fossils, and directed to inform a construction supervisor and the on-site paleontological monitor, if available, in the event that paleontological resources are discovered

during the course of construction. The qualified paleontologist shall administer supplemental briefings to all new construction personnel, prior to their commencement of earth-moving construction activities. This mitigation measure can be administered in conjunction with other construction worker environmental awareness programs for the same project.

PREPARER QUALIFICATIONS

This memorandum was prepared by Michael Baker International Senior Archeologist Paige Kohler, MA, RPA, and Senior Architectural Historian Andrew Goodrich, AICP, and cultural staff member Marcel Young performed the survey. The memorandum was reviewed for quality control by Senior Architectural Historian Susan Wood, PhD, and Senior Archaeologist Marc Beherec, PhD, RPA.

Paige Kohler, MA, RPA, is a senior archaeologist with more than 10 years of experience in prehistoric and historical archaeology and cultural resources management. Her experience includes writing technical reports, including National Environmental Policy Act, National Historic Preservation Act, and CEQA compliance documents. She has supervised and managed all phases of archaeological fieldwork, including survey and archaeological construction monitoring at sites throughout Southern California. She meets the Secretary of the Interior's Professional Qualification Standards for prehistory and historical archaeology and is listed in the Register of Professional Archaeologists.

Andrew Goodrich, AICP, is a senior architectural historian with 15 years of experience in historic preservation planning and cultural resources management in California. He meets the Secretary of the Interior's Professional Qualification Standards in the discipline of architectural history. He is a seasoned researcher and technical writer whose experience includes historic resource evaluations, historic context statements and surveys, archival research, nominations to the National Register of Historic Places and local registers, rehabilitation incentives including the Mills Act, Secretary of the Interior's Standards compliance, CEQA technical reports, and project management. He also has prior experience working for public and nonprofit sector preservation agencies and is an AICP-certified planner.

Peter Kloess, PhD, is a principal paleontologist who meets SVP standards for a qualified paleontologist. He has over 20 years of experience in paleontology. His experience includes public and private consultation, field monitoring, excavation, and laboratory research on projects across the western United States, predominantly in California. He has consulting experience with a range of projects, including utility, transmission, construction, transportation, monitoring, and surveys. Additionally, he has recovered a diversity of fossils from project sites, such as invertebrates, small mammals and birds, large mammals, and dinosaurs. Dr. Kloess also has extensive experience in paleontological museum collections and lab settings, including in roles such as assistant curator, co-leader and participant in excavations across California, Utah, New Mexico, and Montana, and specimen preparator. Dr. Kloess has researched, written, and published research articles in scientific journals.

Tara Kloess is an associate paleontologist and geologist with over 15 years of experience in the field of paleontology. With multiple years of field, technical, and laboratory experience, she has accrued extensive knowledge managing, fielding, and reporting for paleontology mitigation projects and conducting paleontological research, fossil salvage, and documentation in accordance with state and federal regulations on fossil preservation and mitigation. Her major interests in the field include California Pliocene and Pleistocene megafauna, whale evolution, and

environmental reconstruction through sediment stratigraphy. Her strengths include mammalian bone identification, geologic unit identification and fossil collection and preservation methods including fossil jacketing and transport. She has worked on dozens of consulting projects within both the public and private sectors including housing development, Caltrans, PG&E, Southern California Edison, East Bay Municipal Utility District, and other local, state and federal contractors. She has experience recovering a diversity of fossils from project sites across California. She meets the SVP standards for a paleontological resource monitor.

Sincerely,

Paige Kohler, MA, RPA
Senior Archaeologist

Andrew Goodrich, AICP
Senior Architectural Historian

Attachments:
Appendix A – Figures
Appendix B – Records Search Results (Confidential)
Appendix C – NHMLAC Record Search Results
Appendix D – DPR 523 Series Forms

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Appendix A
Figures



PN: 208279 \\Santca1hub\irvica1fs1\HROOT\data\208279\Admin\Reports\Environmental\Technical Studies\Cultural\08_GIS

Legend

Project Location

FIRST AND MOUNTAIN VIEW

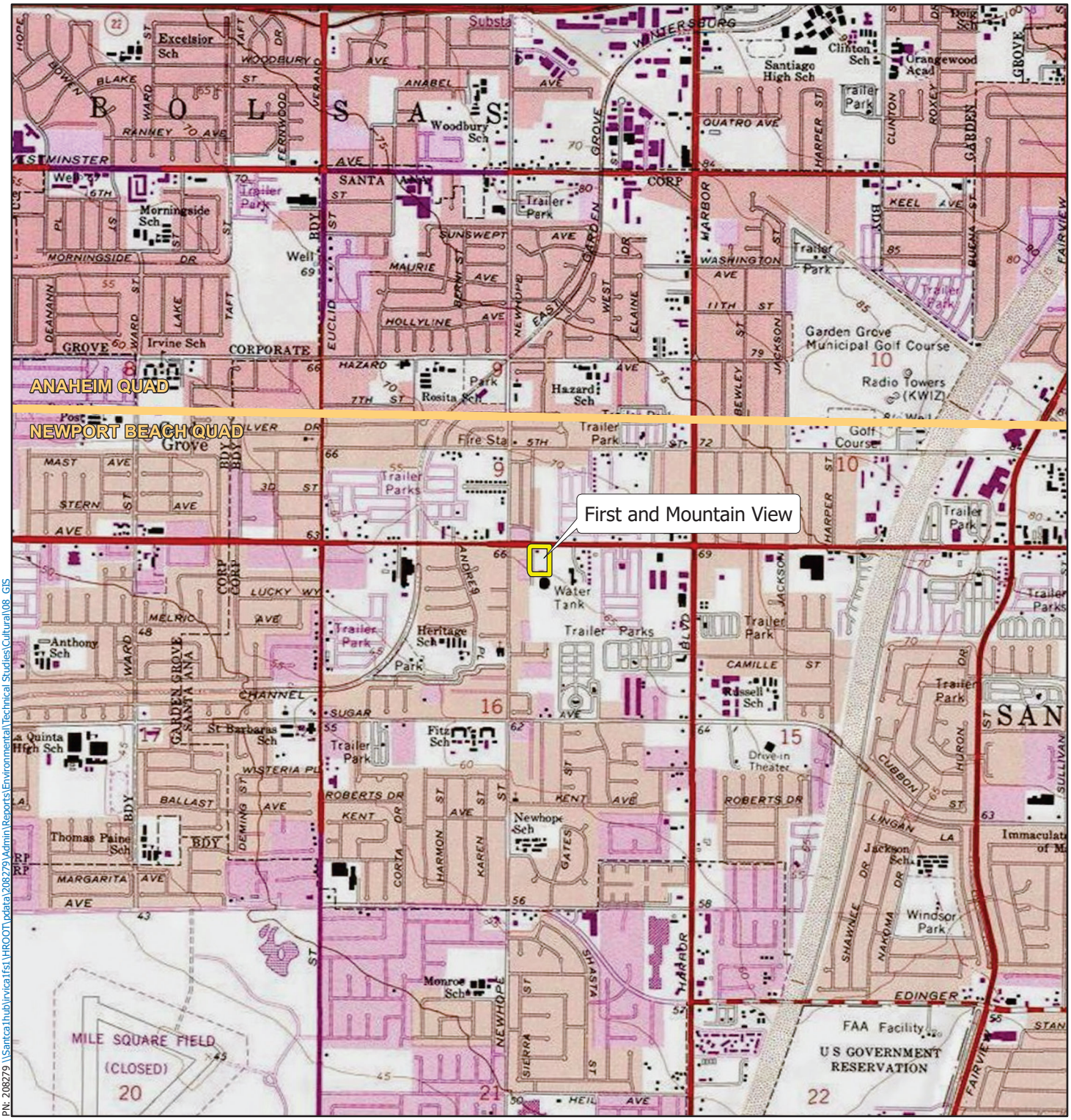
Michael Baker INTERNATIONAL

0 2.5 5 Miles

Source: Esri, ArcGIS Online, National Geographic World Map: *Garden Grove, California*

Regional Vicinity

Figure 1



PN: 208279 \\Santca1hub\irvica1fs1\HROOT\data\208279\Admin\Reports\Environmental\Technical Studies\Cultural\08_GIS

Legend

Project Area

FIRST AND MOUNTAIN VIEW

Michael Baker INTERNATIONAL

0 0.25 0.5 Miles

Source: Esri, ArcGIS Online, Newport Beach USGS 7.5-Minute topographic quadrangle maps: *Garden Grove, California*

Project Vicinity

Figure 2



PN: 208279 \\SantaAnaJhub\Irvine1fs1\HROOT\data\208279\Admin\Reports\Environmental\Technical Studies\Cultural\08_GIS

Legend

Project Area

FIRST AND MOUNTAIN VIEW

Michael Baker INTERNATIONAL

0 65 130

US Feet

Source: Esri, ArcGIS Online, 2025 Nearmap Imagery: *Garden Grove, California*

Project Area

Figure 3

Appendix B

Records Search Results (Confidential)

Appendix C
NHMLAC Record Search Results

Natural History Museum
of Los Angeles County
900 Exposition Boulevard
Los Angeles, CA 90007

tel 213.763.DINO
www.nhm.org

Research & Collections

e-mail: paleorecords@nhm.org

August 3, 2025

Michael Baker International
Attn: Paige Kohler

re: Paleontological resources records search for the First & Mountain View Project

Dear Paige:

I have conducted a search of our paleontology collection records for the proposed development at the First & Mountain View Project area as outlined on the portion of the Newport Beach USGS topographic quadrangle map that you sent to me via e-mail on July 28, 2025. We do not have fossil localities that have been recorded or georeferenced directly within the proposed project area, but we do have fossil localities nearby from similar sedimentary deposits that may occur in the proposed project area, either at the surface or at depth.

The following table shows the closest known localities in the collection of the Natural History Museum of Los Angeles County (NHMLA).

Locality Number	Location	Formation	Taxa	Depth
LACM VP 6370, 6371; LACM IP 17003-17005	Near the intersection of Superior Avenue & Pacific Coast Highway; Newport Beach	Terrace deposits (Pleistocene, silty sandstones)	Horse (*Equus*), other unspecified mammals; Invertebrates: clam (*Tivela*, *Donax*, *Lucinisca*), scaphopod (*Dentalum*, *Antalis*), marine gastropods (*Glossaulax*, *Chlorostoma*)	Unknown (found during grading for parking lot construction)
LACM IP 4695	Bristol St. and Paularino Ave.	Palos Verdes Sand	Invertebrates - clam (*Saxidomus*), bryozoan (Bryozoa indet., *Conopeum*)	Unknown
LACM IP 21488	South of the Santa Ana River near Adams Ave	Unknown formation (Pleistocene; med to coarse limonitic stained sand)	Invertebrates (unspecified)	Unknown
LACM VP 7657 - 7659	Ellis Avenue & Patterson Lane, Huntington Beach	Unknown Formation (Pleistocene; gray siltstone)	School shark (*Galeorhinus*), eagle ray *(Myliobatus*), goby (*Lepidogobius, Leptocottus*), midshipmen (*Porichthys*), croaker *(Seriphus*), flatfish (*Citharichthys*), cusk-eel (*Otophidium*), skate (*Raja*),	150 - 350 feet bgs

Locality Number	Location	Formation	Taxa	Depth
			angelshark (*Squatina*), sculpin (Cottidae)	
LACM VP 65113	Wintersburg Road; Huntington Beach	Unknown formation (Pleistocene)	Mammoth (*Mammuthus*), bison (*Bison*); uncatalogued invertebrates	6 - 20 feet bgs

VP, Vertebrate Paleontology; IP, Invertebrate Paleontology; bgs, below ground surface

This records search is limited to the records of the NHMLA. It is not intended as a paleontological assessment of the project for the purposes of California Environmental Quality Act (CEQA) or National Environmental Policy Act (NEPA). Potentially fossil-bearing units are present in the project area, either at the surface or in the subsurface. As such, NHMLA recommends that a paleontological assessment be conducted by a paleontologist meeting Federal (43 Code of Federal Regulations Part 49.110) or Society of Vertebrate Paleontology standards for compliance with applicable regulations, such as CEQA or NEPA.

Sincerely,



Alyssa Bell, Ph.D.
Natural History Museum of Los Angeles County

Appendix D
DPR 523 Recording Forms

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code Reviewer Date

 ***Resource Name or #:** 201 S. Mountain View Street

P1. Other Identifier: Charlie's Hot Lunch; Charlie's Foods; CA Foods
*__P2. Location: ☒ Unrestricted__
- ***a. County:** Orange
- ***b. USGS 7.5' Quad Date T R Section**
- **c. Address:** 201 S. Mountain View Street **City:** Santa Ana **Zip:** 92704
- **d. UTM:**
- **e. Other Locational Data:** 4320 W. First Street (alternate address); Assessor Parcel Number (APN): 188-021-10; 188-021-11

***P3a. Description:**
The subject property is a former food truck commissary at the southeast corner of 1st and Mountain View Streets in Santa Ana. The property has frontage on both streets and occupies a 2.5-acre site that spans two legal parcels. At the south end of the property is a two-story commercial building that was constructed in 1977 and used as a commissary and offices for a food truck business. The building is utilitarian in style, is roughly rectangular in plan, and is constructed of concrete masonry units (CMU). It is capped by a flat roof with rolled asphalt sheathing, a slab eave, and parapets. Exterior walls are unfinished and consist of exposed concrete blocks. The primary façade faces north and contains the main entrance, which consists of paired, solid metal doors **(Photograph 1)**. Other features on the primary façade include a metal canopy with metal post supports and three secondary entrances comprising solid metal and wood doors. The west façade includes two secondary entrances comprising solid metal doors, and a small utility enclosure with chain link fencing. The east façade features a one-story trapezoidal volume with a garage bay and metal doors **(Photograph 2)**. The south façade abuts the rear (south) property line and consists of an unarticulated CMU wall. Fenestration is minimal and consists of sliding aluminum windows; one window is infilled, and two are affixed with metal security bars. (See Continuation Sheets)

***P3b. Resource Attributes:** HP6. 1-3 Story Commercial Building
***P4. Resources Present:** ☐ Building



P5a. Photo or Drawing

P5b. Description of Photo:
Photograph 1:
Warehouse/office building, north façade, camera facing southeast.

P6. Date Constructed/Age and Source:
☒ Historic
1977 (City of Santa Ana permit)

***P7. Owner and Address:**
Not recorded

***P8. Recorded by:**
Andrew Goodrich, AICP
Michael Baker International
801 S. Grand Avenue, Suite 250
Los Angeles, CA 90017

***P9. Date Recorded:**
September 5, 2025

***P10. Survey Type:** Intensive Pedestrian

***P11. Report Citation:** Kohler, Paige, and Andrew Goodrich. 2025. "Cultural Resources Assessment for the First & Mountain View Project, Santa Ana, Orange County, California." Los Angeles: Michael Baker International.

***Attachments:** ☒Building, Structure, and Object Record ☒Location Map ☒Continuation Sheet

B1. Historic Name: Charlie's Hot Lunch
B2. Common Name: Charlie's Foods; CA Foods; 201 S. Mountain View Street; 4320 W. First Street
B3. Original Use: Commercial (Food Truck Commissary) **B4. Present Use:** Vacant/Not in Use
***B5. Architectural Style:** Vernacular
***B6. Construction History:**

The property was built in 1977 as a food truck commissary and originally included a supply/office building, one ice house structure, and a surface parking lot, all located on what is now the southern half of the property. In 1983, the commissary expanded to include an undeveloped parcel to the north, encompassing what is now the northern half of the property; this involved removal of an alley that once separated the two parcels, extension of the commissary parking lot north to 1st Street, construction of a second ice house structure, and construction of a 6' CMU perimeter wall. In 1996, a union hall building at 4310 W. 1st Street was razed, allowing the commissary to expand into what is now the far northwest corner of the property. In 2022, the roof of the supply/office building was replaced with new built-up roofing (City of Santa Ana Building Permits, various dates).

***B7. Moved?** ☒**No** **Date:** N/A **Original Location:** N/A
***B8. Related Features:** N/A

B9a. Architect: D.L. Hayes Associates **b. Builder:** Charlie Akoboff
***B10. Significance:** N/A **Theme:** Commercial Development
Area: Santa Ana **Period of Significance:** N/A **Property Type:** N/A **Applicable Criteria:** N/A

Historic Context
History of Santa Ana
Modern-day Santa Ana owes its existence to William Spurgeon, an itinerant Kentuckian who came to California to partake in the Gold Rush and pivoted to a career in real estate. In 1869, Spurgeon ventured south in search of a suitable location for a new town, eventually arriving in the southeast section of what was then Los Angeles County. Purportedly perturbed by his inability to see beyond the area's dense concentration of native mustard plants, Spurgeon scaled a sycamore tree to survey the area and subsequently purchased 74 acres of land, about eight miles south of the town of Anaheim and about two miles east of the Santa Ana River. He named the town Santa Ana, constructed a house and general store, opened a post office, and commissioned a survey of the nascent town that was originally bounded by 1st, 7th, Spurgeon, and West (now Broadway) streets (Emmons 2001). (See Continuation Sheets)

B11. Additional Resource Attributes:
***B12. References:** See Continuation Sheets.
B13. Remarks:
***B14. Evaluator:**
Andrew Goodrich, AICP | Senior Architectural Historian
Michael Baker International
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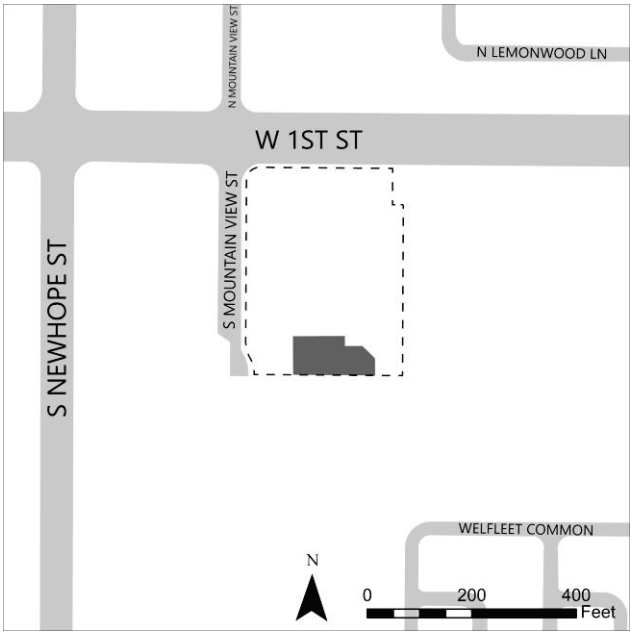
***Date of Evaluation:** September 5, 2025

(Sketch Map with north arrow required.)



(This space reserved for official comments.)

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

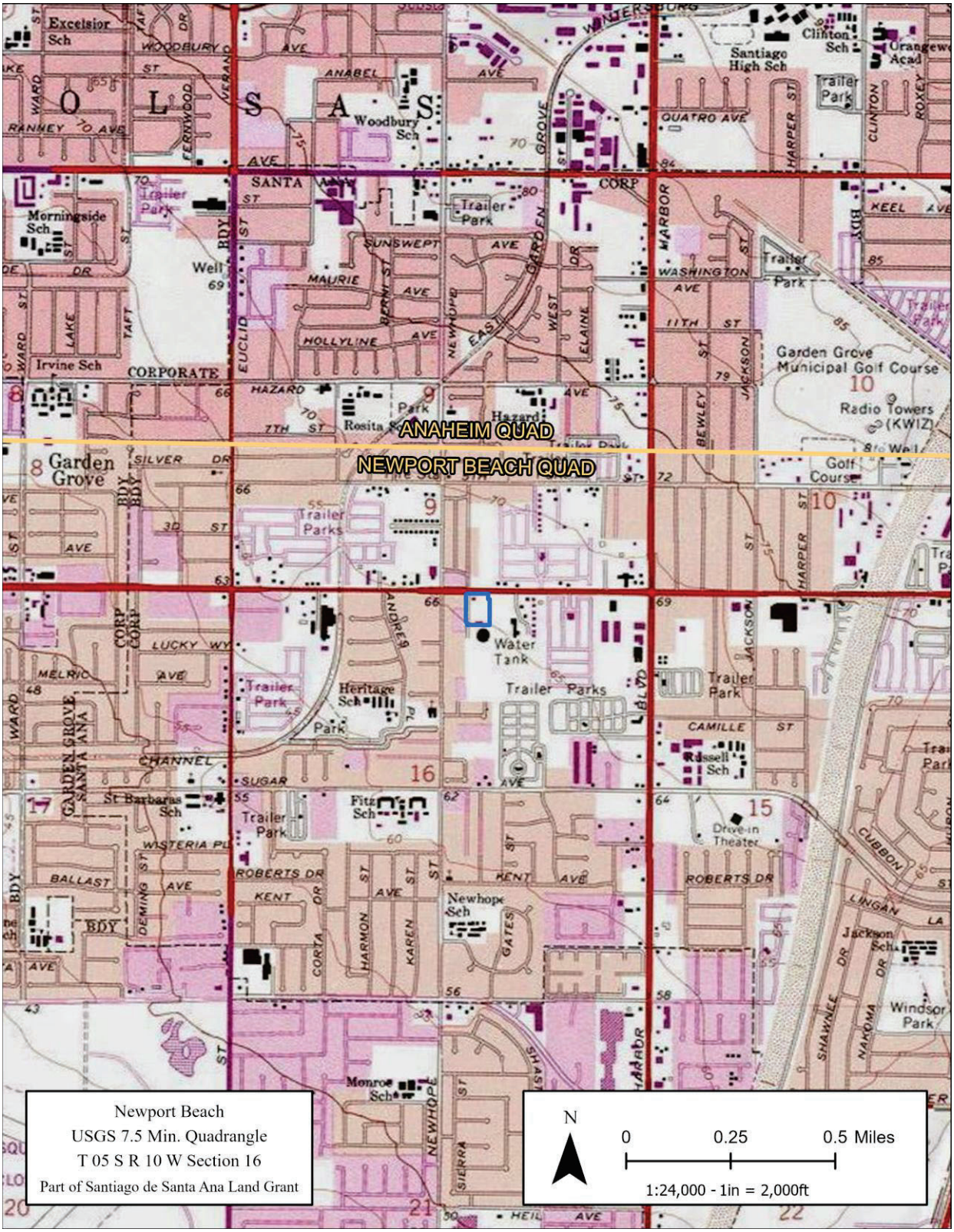
LOCATION MAP

Primary #
HRI#
Trinomial

***Resource Name or #:** 201 S. Mountain View Street

***Map Name:** *Newport Beach and Anaheim Quads*

***Scale:** 1:24,000



P3a. Description (continued):

There are multiple ancillary structures on the property. At the southeast corner of the property is a shed structure with a corrugated metal canopy and steel posts and trusses **(Photograph 3)**. This structure was used to wash and service catering trucks. Near the center of the property are two detached ice structures that were used to store and distribute ice to the catering trucks that docked on site **(Photographs 4 and 5)**. Each ice structure is constructed of CMU and has an overhead wood catwalk and operable metal hatches. At the east entrance to the property is a guard shack structure with a shed roof and glazing. Storage sheds are installed at various points along the north property line.

Most of the property is paved with concrete **(Photograph 6)**. Metal docking stations are installed at various points in the paved lot; they provided docked trucks with hookups and conduit for utilities **(Photograph 7)**. The paved lot is illuminated by metal light posts installed on cylindrical concrete bases. Access to the property is granted by two driveways, one facing north (toward 1st Street) and a second facing west (toward Mountain View Street); the aforementioned guard shack is located at the west entrance. The property is surrounded by a CMU perimeter wall and a landscaped buffer that includes manicured shrubs and mature podocarpus and ficus trees.



Photograph 2. Supply/office building, view facing southwest.



Photograph 3. Shed structure at southeast corner of property, view facing south.



Photograph 4. South icehouse, view facing northwest.



Photograph 5. North icehouse, view facing southwest.



Photograph 6. Surface parking, view facing north.



Photograph 7. Surface parking and docking station, view facing west.

Alterations

The following alterations to the subject property were noted during field documentation:

- Some original windows have been boarded up
- Metal security bars have been affixed to some windows
- One entrance door (on the restroom volume of the primary/north façade) has been replaced

***B10. Significance (continued):**

In 1875, the Southern Pacific Railroad opened a rail line between Los Angeles and Anaheim and expressed interest in extending the line further south. Aware of the railroad's tremendous potential to influence development, Spurgeon and a group of monied local investors offered Southern Pacific a litany of concessions – including right-of-way, 90 acres of real estate, and $10,000 cash – in exchange for selecting Santa Ana as the southern terminus of the extended rail line. This effort proved fruitful: Southern Pacific constructed a rail depot in Santa Ana in 1877, and the first locomotives arrived later that year (Brigandi 2019). Arrival of the railroad played a pivotal role in putting Santa Ana on the map; it also came at the expense of nearby Tustin, which had also lobbied for a railroad connection but was bypassed, leaving its founder, Columbus Tustin, a "bitterly disappointed man" (City of Tustin n.d.). In 1887, a second rail line was completed to Santa Ana via Riverside by the competing Atchison, Topeka and Santa Fe Railroad (Lovret 2007).

By the turn of the twentieth century, Santa Ana had shed its roots as a peripheral outpost and had matured into a regional urban center. The town incorporated in 1886, and in 1889, when the southeast corner of Los Angeles County broke away to become Orange County, Santa Ana was anointed the county seat – this time, at the expense of the nearby city of Orange (*Los Angeles Times* 1976). In 1905, the Los Angeles Interurban Railway – a forebear to the Pacific Electric Railway – opened a 35-mile electric streetcar line between downtown Los Angeles and Santa Ana, which improved connectivity between the two cities and further stimulated Santa Ana's growth (Bowers Museum 2022). Indeed, Santa Ana's population increased manifold in the early decades of the twentieth century, from 8,429 in 1910, to 15,485 in 1920, and to 30,322 in 1930 (OC Almanac n.d.). The city was anchored by a monumental courthouse that was the hub of county government, and a business district that was centered around 4th and Main streets and spanned multiple city blocks.

Agriculture was the linchpin of Santa Ana's economy prior to World War II. Its fertile hinterlands were used to grow various crops including sugar beets, lima beans, celery, walnuts, berries, and oranges. These crops were harvested and sent to area packinghouses, where they were then loaded onto trains and shipped to market (Masters 2012). During World War II, the military also became an important economic engine as multiple military bases were activated in Orange County, including the El Toro Marine Corps Air Station near Irvine, the Santa Ana Army Air Base in what is now Costa Mesa, and Naval training and weapons facilities in Seal Beach and Los Alamitos. Many of those who were stationed at these bases returned to the Santa Ana area after the war to set down roots and take advantage of low-cost home loans and other benefits provided to them under the G.I. Bill (Orange County Historical Society n.d.).

Santa Ana was well positioned to grow rapidly after World War II. The city had an established presence and population base, was centrally located at the heart of Orange County, and was readily accessible from Los Angeles and other destinations. It was also surrounded by agricultural land that was suited to the development of residential tracts and was located along the route of the Santa Ana Freeway (Interstate 5), which was completed to Santa Ana in 1955 (Architectural Resources Group 2021). The population of Santa Ana was 45,533 in 1950, 100,350 in 1960, and 155,710 in 1970 (OC Almanac), and dozens of annexations in the postwar period pushed its boundaries further out into the emerging suburban periphery. In 1969, more than four square miles on the west side of the Santa Ana River were annexed by Santa Ana in what was one of the largest and most contentious annexations in the city's history (*Los Angeles Times* 1969).

The city also witnessed significant demographic shifts after World War II. In 1965, President Lyndon B. Johnson signed into law the Immigration and Nationality Act, legislation that abolished national origin quotas – which favored western and northern European nations – in exchange for a more equitable immigration system that led to an uptick in immigration from countries in Asia, Africa, and Latin America (Kammer 2015). Many of those who came to Southern California from Mexico at this time settled in Santa Ana due to its affordable housing stock, proximity to jobs that relied on immigrant labor, and the presence of an existing Latino community that fostered social ties and offered a support network to new arrivals. Simultaneously, the number of white residents in Santa Ana dropped as many of the city's white families increasingly moved away to new suburban communities. By 1980, 41 percent of Latino immigrants in Orange County lived in Santa Ana, and by 1986 the city's population was 62 percent Latino (Haas 1995: 256).

By 1990, Santa Ana had the highest percentage (65 percent) of Latino residents of any major California city, surpassing Los Angeles (40 percent) and Anaheim (30 percent) (Eng and Schwartz 1991). Santa Ana continues to be an epicenter of Latino community and culture, centered around the 4th Street corridor which is now flanked by largely Latino-owned businesses and is referred to within the community as *Calle Cuatro* (Carcamo 2016). A streetcar line connecting transportation and employment centers in downtown Santa Ana with a bus line in nearby Garden Grove is under construction and is expected to open in 2026 (Orange County Transportation Authority n.d.).

Mobile Kitchens and Catering Trucks

The practice of preparing food from a mobile catering kitchen dates to the nineteenth century. In 1866, Texas rancher Charles Goodnight invented the chuckwagon to feed cowboys herding cattle in remote areas for extended periods of time, often months on end. Goodnight took a surplus Army wagon and converted it into a mobile kitchen, adding a pantry box, storage for cooking implements, and a hinged door that laid flat to create a table. The average chuckwagon was staffed by a "cookie," often an ex-cowboy, who not only prepared three square meals per day but was also tasked with driving the wagon, setting up camp, and serving as de facto doctor, dentist, barber, banker, or other jobs that were needed on the trail. Food served from chuckwagons included items that were easy to preserve including beans, rice, dried and salted meats, sourdough biscuits, onions, potatoes, and coffee. Chuckwagons also typically carried water barrels, fuel, and other equipment and vital supplies (National Park Service 2021).

In 1872, Rhode Islander Walter Scott pioneered a similar concept called the "lunch wagon," which catered to workers in many Northeastern cities during the Industrial Revolution. These workers often had grueling schedules and did not end their shifts until late at night, by which time restaurants were closed. Scott's invention consisted of a horse-drawn freight wagon that he converted into a mobile eatery, which sold hot coffee, sandwiches, pie, and other light fare. He parked his retrofitted wagon outside the offices of the *Providence Journal* at night and attracted a crowd of late-shift newsmen (Gutman 1993:14). Others took Scott's idea and further finessed it, resulting in purpose-built lunch wagons that became a ubiquitous element of industrializing American cities (Engber 2014). The advent of the automobile in the early twentieth century made it easier for vendors to sell food outside the traditional confines of a brick-and-mortar restaurant. What is often cited as the first example of a food truck was the ice cream truck, which was introduced by Ohio confectioner Harry Burt in 1920. Burt, who had developed an ice cream bar encased in a chocolate shell and affixed to a stick, purchased a fleet of refrigerated trucks to sell his product – called Good Humor Bars – directly to customers on the street (Sheldon 2025).

Mobile canteens, or cold trucks – refrigerated trucks that sold pre-made sandwiches and other pre-packaged items that could be kept over ice – could be found on the streets of many American cities as early as the 1920s. Mobile canteens would typically travel to factories and construction sites during lunch hours and served blue-collar workers, many of whom had no other option but to bring their own meal from home. The number of mobile canteens increased after World War II as the American economy grew, and the trucks provided quick and affordable meals to an expanding industrial and office workforce in the post-World War II period (Gepfert 1978).

Some vendors adapted food trucks so that they could prepare hot meals directly from the vehicle. Known as catering trucks, or hot trucks, they are believed to have originated in Los Angeles County in the 1960s (Gepfert 1978). Hot trucks were distinguished from cold trucks from their inclusion of full-service, on-site kitchens with sinks, deep fryers, ovens, grilles, refrigerators, and freezers. Hot trucks were typically staffed with both a driver and cook on board. Popular menu items included hamburgers, egg sandwiches, burritos, and other items that could be quickly prepared. These hot trucks were often hazardous for workers, lacked hot and cold running water,

and had questionable sanitation practices, which earned them the pejorative nickname of "roach coach" (Belcher 1987). They were detested by the owners of cold trucks and traditional restaurants, which saw their rise as posing an existential threat (Vida 1982).
In 1974, restauranteur Raul Martinez converted an old ice cream truck into a hot truck serving soft-shell tacos in East Los Angeles. Known as King Taco, Martinez's endeavor is widely considered to be the nation's first example of a taco truck – a type of mobile kitchen that has since become ubiquitous in Southern California and has expanded to other cities across the nation (Hernandez 2024).

Food trucks suffered from a dismal reputation based on perceptions of quality and sanitation, but this changed in the early 2000s when street food vendors sought to elevate their standing. In 2005, the first annual Vendy Awards were hosted in New York City to honor street vendors (Bowen 2005). Three years later in 2008, maverick chef Roy Choi opened the Kogi taco truck in Los Angeles, which prepared Korean-Mexican fusion fare and was a major moment in gastronomic history. Perhaps more than any other restauranteur of his era, Choi is credited with elevating the food truck experience by providing fresh, quality, and inventive street food (Gelt 2009).

Food Truck Commissaries

With the rise of the modern food truck came the advent of a new property type: the food truck commissary. Food truck commissaries are shared facilities that support the logistical operations of food truck operators and serve as their home base. A typical food truck commissary includes a multitude of amenities: wholesale grocery sales, commercial kitchens for food preparation, off-street overnight parking, electrical hookups, grease and wastewater disposal, dry and cold food storage lockers, truck washing and maintenance facilities, ice and propane refills, and administrative support. Essentially, commissaries accommodate back-of-house operations that cannot be completed within the limited square footage of the truck itself. Many jurisdictions require food truck operators to belong to a commissary to comply with public health regulations and avoid parking overnight on public streets (Hebert 2025; Peña 2013).

Food truck commissaries began appearing in American cities in the 1970s, when hot food trucks were becoming increasingly popular. Commissaries are typically located in urban areas zoned for commercial or light industrial use; are anchored by a central building that houses administrative offices, grocery and kitchen facilities, and food storage lockers; and include paved surfaces that are used for truck parking, maintenance, and waste disposal. Excluding the subject property, there are currently six operational food truck commissaries in Orange County including three in Santa Ana, two in Anaheim, and one in Irvine (OC Health Care Agency).

Development of the Subject Property

Building permits indicate that the subject property was constructed in 1977 as a central supply house and associated facilities to support a fleet of commercial catering trucks. It originally included a supply/office building, one ice house structure, and a parking lot, all located on what is now the southern half of the property. The property was built by Charlie Akoboff (1930-2014), who owned a commissary that operated under the names Charlie's Hot Lunch, Charlie's Foods, and CA Foods. In 1983, Akoboff's commissary expanded to include a vacant property to the north, and in 1996 an existing building at the southeast corner of 1st and Mountain View streets was demolished to accommodate a second expansion of the commissary (City of Santa Ana various dates). The commissary closed in 2024.

Evaluation

The following section includes an evaluation of the subject property against designation criteria for the California Register of Historical Resources (California Register) and the Santa Ana Register of Historic Properties.

California Register

California Register Criterion 1

Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage (CR).

The subject property was purpose-built as a food truck commissary in 1977 and is broadly associated with the rising popularity of food trucks during the later decades of the twentieth century. However, research did not suggest that the property is historically significant within this context. It was one of many such facilities that were built in urban communities across Southern California to support the logistical needs of food truck operators. Its construction does not appear to have represented a momentous occasion in the evolution of gastronomic culture in Southern California and elsewhere, but was rather a common reaction to this broad pattern of commercial development and consumer habits.

In addition, research did not indicate that the property is associated with a singular event of historical significance. Since its construction in 1977, it appears to have operated as nothing more than a typical food truck commissary.

For these reasons, the subject property does not meet the significance threshold for listing under California Register Criterion 1.

California Register Criterion 2

Is associated with the lives of persons important in our past (CR).

The subject property was built for, and operated by Charlie Akoboff, who operated a food truck commissary that was alternatively known as Charlie's Hot Lunch, Charlie's Foods, and CA Foods. Research did not produce information indicating that Akoboff was a historically significant individual in the spirit of this criterion. Aside from owning and operating a successful food truck commissary, Akoboff does not appear to have made significant contributions to history. Rather, he appears to have been one of many entrepreneurs that built their business around the rise of food trucks in the late nineteenth and early twentieth centuries.

For these reasons, the subject property does not meet the significance threshold for listing under California Register Criterion 2.

California Register Criterion 3

Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values (CR).

The subject property contains one building and multiple ancillary structures that were built between 1977 and 1983. These improvements are utilitarian and lack the distinctive characteristics of an architectural style or period. They are constructed of concrete block – a very common construction type that was used because of its efficiency and economy. There is nothing distinctive about this method of construction.

The property was constructed as a food truck commissary and exhibits some characteristics of this type: a commercial or light industrial setting, a central support/office building, paved surface parking, and ancillary structures that supported the operations of food truck operators. However, it is neither distinctive nor unique in this respect. As noted, there are six other food truck commissaries in Santa Ana and many more across the landscape of Southern California, all of which exhibit the same cadre of characteristics. The subject property reads as a representative example of a food truck commissary, and not as a distinctive or significant example of this property type.

The architect of record for the subject property is D.L. Hayes and Associates of Santa Fe Springs, which was headed by architect Don L. Hayes. Research uncovered scant information about the firm and its principal, indicating that Hayes is not a "master" in the spirit of this criterion.

The property does not represent a significant distinguishable entity whose components may lack individual distinction. It is located in an area of Santa Ana that contains an assortment of land uses and property types including single-family houses, multi-family residential properties, and commercial strip malls. None of these uses relate to one another in a meaningful way.

For these reasons, there is insufficient evidence indicating that the subject property is a significant example of an architectural style, type, period, or method of construction; or represents the work of a master; or possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction. It does not meet the significance threshold for listing under California Registration Criterion 3.

California Register Criterion 4

Has yielded, or may be likely to yield, information important in prehistory or history (CR).

It is unlikely that the subject property has the potential to yield valuable information which will contribute to our understanding of human history because the property is not and never was the principal source of important information pertaining to significant events, people, architectural style, or building technology. Since the property has been extensively graded and developed, its potential to contain subsurface archaeological resources is nominal.

For these reasons, the subject property does not meet the significance threshold for listing under California Register Criterion 4.

Local (Santa Ana) Designation Criteria

Following is an evaluation of the subject property against criteria for the local (City of Santa Ana) historic resource register, which are listed in Section 30-2 of the Santa Ana Municipal Code. To be eligible for local designation, a resource must be at least fifty years of age and must also meet at least one of the following criteria:

Santa Ana Criterion 1

Buildings, structures or objects with distinguishing characteristics of an architectural style or period, that exemplify a particular architectural style or design features.

As discussed in the evaluation against California Register Criterion 3, the subject property is a utilitarian improvement that does not embody distinguishing characteristics of an architectural style or period. For these same reasons, the property does not meet the significance threshold for listing under Santa Ana Criterion 1.

Santa Ana Criterion 2

Works of notable architects, builders, or designers whose style influenced architectural development.

As discussed in the evaluation against California Register Criterion 3, the subject property was designed by the architectural firm of D.L. Hayes and Associates of Santa Fe Springs, and there is insufficient evidence indicating that this firm or its personnel are regarded as masters. For these same reasons, the property does not meet the significance threshold for listing under Santa Ana Criterion 2.

Santa Ana Criterion 3

Rare buildings, structures, or objects or original designs.

The subject property is not a rare structure, building, or object or an original design. As noted, there are six other operational food truck commissaries located in Orange County, three of which are located within the Santa Ana city limits. There are other numerous other commissaries in nearby jurisdictions. Therefore, the property is not rare and does not meet the significance threshold for Santa Ana Criterion 3.

Santa Ana Criterion 4

Buildings, structures, objects or sites of historical significance which include places: (a) where important events occurred; (b) associated with famous people, original settlers, renowned organizations and businesses; (c) which were originally present when the city was founded, and (d) that served as important centers for political, social, economic, or cultural activity.

As discussed in the evaluation against California Register Criterion 1, the subject property is not a place where important events occurred. For these same reasons, it does not meet the significance threshold for Santa Ana Criterion 4(a).

As discussed in the evaluation against California Register Criterion 2, the subject property is not associated with historically significant individuals. It is also not associated with the original settlers of Santa Ana, which was founded more than a century before the subject property was constructed; and there is insufficient evidence demonstrating that the food truck commissary alternatively known as Charlie's Hot Lunch, Charlie's Foods, and CA Foods was a renowned organization or business in the spirit of this criterion. For these reasons, the property does not meet the significance threshold for Santa Ana Criterion 4(b).

Santa Ana was founded in 1869 and incorporated in 1886. The subject property was built in 1977 and expanded in 1983 and 1996 – a century after the City was established. It was not originally present when the City was founded and thus does not meet the significance threshold for Santa Ana Criterion 4(c).

There is insufficient evidence demonstrating that the subject property was an important center for political, social, economic, or cultural activity. Rather, it appears to have operated as a typical commercial property serving a common commercial need. Therefore, the property does not meet the significance threshold for Santa Ana Criterion 4(d).

Santa Ana Criterion 5

Sites of archaeological importance.

As discussed in the evaluation against California Register Criterion 4, the subject property does not appear to be a site of archaeological importance. For these same reasons, it does not meet the significance threshold for Santa Ana Criterion 5.

Santa Ana Criterion 6

Buildings or structures that were connected with a business or use which was once common, but is now rare.

The subject property is not connected with a business or use which was once common but is now rare. As noted above, the property is one of seven food truck commissaries in Orange County and among dozens of like properties in Southern California, all of which serve the same essential purpose and embody the same physical characteristics. Food truck commissaries are not rare, either locally or regionally. Therefore, the property does not meet the significance threshold for Santa Ana Criterion 6.

Integrity

Integrity is generally assessed only after significance has been established. As discussed, the subject property does not meet eligibility criteria for any of the registers; therefore, an integrity assessment was not completed.

Conclusion

Based on research, site documentation, and analysis, Michael Baker International concludes that the property at 201 Mountain View Street does not meet eligibility criteria for listing in the California Register or Santa Ana Register.

***B12. References (continued):**

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