

5.2 Cultural Resources

5.2.1 INTRODUCTION

This section describes the existing setting of the Project site and surrounding area related to historic and archaeological resources. This section also addresses potential environmental effects of the proposed Project related to cultural resources, which include historic and archaeological resources. Information within this section is based on the following:

- *City of Santa Ana General Plan Update*
- *City of Santa Ana General Plan Update FEIR*
- *City of Santa Ana Municipal Code*
- *Historic Resource Assessment (Appendix D)*
- *Archaeological Resources Assessment (Appendix E)*

In accordance with Public Resources Code Section 15120(d), the City has in its possession confidential information and communications that disclose the location of archaeological sites and sacred lands. While the City used that information to prepare its analysis in this section, the information is not attached as an appendix to this EIR. The documents are maintained separately in the City's files.

Definitions

- **Archaeological resources** include any material remains of human life or activities that are at least 100 years of age, and that are of scientific interest. A unique or significant archaeological resource is an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it (1) contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information; (2) has a special and particular quality, such as being the oldest of its type or the best available example of its type; and (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.
- **Cultural resources** are defined as buildings, sites, structures, or objects, each of which may have historic, architectural, archaeological, cultural, or scientific importance, according to CEQA.
- **Historic building or site** is one that is noteworthy for its significance in local, state, or national history or culture, its architecture or design, or its works of art, memorabilia, or artifacts.
- **Historic context** refers to the broad patterns of historical development in a community or its region that is represented by cultural resources. A historic context statement is organized by themes such as economic, residential, and commercial development.
- **Historic integrity** is defined as "the ability of a property to convey its significance."
- **Historical resources** are defined as "a resource listed or eligible for listing on the California Register of Historical Resources" (CRHR) (Public Resources Code, Section 5024.1; 14 CCR 15064.5). Under CEQA Guidelines Section 15064.5(a), the term "historical resources" includes the following:
 - (1) A resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resources Code, Section 5024.1).

- (2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- (3) 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 may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Public Resources Code Section 5024.1) including the following:
 - (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
 - (B) Is associated with the lives of persons important in California's past;
 - (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
 - (D) Has yielded, or may be likely to yield, information important in prehistory or history.
- (4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

5.2.2 REGULATORY SETTING

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) established the National Register of Historic Places (National Register), which is the official register of designated historic places. The National Register is administered by the National Park Service, and includes listings of buildings, structures, sites, objects, and districts that possess historical, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

To be eligible for the National Register, a resource must be significant under one or more of the following criteria per 36 Code of Federal Regulations Part 60:

- A. Resources that are associated with events that have made a significant contribution to the broad patterns of our history;
- B. Resources that are associated with the lives of persons significant in our past;

- C. Resources that embody the distinctive characteristics of a type, period or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Resources that have yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the aforementioned criteria, an eligible resource must also possess historic “integrity,” which is “the ability of a property to convey its significance.” The National Register criteria recognize seven qualities that define integrity: location, design, setting, materials, workmanship, feeling, and association.

Structures, sites, buildings, districts, and objects over 50 years of age can be listed in the National Register as significant historical resources. Properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the National Register.

Properties listed in or eligible for listing in the NRHP are also eligible for listing in the California Register of Historic Resources, and as such, are considered historical resources for CEQA purposes.

California Register of Historical Resources

The California Register of Historical Resources (CRHR or California Register) is an inventory of significant architectural, archeological, and historical resources in the state of California. Resources can be listed on the California Register through a number of methods. State Historical Landmarks and National Register listed properties are automatically listed on the California Register. Properties can also be nominated to the California Register by local governments, private organizations, or citizens. The evaluative criteria used by the California Register for determining eligibility are closely based on those developed by the National Park Service for the National Register. In order for a property to be eligible for listing on the California Register, it must be found significant under one or more of the following criteria:

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

In addition, resources eligible for the National Register of Historic Places are automatically listed on the California Register of Historical Resources.

California Health and Safety Code, Section 7050.5

This code requires that if human remains are discovered on a project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

City of Santa Ana General Plan

The City's General Plan Update (GPU) includes policies related to historic and archaeological resources in the Historic Preservation and Land Use Elements that include the following which are applicable to the proposed Project:

Historic Preservation Element

- GOAL HP-1:** Preserve and enhance Santa Ana's historic areas and resources to maintain a unique sense of place.
- POLICY HP-1.1** Preserve unique neighborhoods and structures in Santa Ana through implementation of the Citywide Design Guidelines and historic preservation best practices.
- POLICY HP-1.4** Support land use plans and development proposals that actively protect historic and cultural resources. Preserve tribal, archeological, and paleontological resources for their cultural importance to communities as well as their research and educational potential.

Land Use Element

- POLICY LU-3.5** Encourage the preservation and reuse of historical buildings and sites through flexible land use policies.

City of Santa Ana Municipal Code

Section 30-3; Application of State Historical Building Code: Any building or structure designated as having historical or architectural importance by inclusion in the city register of historical properties shall be deemed a "qualified historical building or structure" for purposes of applying the state historical building code, as set forth in Part 2.7 (commencing with Section 18950) of Division 13 of the Health and Safety Code of the state of California and Part 8 of Title 24 of the California Administrative Code.

Section 30-2 et seq.; Criteria for Selection

- (a) Any person or group may request a building, or part thereof, structure, object or site, to be designated to be included on the city register of historical properties (called "register" in this section). The applicant must submit documentation that demonstrates how the nominated building, structure, object or site satisfies the criteria for designation. A building, structure, object, or site may be designated for inclusion on the register if the building, structure, object or site is 50 or more years old and if the commission finds that one or more of the following conditions are met:
- (1) Buildings, structures or objects with distinguishing characteristics of an architectural style or period, that exemplify a particular architectural style or design features; architectural development;
 - (2) Works of notable architects, builders, or designers whose style influenced architectural development;
 - (3) Rare buildings, structures, or objects or original designs;
 - (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; or

d. That served as important centers for political, social, economic, or cultural activity.

(5) Sites of archaeological importance;

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

Categorization

The historic resources commission shall, by resolution and at a duly noticed public hearing, place all buildings, structures, objects, or sites on the city register of historical properties in one of the following categories based upon one of the criteria in the following categories:

(1) Landmark category.

- a. The building, structure, object or site is on the national register or appears to be eligible to be placed on the register; or
- b. The building, structure, object or site is on the state register or appears to be eligible to be placed on the register;
- c. The building, structure, object or site has an historical/cultural significance to the city;
- d. The building, structure, object or site has a unique architectural significance.

(2) Key category.

- a. The building, structure, object or site has a distinctive architectural style and quality;
- b. The building, structure, object or site is characteristic of a significant period in the history of the city;
- c. The building, structure, object or site is associated with a significant person or event in the city.

(3) Contributive category.

The building, structure, object or site contributes to the overall character and history of a neighborhood or district and is a good example of period architecture.

5.2.3 ENVIRONMENTAL SETTING

Historic

Orange County contains prehistoric sites dating from 9,000 to 10,000 years ago that show signs of human presence. Sites from 6,000 to 1,000 BC (Milling Stone period) are common in the coastal region of Southern California and at many inland locations. Between 1,000 BC to 650 AD (Intermediate period), orientation of sites shifted toward hunting, maritime subsistence, and acorn processing. The late prehistoric period from 650 AD until European contact in 1769 included the introduction of pottery, triangular arrow points, and cremation practices.

In July of 1769, the valley in which Santa Ana is located was explored by those of European descent during a Franciscan expedition led by Don Gaspar Portola. In 1810, Antonio Yorba and his nephew, Juan Peralta, received a grant from the Spanish governor of California for all the land extending from the foothills of Santa Ana Canyon to the ocean. Santa Ana appeared as a township of Los Angeles County in the 1860 and 1870 censuses. In 1869, William H. Spurgeon purchased 70 acres from the Yorba heirs and drew up a town

plan, and the community was officially laid out later that year.¹ With the establishment of several ranches in the valley, the area soon became an agricultural center. Santa Ana evolved as a commercial center due to its central location in the valley and became a marketplace for crops produced in the surrounding region that is now Orange County. Agriculture continued to be the major industry throughout Orange County and Santa Ana until the second half of the twentieth century. Rail travel played a major factor in the development and expansion of Santa Ana in the nineteenth century, and in 1886, the City of Santa Ana was incorporated. Since World War II, Santa Ana has become the financial and governmental center of Orange County.

Through the 1950s and 1960s, the Project site was used for agricultural purposes. In 1972, the site began use for commercial uses. The Historic Resources Assessment (Appendix D) describes that by 1972, two buildings had been constructed, along with a large parking lot on the southeast portion of the site. By 1976, the southern portion of the site was developed with commercial buildings; and by 1977, 10 buildings had been constructed on the site along with surface parking lots. Since the original commercial development of the site various modifications have occurred.

The Historic Resource Assessment that was prepared for the proposed Project (Appendix D) describes that the site is currently developed with 16 buildings that are surrounded by surface parking areas and ornamental landscaping. The existing onsite buildings were constructed between 1972 and 2004, as shown on Table 5.2-1. As shown, Buildings A, B, C, D, E, F, and G were constructed more than 45 years ago.

Table 5.2-1: Existing Onsite Buildings

	Date of Construction	Address (Current and Historic)	Current Tenant(s)
Building A	1972	3900 South Bristol Street 1307 West Sunflower Avenue 1313 West Sunflower Avenue	Hobby Lobby, T.J. Maxx, Ross Dress for Less, World Market (1313), Red Robin (1307)
Building B	1972	3610 South Bristol Street 3640-3646 South Bristol Street (even numbers) 3650 South Bristol Street 3664-3674 South Bristol Street (even numbers) 3692-3698 South Bristol Street (even numbers) 3732-3752 South Bristol Street 3719-3785 South Plaza Drive	Vons
Building C	1974	3701 South Plaza Drive	Esporta Fitness
Building D	1973	3620 South Bristol Street	Variety of medical and dental offices
Building E	1972	3600-3600 ½ South Bristol Street	Chase Bank
Building F	1972	3606-3608 South Bristol Street	Wang Cho
Building G	1972	3730 South Bristol Street	Bank of America
Building H	2003	3638 South Bristol Street	Sleep Number
Building I	2001	3710 South Bristol Street	Jack in the Box
Building J	1984	1500 West MacArthur Street 3621 South Plaza Drive 3641 South Plaza Drive	Boiling Crab
Building K	1979	3814-3816 South Bristol Street	Plato's Closet, Aloha Hawaiian BBQ, Barbershop, Hair Salon
Building L	2004	3810 South Bristol Street	McDonald's
Building M	1978	3820 South Bristol Street	Robbins Brothers

¹ "Santa Ana: History," City-data.com

	Date of Construction	Address (Current and Historic)	Current Tenant(s)
Building N	1985	3930 South Bristol Street	Dentist, optometrist, salons, restaurants
Building O	1985	3940 South Bristol Street	Sankai Restaurant
Building P	1985	3950 South Bristol Street	Euro Caffè

Source: Historic Resources Assessment, Appendix D

Of the 16 buildings, 7 buildings were constructed more than 45 years ago and have been substantially altered since their original construction. The Historic Resource Assessment details that the Project site is not adjacent to any historic structures. Areas surrounding the site consist of modern multi-family residences and commercial buildings, including South Coast Plaza to the south.

Archaeologic

The chronology of coastal Southern California, which is inclusive of the Project area, is typically divided into three general time periods: the Early Holocene (11,000 to 8,000 Before Present [B.P.]), the Middle Holocene (8,000 to 4,000 B.P.), and the Late Holocene (4,000 B.P. to A.D. 1769). Sites dating from 9,000 to 10,000 years ago show evidence of human presence within the Orange County region. A review of geologic mapping as detailed in the Archaeological Resources Assessment (Appendix E) indicates that the Project area is underlain by young Quaternary deposits, dating from the Late Holocene to the Late Pleistocene (Qya). The Late Holocene is contemporaneous with the duration of known human occupation of the area.

A total of 16 cultural resources studies have been performed within a 0.5-mile radius of the Project site. Of these previous studies, one overlaps a small portion of the Project site. The records search conducted for the proposed Project identified one previously recorded prehistoric archaeological resource and three previously recorded historic-period archaeological isolates within 0.5-mile of the Project site. No archaeological or historic resources have been previously recorded within the Project site, as shown in Table 5.2-2.

Table 5.2-2: Previously Recorded Archaeological Resources

Primary No.	Permanent Trinomial	Description	Date Recorded	Eligibility	Location
P-30-001515	CA-ORA-001515	Prehistoric site - shell scatter	1999	Unknown	0.5 mile southeast
P-30-100342	-	Historic-period isolate	2002	Ineligible	0.4 mile northwest
P-30-100343	-	Historic-period isolate	2002	Ineligible	0.4 mile northwest
P-30-100344	-	Historic-period isolate	2002	Ineligible	0.4 mile northwest

Source: Archaeological Resources Assessment, Appendix E

5.2.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

- CUL-1 Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.
- CUL-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.
- CUL-3 Disturb any human remains, including those interred outside of formal cemeteries.

Historic Resources Thresholds

Historic resources are usually 50 years old or older and must meet at least one of the criteria for listing in the California Register (such as association with historical events, important people, or architectural significance), in addition to maintaining a sufficient level of physical integrity (CEQA Guidelines Section 15064.5[a][3]). Additionally, CEQA Guidelines Section 15064.5(b), states that a project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that would have a significant effect on the environment. A substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. The significance of a historical resource is materially impaired when a project:

- a) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- c) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

5.2.5 METHODOLOGY

Archaeological and Historic Records Search. An archaeological and historical records search was conducted at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Inventory System (CHRIS), located at California State University, Fullerton on September 20, 2022. This search included the Project site with an additional 0.5-mile buffer. In addition, archival research was done to obtain historical development information. This archival research included review of the National Register, the California Register, the Statewide Historical Resources Inventory, the City of Santa Ana's inventory of historic properties, data on land ownership, historical maps, historical aerial photographs from 1952 to present, construction histories, and City Directories.

Archaeological and Historic Field Surveys. A pedestrian survey was conducted at the Project site on October 6, 2022, consistent with the requirements set forth in Santa Ana GPU FEIR Mitigation Measure CUL-4. As the majority of the Project site is developed with structures, parking lots, and sidewalks, areas with visible ground surface totaling approximately 3 acres were subject to opportunistic survey.

The historic (built-environment) survey consisted of inspection of the exterior of buildings A, B, C, D, E, F, and G as they were constructed over 45 years ago. The survey assessed the buildings' current conditions and documented evidence of renovations or alterations. Photographs were taken of each of the buildings as part of the documentation process. A description of each structure's style, design and method of construction was recorded on California Department of Parks and Recreation (DPR) Series 523 forms.

Subsurface Archaeological Sensitivity Assessment. A desktop analysis was conducted to assess the potential for subsurface archaeological resources within the Project area. Sources reviewed as part of the

desktop analysis include geologic maps and soil maps, the SCCIC records search results, the geotechnical report for the proposed Project, and the historic map and aerial review.

5.2.6 ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the GPU FEIR

The GPU FEIR addressed impacts related to cultural resources in Chapter 5.4. The GPU FEIR described that certain development pursuant to the GPU may not be able to avoid impacts to historical resources. However, the GPU FEIR described that the South Bristol Street focus area has a low potential to contain built environment historical resources. Mitigation Measures CUL-1 and CUL-2 were included to reduce most impacts to a less than significant level, and Mitigation Measure CUL-3 would reduce impacts to the extent feasible; however, GPU impacts to historic resources would be significant and unavoidable.

The GPU FEIR describes that development involving ground disturbance has the potential to impact known and unknown archaeological resources, and details that eight archaeological resources have been recorded in the City. The GPU FEIR determined that there is a moderate likelihood that intact subsurface archaeological resources would be encountered during redevelopment and included Mitigation Measures CUL-4 through CUL-7 to reduce potential individual and cumulative impacts associated with future development and redevelopment. Mitigation Measure CUL-4 requires an archaeological resources assessment be conducted for future development projects to identify any known archaeological resources and sensitivity of a site. Mitigation Measures CUL-5 through CUL-7 detail the next steps required should the archaeological resources assessment identify known resources or determine the site to have high or moderate resource sensitivity. The GPU FEIR determined that upon compliance with Mitigation Measures CUL-4 through CUL-7, individual and cumulative impacts to archaeological resources would be reduced to less than significant levels. The GPU FEIR determined that the likelihood that human remains may be discovered during clearing and grading activities is considered extremely low. In the unlikely event human remains are uncovered, impacts would be less than significant upon compliance with California and Safety Code Section 7050.5.

Proposed Specific Plan Project

IMPACT CUL-1: THE PROJECT WOULD NOT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A HISTORICAL RESOURCE PURSUANT TO CEQA GUIDELINES SECTION 15064.5.

No Impact. According to the *State CEQA Guidelines*, a historical resource is defined as something that meets one or more of the following criteria:

- 1) Listed in, or determined eligible for listing in, the California Register of Historical Resources;
- 2) Listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k);
- 3) Identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g); or
- 4) Determined to be a historical resource by the project's Lead Agency.

PRC Section 5024.1 directs evaluation of historical resources to determine their eligibility for listing on the CRHR. The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing on the NRHP, enumerated above, and require similar protection to what NHPA Section 106 mandates for historic properties. According to PRC Section 5024.1(c)(1-4), a resource is considered historically significant if it meets at least one of the following criteria:

- 1) Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States;
- 2) Associated with the lives of persons important to local, California or national history;
- 3) Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values; or
- 4) Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

As described previously, the Project site is currently developed with 16 commercial buildings, seven of which were constructed more than 45 years ago. As such, pursuant to GPU FEIR Mitigation Measure CUL-1, a historical resource assessment was prepared for Buildings A, B, C, D, E, F, and G.

Building A: 3900 South Bristol Street, 1307 and 1313 Sunflower Avenue

According to the Historic Resource Assessment, based on aerial photographs, Building A was the first structure constructed on the Project site in 1972 for use by the JCPenney Company. Since circa 1980, Building A has been in use as a multi-retail space for a variety of retail chains and restaurants. The current stores located in Building A and Building A itself do not retain a significant role in history related to retail or the expansion of the City of Santa Ana. Therefore, the Historical Resource Assessment determined that Building A does not appear to meet the eligibility requirements under National Register Criterion A or California Register Criterion 1.

Building A is not identified with historic individuals or events of national, state, or local history and is not associated with significant individual owners or occupants. Therefore, the Historical Resource Assessment determined that Building A does not appear to meet the eligibility requirements under National Register Criterion B or California Register Criterion 2.

Building A is not related to any historically significant architects, construction companies, or developers. It does not have a distinctive design or expression of any style, and currently exhibits a generic post-modern commercial appearance. While the building maintains some original character-defining features, these features are not distinguishing or unique. Therefore, the Historical Resource Assessment determined that Building A does not appear to meet the eligibility requirements under National Register Criterion C or California Register Criterion 3.

Building A does not appear to yield significant information that would expand current knowledge or theories of design, methods of construction, operation, or other information that is not already known. Therefore, the Historical Resource Assessment determined that Building A does not appear to meet the eligibility requirements under National Register Criterion D or California Register Criterion 4.

In addition, Building A does not meet any of the requirements set forth by the City of Santa Ana to be considered a historic resource. As such, Building A is not eligible for listing as a historic resource by the City of Santa, the state, or nationally (Appendix D).

Building B: 3610 South Bristol Street, 3640 – 3646 South Bristol Street (even numbers), 3650 South Bristol Street, 3664 – 3674 South Bristol Street (even numbers), 3692 – 3698 South Bristol Street (even numbers), 3732 – 3752 South Bristol Street (even numbers), and 3719 – 3785 South Plaza Drive

The Historic Resource Assessment (Appendix D) describes that Building B was constructed in 1973 by the Southern California branch of Winmar Company. The stores located in Building B and Building B itself do not retain a significant role in history related to retail or the expansion of the City of Santa Ana. In addition, Building B is similar to many other strip malls in the Southern California region. Therefore, the Historical Resource Assessment determined that Building B does not appear to meet the eligibility requirements under National Register Criterion A or California Register Criterion 1.

Building B is not identified with historic individuals or events of national, state, or local history and is not associated with significant individual owners or occupants. Therefore, the Historical Resource Assessment determined that Building B does not appear to meet the eligibility requirements under National Register Criterion B or California Register Criterion 2.

Building B is not related to any historically significant architects, construction companies, or developers. While Building B includes features of the Contemporary Spanish Colonial Revival style, including a horizontal massing, a parapet roof, and decorative detailing that includes red clay tile, it is not a distinctive or unique design, nor is it an outstanding expression of the style. In addition, this style is similar to many other strip malls in Southern California. Also, significant alterations in 2011 and 2014 have changed the original layout and formation of the building, and the building no longer retains integrity from the date of its original construction. Therefore, the Historical Resource Assessment determined that Building B does not appear to meet the eligibility requirements under National Register Criterion C or California Register Criterion 3.

Building B does not appear to yield significant information that would expand current knowledge or theories of design, methods of construction, operation, or other information that is not already known. Therefore, the Historical Resource Assessment determined that Building B does not appear to meet the eligibility requirements under National Register Criterion D or California Register Criterion 4.

In addition, Building B does not meet any of the requirements set forth by the City of Santa Ana to be considered a historic resource. As such, Building B is not eligible for listing as a historic resource by the City of Santa, the state, or nationally (Appendix D).

Building C: 3701 South Plaza Drive

Building C was constructed in 1974 and designed as a multi-screen movie theater for the Edwards Cinemas Circuit. Edwards Cinemas was a historic independent theater company, originally founded in California in 1930. While the Edwards Cinemas company is potentially significant for the early development of the theater industry in the United States and its expansion in Southern California and Orange County specifically, Building C was sold by the company circa 2000 and is no longer in use as a theater. More importantly, Building C is not a significant example of an Edwards Cinemas theater. Therefore, the Historical Resource Assessment determined that Building C does not appear to meet the eligibility requirements under National Register Criterion A or California Register Criterion 1. The building is currently a fitness center.

While James Edwards, Sr. is a potentially significant figure in the development of the multi-screen movie theater in Southern California, the Historic Resource Assessment was unable to uncover a specific connection between him and Building C. As such, Building C is not identified with historic individuals or events of national, state, or local history and is not associated with significant individual owners or occupants. Therefore, the Historical Resource Assessment determined that Building C does not appear to meet the eligibility requirements under National Register Criterion B or California Register Criterion 2.

Building C is not related to any historically significant architects, construction companies, or developers and the structure was expanded in 2000. While Building B includes features of the Mission Revival style, including smooth stucco walls, a parapet roof, limited fenestration, and decorative detailing that includes red clay tile, it is not a distinctive or unique design, nor is it an outstanding expression of the style. However, Building C is a utilitarian and commercial example of the Mission Revival style. There are numerous other and better examples of the Mission Revival style throughout Southern California and the western United States. Examples in Santa Ana include the Bowers Museum at 2002 North Main Street (1936), Santa Ana Fire Station No. 1 at 1322 North Sycamore Street (1929), and the U.S. Post Office (Spurgeon Station) located at 615 North Bush Street (1931). Additionally, significant alterations in 2000 have changed the original layout and formation of the building, and the building no longer retains integrity from the date of its original

construction. Therefore, the Historical Resource Assessment determined that Building C does not appear to meet the eligibility requirements under National Register Criterion C or California Register Criterion 3.

Building C does not appear to yield significant information that would expand current knowledge or theories of design, methods of construction, operation, or other information that is not already known. Therefore, the Historical Resource Assessment determined that Building C does not appear to meet the eligibility requirements under National Register Criterion D or California Register Criterion 4.

In addition, Building C does not meet any of the requirements set forth by the City of Santa Ana to be considered a historic resource. As such, Building C is not eligible for listing as a historic resource by the City of Santa, the state, or nationally (Appendix D).

Building D: 3620 South Bristol Street

Building D was originally constructed in July 1973 as a three-story multi-tenant medical and dental office building. It remains in use as a medical and dental office building. While numerous tenants located at Building D have provided services to the residents of Santa Ana for almost 50 years, there are many similar medical and dental practices throughout Orange County and the broader United States. The building has never functioned as a research facility, and no significant medical discoveries or breakthroughs have occurred at the building. Tenants have consistently been small businesses that have not played a prominent role in the broader medical and dental communities of Santa Ana and Orange County. Research did not identify historical events occurring at the subject property that would rise to the level of significance required for national or state listing. Therefore, the Historical Resource Assessment determined that Building D does not appear to meet the eligibility requirements under National Register Criterion A or California Register Criterion 1.

Building D is not identified with historic individuals or events of national, state, or local history and is not associated with significant individual owners or occupants. Therefore, the Historical Resource Assessment determined that Building B does not appear to meet the eligibility requirements under National Register Criterion D or California Register Criterion 2.

Building D is not related to any historically significant architects, construction companies, or developers. While Building B includes features of the Mid-Century Spanish Colonial Revival style, including a parapet roof, interior courtyard, and red clay tile, it is not an outstanding expression of the style. While Building D is a unique commercial rendering of the style that retains its original character-defining features, it does not possess a high artistic or aesthetic value. There are numerous other and better examples of the Contemporary Spanish Colonial Revival style throughout Southern California, as it was widespread during the suburban development of the area. Some of these in Santa Ana include the St. Anne Catholic Church and associated buildings at 1344 South Main Street in Santa Ana (1941-1945); the Orange County Fire Authority Station No. 74 at 1439 South Broadway (1955); and the Santa Ana Regional Transportation Center (1985). Therefore, the Historical Resource Assessment determined that Building D does not appear to meet the eligibility requirements under National Register Criterion C or California Register Criterion 3.

Building D does not appear to yield significant information that would expand current knowledge or theories of design, methods of construction, operation, or other information that is not already known. Therefore, the Historical Resource Assessment determined that Building D does not appear to meet the eligibility requirements under National Register Criterion D or California Register Criterion 4.

In addition, Building D does not meet any of the requirements set forth by the City of Santa Ana to be considered a historic resource. As such, Building D is not eligible for listing as a historic resource by the City of Santa, the State, or nationally.

Building E: 3600–3600 1/2 South Bristol Street (Chase Bank building)

Building E was constructed in 1972 as a branch of Marina Federal Savings & Loan. The Historic Resource Assessment (Appendix D) describes that Building E does not retain a significant place in the broad patterns of financial and development history within Southern California, and the building property is not particularly notable for any of the financial institutions that have occupied the building. Therefore, the Historical Resource Assessment determined that Building E does not appear to meet the eligibility requirements under National Register Criterion A or California Register Criterion 1.

Building E is not identified with historic individuals or events of national, state, or local history and is not associated with significant individual owners or occupants. Therefore, the Historical Resource Assessment determined that Building E does not appear to meet the eligibility requirements under National Register Criterion B or California Register Criterion 2.

Building E is not related to any historically significant architects, construction companies, or developers. Building E is a good example of the Spanish Colonial Revival style, but it is not a distinctive design or expression of the style. While the building retains its original character-defining features, these features are ubiquitous in most Spanish Colonial Revival designs and are not distinguishing or unique characteristics. The structure was not conceived as a showcase building for the company or the architectural style but rather one of numerous branch offices in Orange County. Therefore, the Historical Resource Assessment determined that Building E does not appear to meet the eligibility requirements under National Register Criterion C or California Register Criterion 3.

Building E does not appear to yield significant information that would expand current knowledge or theories of design, methods of construction, operation, or other information that is not already known. Therefore, the Historical Resource Assessment determined that Building E does not appear to meet the eligibility requirements under National Register Criterion D or California Register Criterion 4.

In addition, Building E does not meet any of the requirements set forth by the City of Santa Ana to be considered a historic resource. As such, Building E is not eligible for listing as a historic resource by the City of Santa Ana, the state, or nationally.

Building F: 3606–3608 South Bristol

Building F was constructed in 1974 as a restaurant space and remains in use as a restaurant. The building represents a typical restaurant space in a suburban community such as Santa Ana and has been occupied by both locally based companies and chain franchises. While the various restaurants that have been located at Building F have provided many dining opportunities for the residents of Santa Ana, they have played no larger role in the history of the community. Building F is not a significant franchise in the company history of these chain restaurants. Therefore, the Historical Resource Assessment determined that Building F does not appear to meet the eligibility requirements under National Register Criterion A or California Register Criterion 1.

Building F is not identified with historic individuals or events of national, state, or local history and is not associated with significant individual owners or occupants. Therefore, the Historical Resource Assessment determined that Building F does not appear to meet the eligibility requirements under National Register Criterion B or California Register Criterion 2.

Building F is not related to any historically significant architects, construction companies, or developers. It does not possess high artistic or aesthetic value nor is it a unique method of construction. Further, the building has had multiple stylistic modifications since its original construction and extensive renovations, including the addition of a patio and significant interior renovations, which occurred in 1989, 2005, 2012, and 2019 have resulted in the loss of integrity of the original structure. Therefore, the Historical Resource Assessment

determined that Building F does not appear to meet the eligibility requirements under National Register Criterion C or California Register Criterion 3.

Building F does not appear to yield significant information that would expand current knowledge or theories of design, methods of construction, operation, or other information that is not already known. Therefore, the Historical Resource Assessment determined that Building F does not appear to meet the eligibility requirements under National Register Criterion D or California Register Criterion 4.

In addition, Building F does not meet any of the requirements set forth by the City of Santa Ana to be considered a historic resource. As such, Building F is not eligible for listing as historic resource by the City of Santa, the state, or nationally.

Building G: 3730 South Bristol Street

Building G was originally constructed in 1972 as a branch of Security Pacific National Bank, which was originally founded as the Farmers and Merchants Bank of Los Angeles. Farmers and Merchants Bank merged with Security First National Bank in 1956 and again merged with Pacific National Bank of San Francisco in 1961 to become Security Pacific National Bank. While the bank retains a significant place in the broad patterns of financial and development history within Southern California, Building G is not notable in the company's history. At the time of its construction, Building G was one of many branches constructed by the bank that year alone and is not a notable example of the expansion of the company. Therefore, the Historical Resource Assessment determined that Building G does not appear to meet the eligibility requirements under National Register Criterion A or California Register Criterion 1.

Building G is not identified with historic individuals or events of national, state, or local history and is not associated with significant individual owners or occupants. Therefore, the Historical Resource Assessment determined that Building G does not appear to meet the eligibility requirements under National Register Criterion B or California Register Criterion 2.

Building G is not related to any historically significant architects, construction companies, or developers. While Building G includes features of the Mid-Century Spanish Colonial Revival style with Asian influences, including a horizontal massing, a red clay tile roof, and decorative detailing, it is not a distinctive or unique design, nor is it an outstanding expression of the style. In addition, this style is similar to many other bank branches within Southern California. Therefore, the Historical Resource Assessment determined that Building G does not appear to meet the eligibility requirements under National Register Criterion C or California Register Criterion 3.

Building G does not appear to yield significant information that would expand current knowledge or theories of design, methods of construction, operation, or other information that is not already known. Therefore, the Historical Resource Assessment determined that Building G does not appear to meet the eligibility requirements under National Register Criterion D or California Register Criterion 4.

In addition, Building G does not meet any of the requirements set forth by the City of Santa Ana to be considered a historic resource. As such, Building B is not eligible for listing as historic resource by the City of Santa, the state, or nationally.

Therefore, none of the existing buildings onsite meet any of the historic resource criteria and do not meet the definition of a historical resource pursuant to CEQA or the City of Santa Ana. Thus, impacts related to historic resources would not occur. Therefore, Project impacts would be less than those disclosed in the GPU FEIR, which were determined to be significant and unavoidable despite inclusion of mitigation.

IMPACT CUL-2: THE PROJECT WOULD NOT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO CEQA GUIDELINES SECTION 15064.5.

Less than Significant Impact with Mitigation Incorporated. As described previously, the Project site was used for agricultural uses until the early-1970s when commercial buildings were developed on the site. Thus, the site has been previously disturbed from both agricultural uses and development, including ground disturbance to depths for installation of the existing utility infrastructure that serves the site. As required by GPU FEIR Mitigation Measure CUL-4, an Archaeological Resources Assessment Report was prepared for the proposed Project to analyze the potential archaeological sensitivity of the Project site and the potential for Project ground disturbance to result in impacts to archaeological resources.

Based on the SCCIC records search results and archaeological survey of the Project site, no archaeological resources have been identified within or immediately adjacent to the proposed Project site. However, the Archaeological Resources Assessment Report determined that due to the Holocene age of onsite soils, the presence of known archaeological and historical resources within 0.5-mile from the Project site, and the former presence of agricultural-related structures onsite, the Project area is sensitive for prehistoric and historic-period archaeological deposits (ESA, 2023b).

As described in Section 3.0, *Project Description*, construction activities within the Project site include demolition of the existing buildings; removal of the existing infrastructure and landscaping; and grading and excavation to depths of 30 feet below ground surface for construction of subterranean parking areas and installation of infrastructure. As the Project site is sensitive for previously unknown archaeological resources, the Archaeological Resources Assessment Report (Appendix E) determined that GPU FEIR Mitigation Measure CUL-6 would be required to be implemented to require an archaeologist to be retained for monitoring throughout proposed Project ground disturbing activities. In addition, the proposed Project would be required to implement Project-specific Mitigation Measure CR-1, which sets forth requirements should archaeological resources be uncovered during proposed Project activities, and Project-specific Mitigation Measure CR-2, which preparation of a monitoring report after the completion of monitoring activities. With implementation of GPU FEIR Mitigation Measure CUL-6 and Project-specific Mitigation Measures CR-1 and CR-2, impacts would be less than significant. Therefore, impacts related to Project buildout of the site would be consistent with the impact conclusions set forth in the GPU FEIR, which determined that impacts to archaeological resources would be less than significant after implementation of mitigation.

IMPACT CUL-3: THE PROJECT WOULD NOT DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF FORMAL CEMETERIES.

Less than Significant Impact. The Project site has been extensively disturbed, as described above, and has not been previously used as a cemetery. Thus, impacts related to known human remains are less than significant. However, in the unanticipated event that human remains are found during proposed Project construction activities, compliance with California Health and Safety Code Section 7050.5 would ensure that human remains are treated with dignity and as specified by law, which would reduce the impact to a less than significant level.

As specified by California Health and Safety Code Section 7050.5, if human remains are found on the Project site, the County Coroner's office shall be immediately notified and no further excavation or disturbance of the discovery or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code 5097.98. If the Coroner recognizes the remains to be Native American, he or she shall contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC will make a determination as to the Most Likely Descendent. The existing California Health and Safety Code regulations

provide that impacts related to potential disturbance of human remains are less than significant. Therefore, impacts related to Project buildout of the site would be consistent with the impact conclusions set forth in the GPU FEIR, which determined that impacts to human remains would be less than significant.

5.2.7 CUMULATIVE IMPACTS

Historic Resources: The proposed Project's contribution to cumulative impacts to historical resources was analyzed in context with past and reasonably foreseeable future projects in the City of Santa Ana and adjacent areas in Costa Mesa that were similarly influenced by the historical agricultural and then commercial and residential uses in the region. The cumulative impacts are evaluated in light of development projections in the City's GPU and GPU FEIR that evaluates conditions contributing to the cumulative effect and describes that the South Bristol Street Focus Area has a low potential to contain built environment historical resources.

As detailed previously, the record searches and field surveys indicate that there are no structures on the Project site or adjacent properties that would qualify as historic resources, and no impacts related to historic resources would occur. Therefore, implementation of the proposed Project would have no potential to contribute towards a significant cumulative impact to historical sites and/or resources. Thus, cumulative impacts from the proposed Project would be less than significant.

Archaeological Resources: The cumulative study area for archaeological resources includes the Southern California region, which contains the same general prehistoric uses and migration trends as the Project area. The cumulative impacts are evaluated in light of development projections in the City's GPU and GPU FEIR that evaluate conditions contributing to the cumulative effects to archaeological resources. As described previously, there is a possibility that ground-disturbing activities during Project construction may uncover or disturb unknown archaeological resources. However, the proposed Project would implement GPU FEIR Mitigation Measures CUL-6 and Project-specific Mitigation Measures CR-1 and CR-2 that would reduce the potential impact to unknown resources to a less than significant level. The likelihood of uncovering multiple currently unknown resources within the Project site that is sufficient to create a significant cumulative impact is low given the built nature of the Project site and City of Santa Ana and few archaeological resources that have been found in the vicinity to date. With compliance with Project-specific mitigation, cumulatively considerable impacts would be less than significant.

Disturbance of Human Remains: Mandatory compliance with the provisions of California Health and Safety Code Section 7050.5, Public Resources Code Section 5097 et seq., and CEQA Guidelines Section 15064.5 would assure that the Project, in addition to all development projects, treat human remains that may be uncovered during development activities in accordance with prescribed, respectful, and appropriate practices, thereby avoiding significant cumulative impacts.

5.2.8 EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS, OR POLICIES

- California Health and Safety Code Section 7050.5
- Public Resources Code Section 5097.98

5.2.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impact CUL-1 would be less than significant.

Without mitigation, the following impacts would be potentially significant:

- Impact CUL-2: Project construction activities could impact archaeological resources.
- Impact CUL-3: Project construction activities could disturb human remains.

5.2.10 MITIGATION MEASURES

GPU FEIR Mitigation Measures

CUL-1 Identification of Historical Resources and Potential Project Impacts. For structures 45 years or older, a Historical Resources Assessment (HRA) shall be prepared by an architectural historian or historian meeting the Secretary of the Interior's Professional Qualification Standards. The HRA shall include: definition of a study area or area of potential effect, which will encompass the affected property and may include surrounding properties or historic district(s); an intensive level survey of the study area to identify and evaluate under federal, State, and local criteria significance historical resources that might be directly or indirectly affected by the proposed project; and an assessment of project impacts. The HRA shall satisfy federal and state guidelines for the identification, evaluation, and recordation of historical resources. An HRA is not required if an existing historic resources survey and evaluation of the property is available; however, if the existing survey and evaluation is more than five years old, it shall be updated.

Proposed Project Applicability: Mitigation Measure CUL-1 is applicable to the proposed Project and has been completed. The Project's Historic Resource Assessment has been completed and is provided in Appendix D.

CUL-2 Use of the Secretary of the Interior's Standards. The Secretary of the Interior's Standards for the Treatment of Historic Properties shall be used to the maximum extent practicable to ensure that projects involving the relocation, conversion, rehabilitation, or alteration of a historical resource and its setting or related new construction will not impair the significance of the historical resource. Use of the Standards shall be overseen by an architectural historian or historic architect meeting the Secretary of the Interior's Professional Qualification Standards. Evidence of compliance with the Standards shall be provided to the City in the form of a report identifying and photographing character-defining features and spaces and specifying how the proposed treatment of character-defining features and spaces and related construction activities will conform to the Standards. The Qualified Professional shall monitor the construction and provide a report to the City at the conclusion of the project. Use of the Secretary's Standards shall reduce the project impacts on historical resources to less than significant.

Proposed Project Applicability: Mitigation Measure CUL-2 is not applicable to the proposed Project because the Project does not involve relocation, conversion, rehabilitation, or alteration of a historical resource.

CUL-3 Documentation, Education, and Memorialization. If the City determines that significant impacts to historical resources cannot be avoided, the City shall require, at a minimum, that the affected historical resources be thoroughly documented before issuance of any permits and may also require additional public education efforts and/or memorialization of the historical resource. Though demolition or alteration of a historical resource such that its significance is materially impaired cannot be mitigated to a less than significant level, recordation of the resource will reduce significant adverse impacts to historical resources to the maximum extent feasible. Such recordation should be prepared under the supervision of an architectural historian, historian, or historic architect meeting the Secretary of the Interior's Professional Qualification Standards and should take the form of Historic American Buildings Survey (HABS) documentation. At a minimum, this recordation should include an architectural and historical narrative; archival photographic documentation; and

supplementary information, such as building plans and elevations and/or historic photographs. The documentation package should be reproduced on archival paper and should be made available to researchers and the public through accession by appropriate institutions such as the Santa Ana Library History Room, the South Central Coastal Information Center at California State University, Fullerton, and/or the HABS collection housed in the Library of Congress. Depending on the significance of the adversely affected historical resource, the City, at its discretion, may also require public education about the historical resource in the form of an exhibit, web page, brochure, or other format and/or memorialization of the historical resource on or near the proposed project site. If memorialized, such memorialization shall be a permanent installation, such as a mural, display, or other vehicle that recalls the location, appearance, and historical significance of the affected historical resource, and shall be designed in conjunction with a qualified architectural historian, historian, or historic architect.

Proposed Project Applicability: Mitigation Measure CUL-3 is not applicable to the proposed Project because the Project does not involve impacts to a historical resource.

CUL-4 For projects with ground disturbance—e.g., grading, excavation, trenching, boring, or demolition that extend below the current grade—prior to issuance of any permits required to conduct ground-disturbing activities, the City shall require an Archaeological Resources Assessment be conducted under the supervision of an archaeologist that meets the Secretary of the Interior’s Professionally Qualified Standards in either prehistoric or historic archaeology.

Assessments shall include a California Historical Resources Information System records search at the South Central Coastal Information Center and of the Sacred Land Files maintained by the Native American Heritage Commission. The records searches will determine if the proposed project area has been previously surveyed for archaeological resources, identify and characterize the results of previous cultural resource surveys, and disclose any cultural resources that have been recorded and/or evaluated. If unpaved surfaces are present within the project area, and the entire project area has not been previously surveyed within the past 10 years, a Phase I pedestrian survey shall be undertaken in proposed project areas to locate any surface cultural materials that may be present.

Proposed Project Applicability: Mitigation Measure CUL-4 is applicable to the proposed Project and an Archaeological Resources Assessment has been prepared and is included in Appendix E.

CUL-5 If potentially significant archaeological resources are identified, and impacts cannot be avoided, a Phase II Testing and Evaluation investigation shall be performed by an archaeologist who meets the Secretary of the Interior’s Standards to determine significance prior to any ground-disturbing activities. If resources are determined significant or unique through Phase II testing, and site avoidance is not possible, appropriate site-specific mitigation measures shall be undertaken. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the Office of Historical Preservation’s “Archaeological Resource Management Reports (ARMR): Recommended Contents and Format” (OHP 1990) and “Guidelines for Archaeological Research Designs” (OHP 1991).

Proposed Project Applicability: Mitigation Measure CUL-5 is not applicable to the proposed Project as the Archaeological Resources Assessment conducted for the Project did not identify any potentially significant archaeological resources onsite.

CUL-6 If the archaeological assessment did not identify archaeological resources but found the area to be highly sensitive for archaeological resources, a qualified archaeologist and a Native American

monitor approved by a California Native American Tribe identified by the Native American Heritage Commission as culturally affiliated with the project area shall monitor all ground-disturbing construction and pre-construction activities in areas with previously undisturbed soil of high sensitivity. The archaeologist shall inform all construction personnel prior to construction activities of the proper procedures in the event of an archaeological discovery. The training shall be held in conjunction with the project's initial onsite safety meeting and shall explain the importance and legal basis for the protection of significant archaeological resources. The Native American monitor shall be invited to participate in this training. In the event that archaeological resources (artifacts or features) are exposed during ground-disturbing activities, construction activities in the immediate vicinity of the discovery shall be halted while the resources are evaluated for significance by an archaeologist who meets the Secretary's Standards. and This will include tribal consultation and coordination with the Native American monitor in the case of a prehistoric archaeological resource or tribal resource. If the discovery proves to be significant, the long-term disposition of any collected materials should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.

Proposed Project Applicability: Mitigation Measure CUL-6 is applicable to the proposed Project as determined by the Archaeological Resources Assessment Report (Appendix E) because the site has been determined to be sensitive for archaeological resources. This measure will be included in the Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project.

CUL-7 If an Archaeological Resources Assessment does not identify potentially significant archaeological resources but the site has moderate sensitivity for archaeological resources (Mitigation Measure CUL-4), an archaeologist who meets the Secretary's Standards shall be retained on call. The archaeologist shall inform all construction personnel prior to construction activities about the proper procedures in the event of an archaeological discovery. The pre-construction training shall be held in conjunction with the project's initial onsite safety meeting and shall explain the importance and legal basis for the protection of significant archaeological resources. In the event that archaeological resources (artifacts or features) are exposed during ground-disturbing activities, construction activities in the immediate vicinity of the discovery shall be halted while the on-call archaeologist is contacted. The resource shall be evaluated for significance and tribal consultation shall be conducted, in the case of a tribal resource. If the discovery proves to be significant, the long-term disposition of any collected materials should be determined in consultation with the affiliated tribe(s), where relevant.

Proposed Project Applicability: Mitigation Measure CUL-7 is not applicable to the proposed Project as the Archaeological Resources Assessment conducted for the Project has a high sensitivity for archaeological resources, necessitating archaeological monitoring as included in Mitigation Measure CUL-6.

Proposed Specific Plan Project Mitigation Measures

MM CR-1 If a resource is determined significant, the Project Applicant, qualified archaeologist, and tribal monitors (as included in MM TCR-1) Native American tribal representative shall meet and confer regarding the treatment measures and mitigation for such resources. Pursuant to PRC Section 21083.2(b), avoidance is the preferred method of preservation for archaeological resources and may include deeding archaeological resources into permanent conservation easements or planning parks, greenspace, or other open space to incorporate archaeological resources. If preservation in place or avoidance is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent

laboratory processing and analysis of the artifacts that are recovered. The methods and results of the data recovery excavations shall be included in the monitoring report that is described in MM CR-2. The report shall include a description of resources recovered, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. Construction activities in the immediate vicinity of the discovery can resume once the fieldwork component of the treatment measures has been implemented. These treatment measures and mitigation shall reduce any significant impacts by ensuring that either the resource is preserved in place or is removed prior to its destruction by construction activities.

MM CR-2 After monitoring has been completed, the qualified archaeologist shall prepare a monitoring report that details the results of monitoring activities, which shall be submitted to the City and to the SCCIC at the University California, Fullerton.

5.2.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of GPU FEIR Mitigation Measure CUL-6 and Project-specific Mitigation Measures CR-1 and CR-2, and compliance with the goals and policies of the Santa Ana GPU, Project impacts to cultural resources would be less than significant.

REFERENCES

City of Santa Ana General Plan Update. April 2022. Accessed: <https://www.santa-ana.org/general-plan-documents/>

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