

thirtieth street architects inc.

founding principals
john c. loomis, architect
james c. wilson, architect

principal
elwood l. gulley, architect

April 28, 2025

Mr. Brad Campbell
Campbell Ins. and Fin. Services Inc.
President
4815 Main Street
Yorba Linda, CA 92886

Re: Property at 4815 Main Street, Yorba Linda

Dear Brad,

Attached is our Architectural Historian, Pam Daly's Historical Assessment Letter Report of proposed alterations to your offices at 4815 Main Street, Yorba Linda. Furthermore, we have reviewed the Structural Conditions Assessment prepared by Grimm and Chen Structural Engineering, Inc.

Ms. Daly has identified three options for your consideration:

- A. Demolition of the entire building and construction of a new, larger building; or
- B. Retention of the entire front façade, demolition of the rest of the building, and construction of a longer building that attaches to the existing storefront; or
- C. Retain the original portion of the building, demolish the addition, and construct a new, longer addition.

Evaluation of the Options:

Option A – This option is problematic because it would result in a substantial adverse effect that would require the preparation of an Environmental Impact Report (EIR). This process is very costly and could add up to a year or more in governmental processing. As a result, we do not recommend this option.

Option B – Given the findings of severe water damage per the Structural Conditions Assessment Report, we feel this Option is the best path to take because it avoids the finding of substantial adverse effect and the EIR by retaining and restoring the original historic façade, while allowing the removal and construction of new and larger “state-of-the-art” offices. The existing storefront can be attached to a new

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Re: Property at 4815 Main Street, Yorba Linda

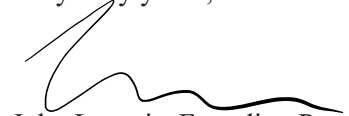
steel moment frame directly behind the storefront – providing lateral strength to resist seismic forces in what is a wall-to-wall glass wall.

Option C – Although Option C avoids the preparation of an EIR, it does require the repair of the heavily water damaged offices. This type of repair can be very expensive and problematic in terms of longevity and future maintenance costs. We have a lot of experience with Grimm and Chen and feel their Report is clearly a warning to avoid this Option.

Again, please find Ms. Daly's Historical Assessment Letter Report attached as well as a description of her Historic Preservation Services – for your review and comment. (Note – that we will not submit her findings to the City until after your review and approval.)

Please feel free to call me with any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read 'John Loomis', with a stylized, wavy line extending from the end of the signature.

John Loomis, Founding Partner
thirtieth street architects, inc.

Cellphone # 949-274-1092



951 E. Beacon Drive, Eugene, OR 97404
(951) 369-1366 ■ daly.rvrsde@sbcglobal.net

April 24, 2025

City of Yorba Linda
Planning Department
4845 Casa Loma Avenue
Yorba Linda, CA 92886

Re: 4815 Main Street, Yorba Linda, Orange County

Dear Sir or Madam;

Pamela Daly, Principal Architectural Historian of Daly & Associates, has prepared this letter report regarding the proposed alterations to the interior and exterior of the building located at 4815 Main Street in the City of Yorba Linda, California. The property is currently used as the office of State Farm Insurance. Ms. Daly is teamed with John Loomis, Principal Architect of Thirtieth Street Architects from Newport Beach, CA, for this review.

The building at 4815 Main Street is listed as a property contributing to the Main Street Historic District in Yorba Linda (Status Code 5D3), as identified in the *City of Yorba Linda Citywide Historic Property Survey: Historic Context & Survey Report* (HPS), adopted in 2010. The survey, documentation, and evaluation of the historic built-environment in Yorba Linda was prepared by Galvin Preservation Associates, Inc. (GPA), under the auspices of a team of architectural historians that meet the *Secretary of the Interior's Professional Standards* for Historians and Architectural Historians. The survey and evaluations were performed in accordance with the evaluation instructions and classification system prescribed by the California Office of Historic Preservation in its *Instructions for Recording Historical Resources*.¹ The study by GPA was performed to identify those built-environment resources in Yorba Linda eligible for listing in the National Register of Historic Places (National Register), California Register of Historical Resources (California Register), or designated as a local historical resource in the City of Yorba Linda.

In 2010, the subject building was recorded in the HPS as a property potentially eligible on a local level for being a contributor to Yorba Linda's Main Street Historic District. Based upon our site visit, we were able to determine that the subject building would be eligible for listing in the National Register of Historic Places and/or the California Register of Historical Resources under Criterion A/1 and C/3 for its association with the historic commercial district and as a rare example of a one-story, "Western false front" type building with Italianate style influence on its front (street) façade. The building has retained a significant amount of its physical integrity that includes its design, materials, workmanship, location, setting, feeling, and association.

The California Environmental Quality Act (CEQA) states that a property determined to be eligible for listing in the National Register is considered a historical resource for the purposes of CEQA. A property that is eligible for listing in the National Register is automatically eligible for being listed in the California

¹ California Office of Historic Preservation "Instructions for Recording Historical Resources":
<https://ohp.parks.ca.gov/pages/1054/files/manual95.pdf>

Register, and is thereby allowed to employ the use of the *California Historic Building Code (Title 24, Part 8)* to preserve its physical attributes.² The first edition of the CHBC was codified in October 1979.³

*The CHBC is intended to save California's architectural heritage by recognizing the unique construction issues inherent in maintaining and adaptively reusing historic buildings. The CHBC provides alternative building regulations for permitting repairs, alterations and additions necessary for the preservation, rehabilitation, relocation, related construction, change of use, or continued use of a "qualified historical building or structure."*⁴

The proposed project for the building at 4815 Main Street calls for its demolition due to the likelihood of the building being unable to meet the 2022 California Building Codes for new construction.

Our recommendation that the building at 4815 Main Street be inspected by an architect and/or engineer that specializes in the preservation, rehabilitation, relocation, related construction, change of use of historic properties. Yorba Linda's Main Street Historic District has only two buildings that have retained their facades that date from the early 1900s, and the agricultural history of the City. The City has stated in the *Yorba Linda Town Center Specific Plan (Ordinance No. 2011-962)* that the "Yorba Linda Town Center draws its architectural identity from its history. A small concentration of commercial buildings located along Main Street strongly conveys the city's early commercial and social center."

We recommend that the future of the subject building include plans for it's continued for retail or office use, which would allow for the existing historic characteristics of the building to be preserved for future generations. To retain the building, through preservation and rehabilitation would support the City's goal that "Main Street will remain as the heart of Yorba Linda with its charming, pedestrian scaled buildings and streets."⁵

Options:

- A. Complete Demolition: If the building at 4815 Main Street were to be demolished – it would be considered a substantial adverse effect to a historical property under CEQA, and would require an Environmental Impact Report (EIR) be prepared for the proposed project. A substantial adverse effect cannot be mitigated to a project impact level of "less than significant." Mitigation measures would still be required to document and record the property, besides the need to create an interpretive/educational deliverable that would be available to the public. The replacement building would need to not just fill the "empty envelope" with one of acceptable size, but would need to present aspects of the original historic character of the street through sensitive design.
- B. Retention of the front/street façade in its entirety: This option would retain the original and historic, front façade, and allow the demolition of the remainder of the building. The front façade includes the bulkheads, retail window fenestration, front entrance way, and the Western

² California Division of the State Architect. "California Historic Building Code": <https://www.dgs.ca.gov/DSA/Resources/Page-Content/Resources-List-Folder/CHBC>

³ California Historic Building Code. "Historical Preface" from *2013 Historical Building Code*, Part 8: <https://codes.iccsafe.org/content/CAHBC2013/historical-preface>

⁴ California Office of Historic Preservation. "State Historical Building Code": https://ohp.parks.ca.gov/?page_id=21410

⁵ *Yorba Linda Town Center Specific Plan (Ordinance No. 2011-962)*, page 3-29.

false-front design and materials (including cornice and brackets. If the front façade was retained and protected under the Preservation Guidelines of the *Secretary of the Interiors' Treatment for Historic Properties*, the project may be found not to be a substantial adverse effect under CEQA. A full-set of "as-built" drawings of the historic building would record the original building design and materials, and the drawings would be deposited in a local archival repository (i.e. Local History Room of the Main Library.) A new structure of the same height as the original main block would be constructed onto the front façade. The new structure could run the length and width of the legal parcel.

- C. Retain the original portion of the building, and remove the later addition on the rear elevation. A new addition could be constructed that would run the length and width of the legal parcel. The project would be performed under the Rehabilitation Guidelines of the *Secretary of the Interiors' Treatment for Historic Properties*. The Guidelines for Rehabilitation allow for the replacement of extensively deteriorated, damaged, or missing features using either traditional or substitute materials. (It also allows for the retrofitting of seismic upgrades in historic properties.) The Rehabilitation Guidelines include opportunities to make possible an efficient contemporary use through alterations and additions, and would not be a substantial adverse effect under CEQA.

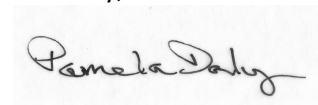
If Option B or C is chosen, the proposed project may be eligible for financial support through the Federal Tax Credit Program (<https://www.nps.gov/subjects/taxincentives/index.htm>), the California Tax Credit - Commercial Program (https://ohp.parks.ca.gov/?page_id=31647). (Unfortunately, the City has not yet adopted the Mills Act Program.)

Summary:

Our investigation revealed that the proposed project to demolish the existing building will have a substantial adverse effect to a contributing building of the Main Street Historic District. The building at 4815 Main Street appears eligible to be considered eligible to the National Register and/or California Register as a rare example of an early commercial building in the City. The subject building has retained the original significant character-defining aspects of the building's design, materials, workmanship, feeling, and association. We recommend that the proposed project retain sufficient historic design and material as presented in Options A and B, and be rehabilitated and preserved per the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

Please do not hesitate to contact me if you have any follow-up questions, or need additional information.

Sincerely,

A handwritten signature in black ink that reads "Pamela Daly". The signature is written in a cursive, flowing style.

Pamela Daly, M.S.H.P.

Principal

Attachment: Biography for Pamela Daly



**951 Beacon Drive, Eugene, Oregon 97404
(951) 369-1366**

ARCHITECTURAL HISTORIAN and HISTORIAN HISTORIC PRESERVATION SERVICES

Pamela Daly is a 36 CFR 61 qualified Architectural Historian and historic preservation professional, with over 31 years of experience, engaged in providing consulting services from her firm of Daly & Associates. Those services include the evaluation of historic resources per Federal, State and local criteria, and she has extensive training to provide technical assistance in the form of historic structure assessment and conservation reports. Ms. Daly holds a Master of Science Degree in Historic Preservation from the University of Vermont and a Bachelor of Science Degree in Business Management (with a minor in History).

Ms. Daly has owned Daly & Associates, a historic preservation consulting firm since 1998, and provides historic preservation services to both the private and public sector. She is accepted as a principal investigator for both Architectural History and History by the California State Office of Historic Preservation, and holds the qualifications to work throughout the United States. Ms. Daly has been the principal investigator and author of historic resource reports for over 180 projects prepared under federal and state regulations. Her experience includes the preparation of Historic Resource Assessment Reports, CEQA Technical Reports, HABS/HAER/HALS documentations, preservation plans for the rehabilitation and/or restoration of historic properties, nominations to the National Register of Historic Places, public presentations of preservation issues, conservation plans for historic resources, and preservation planning guidelines.

Daly & Associates has expertise in assessing and evaluating residential/agricultural/industrial architectural styles dating from the eighteenth to the twenty-first century, and in the survey and evaluation of military sites and structures in both the western and eastern United States. Daly & Associates has worked on a variety of projects ranging including the authoring of a National Register nomination of a historic district in Vermont consisting of over 100 buildings and structures dating from 1790 to 1974 – to a small town baseball park built by the Civilian Conservation Corp during the Great Depression. Ms. Daly has performed studies on historic gold mines, airplane hangars, water conveyance and storage systems, helicopter hangers, ammunition bunkers, flight simulators, and Cold War radar arrays.

Daly & Associates has managed multiple cultural resource projects which included extensive investigation and research, development of budgets, operating reports, and consultation with clients such as the United States Air Force, Navy, Army Reserves, U.S. Army Corps of Engineers, Bureau of Land Management, U.S. Forest Service, National Park Service, Federal Transportation Agency, Caltrans, and U.S. Fish & Wildlife.

Certifications

California Historical Resources Information System registered #64.

Metropolitan Water District of Southern California – Pamela Daly dba Daly & Associates holds Small Business Certification #170016.

Oregon Secretary of State Business Registry: 19243004-95.

DUNS Number: 802022231.

Insurance

Commercial General Liability; each occurrence \$2,000,000; general aggregate \$4,000,000

Automobile; combined single limit \$1,000,000

Professional Liability/Errors & Omissions; each claim \$1,000,000