

## MEMORANDUM

DATE	February 26, 2026	PROJECT #	25305
TO	Kevin Purvis	PROJECT	Historic Resource Assessment for 220 S. Orange Street, Orange, CA
OF	220 S Orange Street, Orange, CA	FROM	Amanda Commins, Page & Turnbull Flora Chou, Page & Turnbull
CC	Doug Ely, Architect, DSEA	VIA	Email

REGARDING **220 S. Orange Street Proposed Project Analysis: Demo & New Garage | Revised**

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### Introduction

This Proposed Project Analysis Memorandum has been prepared by Page & Turnbull at the request of property owner Kevin Purvis, for submission to the City of Orange, in anticipation of a proposed project at 220 S. Orange Street, Orange (APN 390-391-08) (**Figure 1**). It was revised to address comments from the City, specifically Comment Number 001 through 005 in Table B, in the January 10, 2026 letter from Alyssa Jurkevics, Planning Technician, Planning Division.

The property contains a wood-frame single-family residence built in 1911 in the Craftsman style, a detached wood-frame garage, which appears to have been built in the same period, and a detached wood-frame ancillary building. The subject property is contributing to both the Old Towne Orange National Register Historic District, established in 1996, and the Old Towne Orange Local Historic District, established in 1991 (**Figure 2 and Figure 3**).

The project proposes to demolish the existing undersized garage and ancillary building and construct a new two-bay garage compliant with minimum garage size requirements per the City of Orange Municipal Code. The purpose of this memorandum is to determine if the existing garage and ancillary buildings are character-defining features of the contributing property and then review the proposed project for compliance with the City of Orange *Historic Preservation Design Standards* and the *Secretary of the Interior's (SOI) Standards for Rehabilitation*.<sup>1</sup> No work at the main residence that is the contributing building is proposed.

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<sup>1</sup> City of Orange, *Historic Preservation Design Standards*, December 12, 2018; Secretary of the Interior's Standards for Rehabilitation, National Park Service U.S. Department of the Interior.

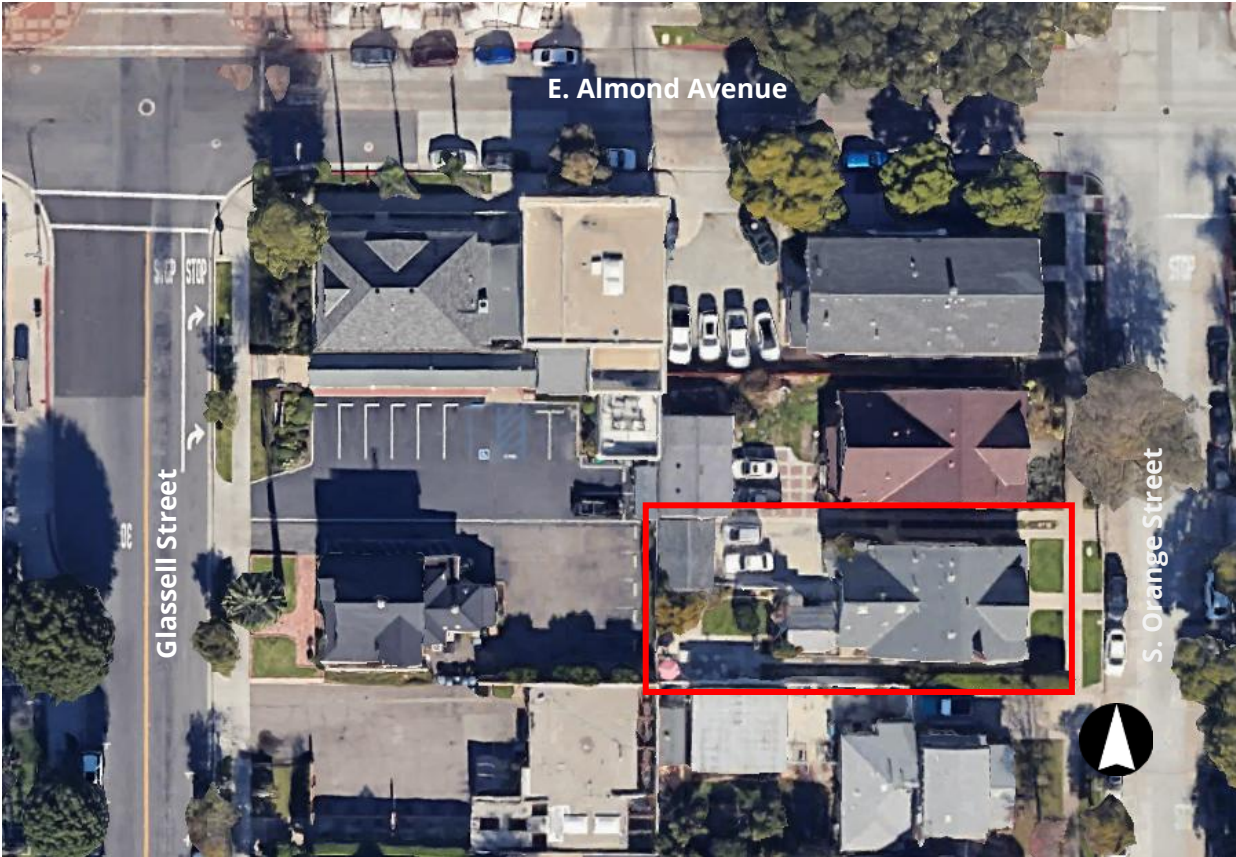


Figure 1. Subject parcel at 220 S. Orange Street indicated by red outline.  
Source: Google Maps, 2025. Edited by Page & Turnbull.

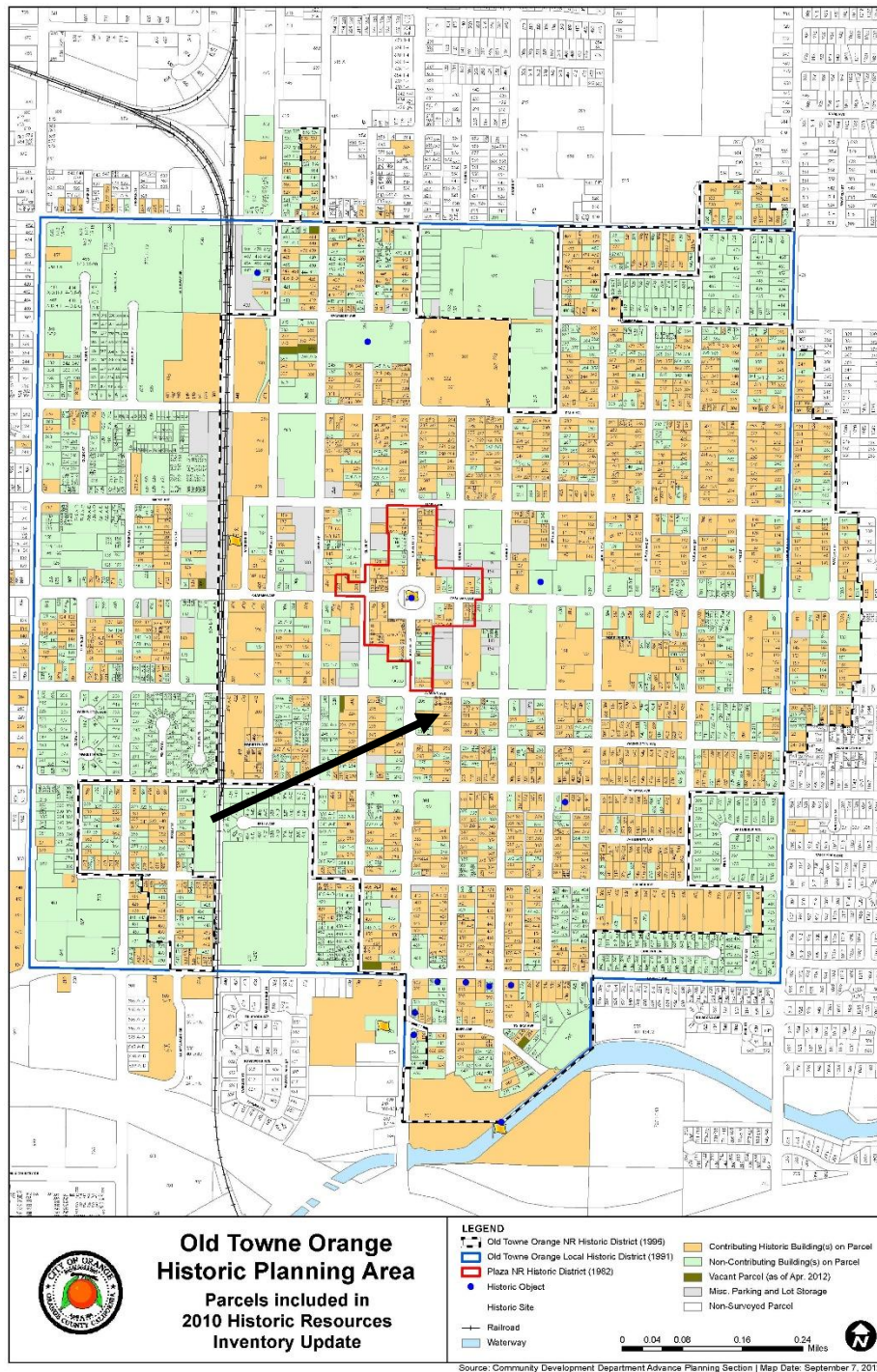


Figure 2. Map showing the full boundary of the Old Towne Orange Historic Planning Area. The property at 220 S. Orange Street is indicated with a black arrow. Non-contributing properties are shaded green, contributing properties are shaded orange. Source: City of Orange, Community Development Department. Edited by Page & Turnbull.

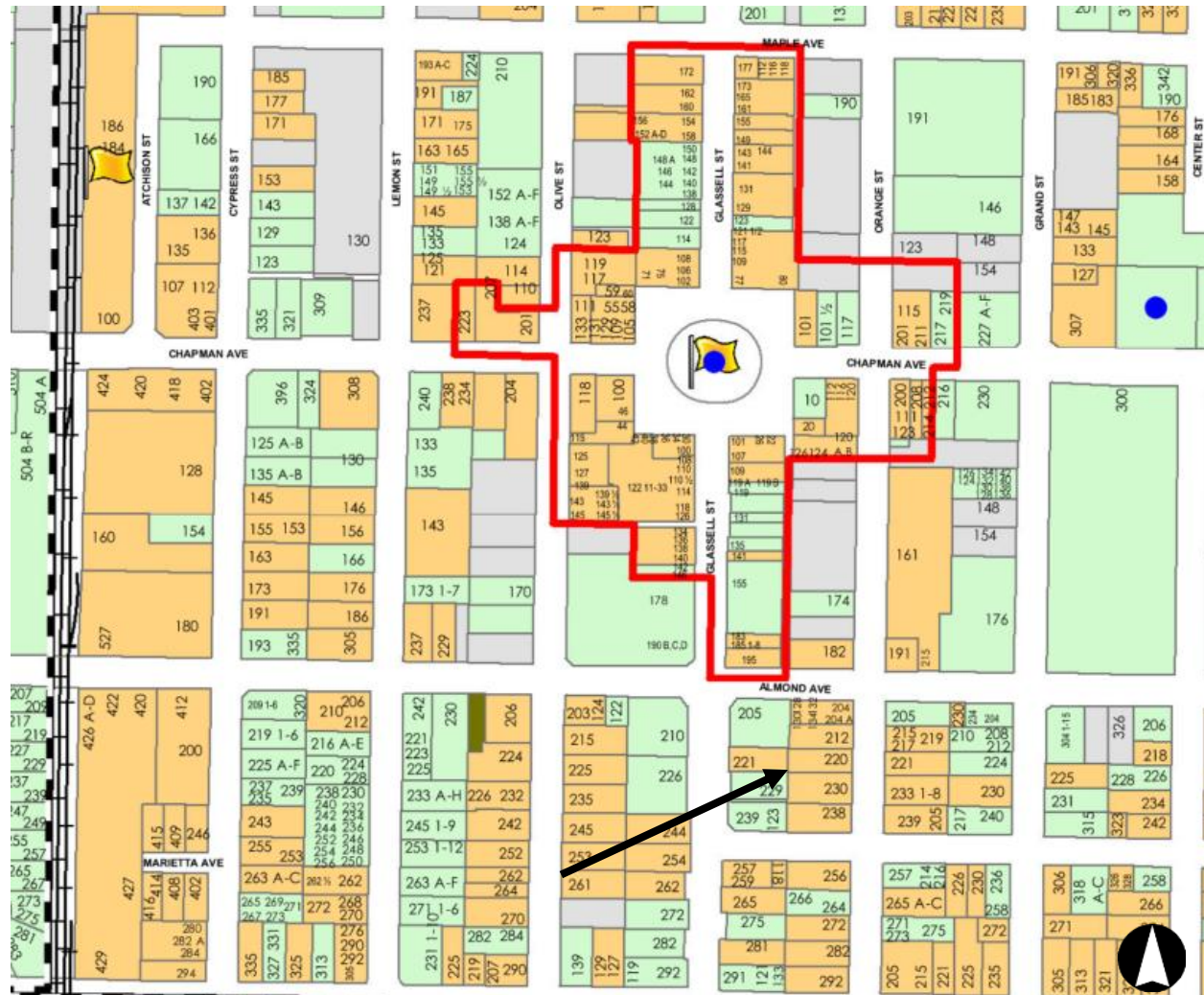


Figure 3: Detail showing the location of the contributing 220 S. Orange Street property in the Old Towne Orange Historic Planning Area map, indicated with a black arrow. Non-contributing properties are shaded green, contributing properties are shaded orange. Source: City of Orange, Community Development Department. Edited by Page & Turnbull.

### METHODOLOGY

Page & Turnbull conducted a site visit on August 25, 2025, to document existing conditions of the property and surrounding neighborhood. The interior of the ancillary building was not available for view. Observations made during the site visit guide the analysis of the proposed project’s compliance with the City of Orange *Historic Preservation Design Standards*, specifically the Standards for Historic Residential Buildings – Garage and Accessory Structures, and relevant standards from the Secretary of the Interior’s Standards for Rehabilitation. Page & Turnbull reviewed the proposed project plan set for 220 S. Orange Street prepared by DSEA, Inc. that was provided by architect Doug

Ely to Page & Turnbull via email on November 10, 2025, and a revised set dated February 13, 2026, as well as and a State of California Department of Parks and Recreation (DPR) 523 form prepared for this property by Chattel Architecture in March 2005. Property owner Kevin Purvis provided photographs of the existing garage and the neighboring garage prior to the neighboring garage's demolition in the 1990s. Additional building-specific research was conducted as needed, including a review of Sanborn Map Company fire insurance maps, historic aerial photographs available through the University of Santa Barbara Library FrameFinder and the Orange County Public Work's Historical Aerial Imagery website, and permit records available through the City of Orange. DSEA, Inc. provided additional photographs of the existing garage's extant materials in early February 2026.

### Preparer Qualifications

Page & Turnbull was established in 1973 as Charles Hall Page & Associates to provide architectural and conservation services for historic buildings, resources, and civic areas. The company was one of the first architecture firms in California to dedicate its practice to historic preservation and is among the longest practicing such firms in the country. Offices are located in San Francisco, Los Angeles, Sacramento, and San Jose. Staff includes licensed architects, designers, architectural historians, conservators, and planners.

This proposed project analysis memorandum was prepared by Page & Turnbull of Los Angeles, California. Page & Turnbull staff responsible for this report include Christina Dikas Brobst, Principal-in-Charge, Stacy Kozakavich Project Manager; Flora Chou, Associate Principal and substitute Project Manager, and Amanda Commins, Cultural Resources Planner, primary author, all of whom meet or exceed the Secretary of the Interior's Professional Qualification Standards for Historic Architecture, Architectural History, or History.

### Existing Historic Status

220 S. Orange Street is a contributing building within both the Old Towne Orange Local Historic District, established in 1991, and the Old Towne Orange National Register Historic District, established in 1996. Chattel Architecture staff evaluated the existing Craftsman style residence at 220 S. Orange Street using a DPR 523 form in April 2005 (**Exhibit A**). Chattel found the property eligible for listing in the National Register of Historic Places as a contributing resource to the historic district. The California Historical Resource Status Code (CHRSC) of "1D" was assigned to the property in the DPR 523 forms, meaning "Contributor to a multi-component resource like a district listed in the NR by the Keeper. Listed in the CR."<sup>2</sup>

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<sup>2</sup> California State Office of Historic Preservation Department of Parks and Recreation, *Technical Assistance Bulletin #8: User's Guide to the California Historical Resource Status Codes & Historical Resource Inventory Directory*, Sacramento, November 2004 (Status Codes updated March 1, 2020).

## Property Description

The property at 220 S. Orange Street is a rectangular 6,600-square-foot parcel located on the west side of the street between E. Almond Avenue and E. Washington Avenue. It contains a one-and-a-half story, 2,009-square-foot Craftsman style residence with a rectangular footprint, a detached garage, and a detached ancillary building. The backyard features a concrete-paved patio and a lawn planted with fruit trees and low shrubbery. A driveway runs along the north side of the parcel to the garage. Wood fencing and shrubs enclose the west and south sides of the property.

The one-and-a-half story house has a side gable roof with deep overhanging eaves, exposed rafter tails, brackets, and asphalt shingle roofing. The residence features wood clapboard cladding and a partial width engaged porch with battered wood columns and brick piers. The wood windows include double-hung with ogee lugs, casement, and fixed with wood surrounds. An exterior brick chimney is located on the south façade. The residence's primary (east) façade faces S. Orange Street and is symmetrically organized with a central entry accessed by three concrete steps (**Figure 4**). A large, gable dormer centered on the east slope of the roof features bargeboard with a decorative geometric pattern.



Figure 4: Primary (east) façade, view west.

## BACKYARD

The backyard occupies the southwest corner of the property, enclosed by a wood fence between the garage and ancillary building. A concrete patio extends along the western boundary, while the remaining edges are framed by concrete coping that borders a small, central lawn. The yard is informally landscaped with a citrus tree at the center, a larger tree, and scattered low shrubs along the perimeter (**Figure 5**).



Figure 5. Backyard, view west.

## GARAGE

The existing detached garage is located at the northwest corner of the parcel and is accessed by a shared driveway along the north property line. The one-story building has a rectangular footprint and a side gable roof clad in asphalt shingles. The garage is modest in design, and lacks Craftsman-style features or details of any other style. In contrast to the main residence's horizontal siding, the garage's exterior walls are clad in vertical wood siding of different types and dimensions. The primary (east) façade faces the driveway and contains two bays (**Figure 6**). The north bay has a pair of vertical wood board doors surrounded by wood trim. The south bay also has a pair of vertical wood board doors, with different dimensions than the north doors, in an opening that is smaller than the north bay and does not have wood trim around the door opening. One door leaf has been modified to add a single entry door. Exterior wall cladding at the north façade, visible above and around the south bay opening, appears to be wide vertical boards that are flush to each other (**Figure 7**).



Figure 6. East façade of the garage, view southwest.



Figure 7. Detail view of primary (east) façade of garage with flush vertical boards as the siding around the garage opening, view west.



Figure 8. North façade of garage (left) that was constructed in 1996 after the neighboring garage was demolished, view west. The replacement neighboring garage is at right.

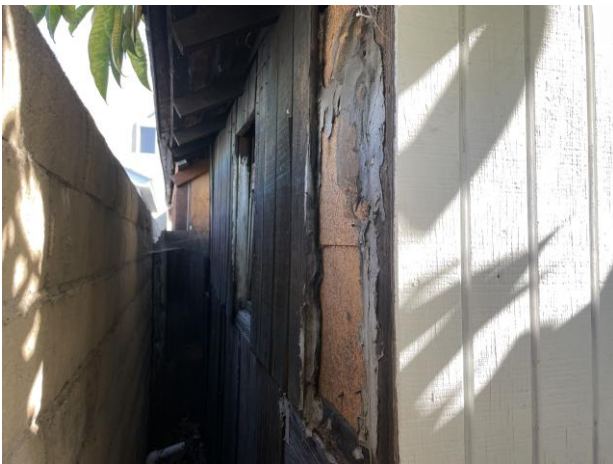


Figure 9. Rear (west) façade (left) and south façade (foreground) of the garage showing different cladding, view north. Note the expansion to enclose the eave at the north bay visible in the background.



Figure 10. The north end of the garage's rear (west) façade of the garage, which is enclosed under the roof eave, view northeast. Source: DSEA, Inc., January 2026.

The north exterior wall of the garage was constructed in 1996 to enclose the building, once the adjacent garage at the neighboring property was demolished. The north wall is clad in flush vertical wood boards (identified as T-111 grooved siding sheets) and the façade has no openings (**Figure 8**). The south façade is concealed behind plantings and partially visible. It appears to be clad in vertical wood siding, where the vertical members are more narrow than those found at the other façades and have channels between the vertical members (**Figure 9**).

The rear (west) façade is also partially visible, as it is close to the concrete block wall at the rear property line. It appears to be divided into two bays as well. The south bay features wide vertical boards cladding that are flush to each other and one window opening with the sash removed (**Figure 9**). Exposed rafter tails at the slightly overhanging roof are visible here, but not seen elsewhere on the building. At the north bay, the original exterior wall appears to have been removed to expand the building under the roof eave, at an unknown date. Newer framing members, infilled with wide wood boards, comprise the exterior wall at the north bay (**Figure 10**).



Figure 11. Interior of the south garage bay, view west.



Figure 12. Interior of the north garage bay, view west. Non-original wood cladding seen at the west (center) and north walls (right)

The interior of the south bay has been modified with finished walls and ceiling panels (**Figure 11**). The north bay interior retains exposed framing and roof decking, where the non-original rear (west) and north walls are visible (**Figure 12**).

## ANCILLARY BUILDING

The detached ancillary building, which is adjacent to the rear façade of the main residence, is an utilitarian structure with an L-shaped footprint and an asphalt gable roof with exposed rafter tails (**Figure 13**). The exterior cladding is a mix of wood clapboard, vertical wood boards, and stucco. A single entry door is located on the east façade (**Figure 14**). Fenestration includes a set of three wood windows on the north façade and a fixed gable-end window on the west façade (**Figure 15**). Plywood secure areas that once had window openings on the east, south, and north façades. The interior was not available during the site visit.



Figure 13. North façade of ancillary building, view south.



Figure 14. East façade (foreground) and south façade (left) of ancillary building, view northwest



Figure 15. West façade of ancillary building, view northeast.

## SURROUNDING NEIGHBORHOOD

The surrounding neighborhood is residential in character and is predominantly developed with one- and two-story single-family residences with regular setbacks from the sidewalk. The parcels immediately surrounding the subject property are Craftsman residences, which are contributors to the historic district, and that feature shallow front lawns, modest landscaping, and altered garages (**Figure 16** and **Figure 17**).



Figure 16. 212 S. Orange Street, built 1911, directly north of the subject property.



Figure 17. 230 S. Orange Street, built 1913, directly south of the subject property.

## Construction Chronology & Prior Alterations

Permit records on file with the City of Orange for 220 S. Orange Street do not include new construction permits for the garage or ancillary building, though some records are not legible. The DPR form for the property lists the main residence's construction date as 1911, and it is assumed the existing garage is from the same date. The main residence and garage appear on the 1922 Sanborn map, though no ancillary building is seen (**Figure 18**). The same condition remains in the 1950 Sanborn map (**Figure 19**).

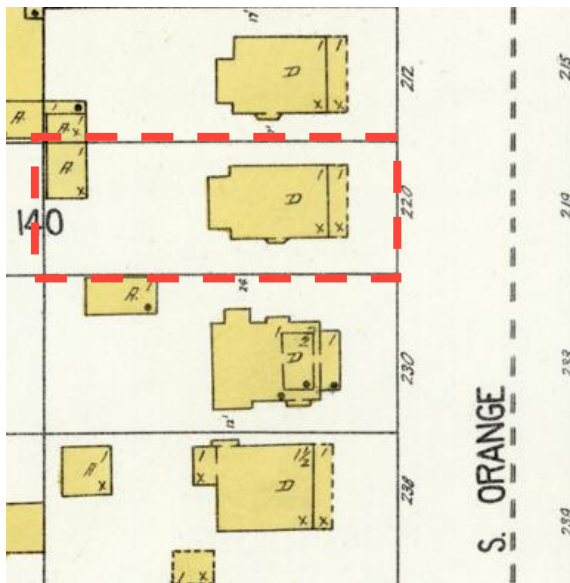


Figure 18. Sanborn Company map dated 1922, with location of 220 E. Orange Street, identified by a dashed red outline. Source: Los Angeles Public Library. Edited by Page & Turnbull.

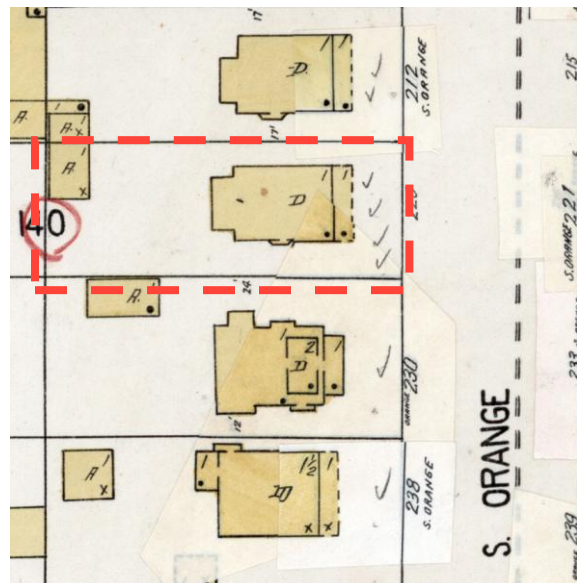


Figure 19. Sanborn Company map dated 1950, with location of 220 E. Orange Street, identified by a dashed red outline. Source: Los Angeles Public Library. Edited by Page & Turnbull..

Observed alterations to the primary residence include enclosure of the front porch, adding an exterior staircase on the north façade and a small, rear one-story addition. In historic aerial photographs up to 1947, a tree is seen at the rear of the main residence, where the ancillary building is currently located (**Figure 20**). The detached ancillary building first appears on a 1953 aerial photograph behind the residence in its existing location (**Figure 19**).



Figure 20. Aerial photograph dated 1947, with location of 220 E. Orange Street, identified by a dashed red outline. A tree is in the location of the ancillary building indicated by yellow arrow. Source: Santa Ana 600 Scale, 1947, County of Orange, Historical Aerial Imagery. Edited by Page & Turnbull.



Figure 21. Aerial photograph dated 1953, with location of 220 E. Orange Street, identified by a dashed red outline. Location of ancillary building indicated by yellow arrow. Source: Flight C\_18785, Frame 1-99, UC Santa Barbara Air Photo Collection. Edited by Page & Turnbull.

As seen on the Sanborn maps, the original design of the property included a shared driveway with an auto garage on the subject property next to a smaller garage on the neighboring property at the shared property line. The two garages shared a wall at the property line, and visually appeared to be one building (**Figure 22**). The smaller (one bay) garage on the neighboring property at 212 S. Orange Street was demolished in 1996, according to City of Orange building permits (**Figure 23**). A new garage was subsequently constructed on the neighboring property with a larger footprint and massing. As a result of the 1996 demolition, new exterior cladding was added to enclose the wall that had been previously shared with the neighbor's garage and to create the new north façade of the remaining two-bay garage at 220 S. Orange. Part of the roof of the neighboring garage was also retained and became the overhanging eave at the new north façade.

Additional site investigation by DSEA, Inc. indicate the south bay of the existing garage was likely constructed later than the north bay, and with no concrete slab. Instead, wood flooring was installed directly on top of dirt. Other visible alterations at the existing garage include a new exterior wall at the north end of the rear (west) façade that enclosed some of the space below the roof eave, completed at an unknown date. The south façade has vertical wood siding with channels that do not match the flush vertical wood boards found at the other façades, and is assumed to be an alteration

completed at an unknown date. Furring at the north bay's garage door opening also indicate the opening has been widened, and the north bay garage doors are not original.



Figure 22. Image showing configuration of the existing two-bay garage at the subject property (220 S. Orange) at left and the smaller, one-bay garage at the neighboring property (212 S. Orange) at right, prior to the 1996 demolition of the neighboring garage. Source: Kevin Purvis, subject property owner. Edited by Page & Turnbull.



Figure 23. Image showing remaining two-bay garage at 220 S. Orange (left) with exposed framing, circa 1996. Source: Kevin Purvis, subject property owner. Edited by Page & Turnbull.

## Garage as a Character-Defining Feature

Historic documentation indicates that the extant garage was constructed during the Historic District's period of significance (1888-1940), likely at the same time as the main residence in 1911. It is seen on the 1922 Sanborn map in the same location and with approximately the same footprint as it currently remains. While it appears to retain some physical features from the district's period of significance, it also has undergone alterations that have affected its integrity, as discussed below.

### INTEGRITY ANALYSIS FOR GARAGE

#### LOCATION

The garage retains integrity of location. The structure remains at the northwest corner of the 220 S. Orange parcel in its historic position, oriented toward the shared driveway along the north property line.

#### SETTING

The garage retains integrity of setting. The spatial relationship between it and the main residence, driveway, and rear yard remains consistent with the historic pattern of development seen on Sanborn maps. The surrounding residential neighborhood within the Old Towne Orange Historic District generally remains intact in character, scale, and use, though the lot directly west of the subject property is no longer a single-family residence. It is now a surface parking lot.

#### DESIGN

The garage does not retain integrity of design. The original configuration included a shared wall with the neighboring garage that was altered in 1996 when the portion on the adjacent parcel was demolished (**Figure 22**). The portion that remains at the subject property no longer reflects the overall original massing or configuration. The existing garage never had a north exterior wall with an overhanging eave during the district's period of significance (**Figure 8** and **Figure 23**). The exterior wall at the north half of the rear (west) façade appears to have been removed and a new exterior wall constructed to slightly expand the interior space (**Figure 10**). The building may have had exposed rafter tails, as seen at the south half of the rear (west) façade (**Figure 9**), but rafter tails are no longer exposed at the primary (east) façade nor at the north half of the rear (west) façade.

In addition, the two vehicular openings and pair doors on the primary (east) façade do not match in size, proportion, or detailing. The opening at the south bay is smaller than the north bay, allowing some of the façade's flush vertical wood broad siding to be visible (**Figure 6** and **Figure 7**). However, the wood boards on the south garage doors do not align with the siding. No permits, historic photographs, or other documentation has been found to indicate which bay is the original design nor when or what changes occurred.

Overall, the garage does not appear as it would have during the district's period of significance due to the demolition of the garage on the neighboring property. Additionally, undated alterations at the primary (east) and rear (west) façades further erode the garage's design to the point where it does not appear to retain integrity as a garage dating to 1911, when it was likely originally constructed.

#### MATERIALS

The garage does not retain integrity of materials. Roofing materials have been replaced, and the north exterior wall dates to 1996. The north half of the rear (west) façade is also a newer wall (**Figure 10**). In addition, the primary (east) façade appears to retain only a small area of original flush vertical wood boards, with much of the façade comprised of the two garage doors. It is assumed that at least one pair of the doors is not original, as the two doors do not match in size, proportion, or detailing.

The only other section of original exterior flush vertical wood boards that remains is at the south half of the rear (west) façade (**Figure 9**). The south façade has vertical wood siding with narrow vertical members and channels, which does not match siding at any other façade. With the exception of the 1996 north exterior wall, no records have been found to indicate when materials at the primary (east), rear (west), or south façades were changed. However, the cumulative effect is that the garage retains very little exterior materials from its original construction, and as such, it has lost integrity of materials.

#### WORKMANSHIP

The garage also does not retain integrity of workmanship. The simple, utilitarian building has few decorative features that reflect the craft of the original workers. With the extent of the material alterations, little evidence of the original workmanship remains.

#### FEELING

The garage's feeling as a 1911 residential garage has been eroded with the alterations that have occurred. The building does not have features that visually connect it to the main residence's Craftsman design to convey the feeling that they were constructed at the same time. Additionally, while the building looks aged, it does not strongly or cohesively convey the character of an early twentieth-century residential garage within the district. As such, the garage does not have integrity of feeling.

#### ASSOCIATION

The garage does retain minimal association as a garage, with the paired garage doors at the primary (east) façade.

Overall, the garage retains integrity of location, setting, and association, but has lost integrity of design, materials, workmanship, and feeling as a 1911 garage for the subject property. As such, it does not appear to retain the physical features that would allow it to qualify as a character-defining feature of the contributing property.

### **Ancillary Building as a Character-Defining Feature**

The detached ancillary building does not appear on the 1922 or 1950 Sanborn fire insurance maps, nor on historic aerial photographs from before 1940, the end of the Old Towne Historic District's period of significance. It first appears in a 1953 aerial photograph. As such, it was constructed outside the district's period of significance and therefore is not considered a character-defining feature of the property.

In addition, the ancillary building is utilitarian in design with no style expressed. It has some features that are similar to those found on the main residence, such as exposed rafter tails and horizontal wood clapboard, but the building overall lacks decorative features that would categorize it as Craftsman in style or as strongly associated with the main residence. It also has vertical wood planks at some exterior walls and plywood over where window openings may have existed. These indicate alterations since the building's construction that have changed the original design and materials.

Overall, the ancillary building fails to meet the threshold to be considered a character-defining feature of the property and the historic district because it was 1) not constructed during the Old Towne Historic District's period of significance (1880-1940), and 2) it retains limited physical features from when it was constructed.

## Proposed Project Description

The following proposed description is based on the scope of work described and illustrated in the drawing set for “Purvis Residence, Garage Replacement and Ancillary Building Removal, 220 S. Orange St, Orange 92886” prepared by DSEA, Inc. and printed February 13, 2026.

The project proposes to demolish the existing 338 square-foot garage and 171 square-foot ancillary building, neither of which are considered to be character-defining features to the contributing property as discussed previously in this report. A new two-bay garage would be constructed in the same location as the existing garage, which is too small to accommodate typical modern vehicles. The proposed new garage would be approximately 412 square feet and would maintain a similar orientation, massing, and roof form as the original garage (**Figure 24**). Landscaping would be installed where the ancillary building is currently located.

The new garage would feature a simple gable roof with Class “A” composite asphalt shingles to match the main residence, and be no more than 10 feet high to the top of the ridge, about two feet lower than the existing garage. Its exterior walls would have 5-inch horizontal wood lap siding, and painted wood trim consistent with the horizontal siding at the main residence. Two 8-foot-wide roll-up sectional wood garage doors are proposed on the east façade, facing the existing driveway, maintaining the historic access pattern from S. Orange Street. The side, south façade would include a wood pedestrian door and pair of hung windows. The design would incorporate modest overhanging eaves, exposed fascia, and simple wood detailing to complement the historic materials and proportions of the main residence. The full drawing set for the project is included in **Exhibit B**.

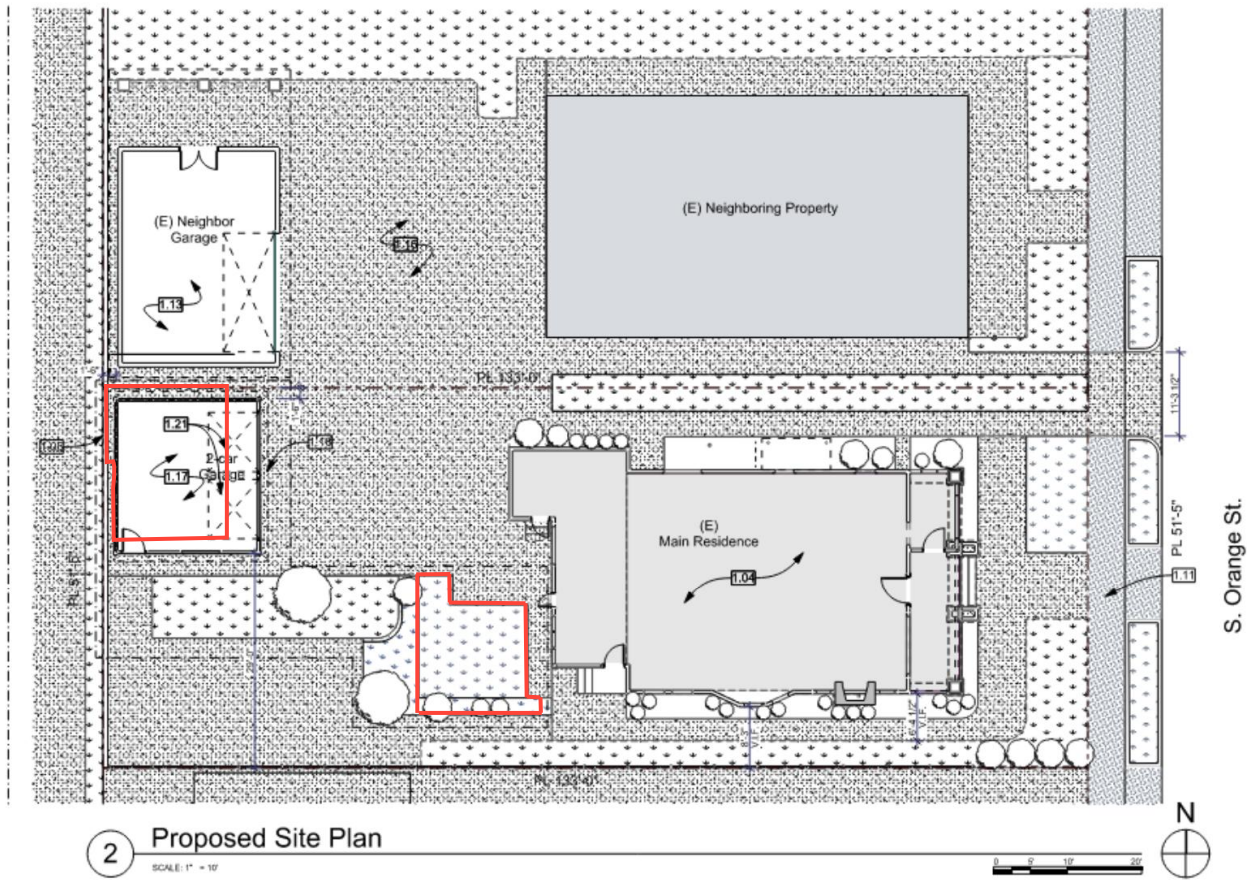


Figure 24. Proposed Site Plan. The approximate footprints of the existing non-historic ancillary building and altered garage are outlined in red. Source: DSEA, Inc., "Purvis Residence, Garage Replacement and Ancillary Building Removal, 220. S Orange Street, Orange, CA 92866," Sheet A-1.0 (February 13, 2026). Edited by Page & Turnbull.

## Proposed Project Compliance Analysis

Since the subject property is a contributor to the Old Towne Historic District and the proposed project involves demolition of the existing garage and ancillary building and construction of a new garage, this memorandum reviews the proposed new garage for conformance with the City of Orange Historic Preservation Design Standards (HPDS) and the Secretary of the Interior’s (SOI) Standards for Rehabilitation.<sup>3</sup>

### CITY OF ORANGE HISTORIC PRESERVATION DESIGN STANDARDS

The relevant sections of the City of Orange Historic Preservation Design Standards include the Standards for Historic Residential Buildings – Garages and Accessory Structures, as summarized in the tables below. A discussion of the proposed project’s conformance is provided for the relevant standards.

As the above discussion concluded that neither the existing garage nor ancillary building are character-defining features to the contributing property, standards 1 through 3 do not apply. As such, the proposed new garage is evaluated only against standard 4.

TABLE 1: CONFORMANCE WITH STANDARDS FOR HISTORIC RESIDENTIAL BUILDINGS

Garages & Accessory Structures <sup>4</sup>	Project Conforms?	Discussion
<b>4:</b> New garages and accessory structures should be similar in size, scale, and design to historic garages and accessory structures in the historic districts.	Yes	The new garage would be similar in size, scale, and design to the existing garage. It would be smaller in size and scale to the non-original neighboring garage at 212 S. Orange Street.
<b>4a. A garage attached to a historic house is generally inappropriate. New garage and accessory structures typically should be located behind the rear wall of the historic house.</b>	Yes	The new stand-alone garage would not be attached to the historic house. It would be in the approximate location as the existing garage, which is located behind the rear wall of the historic house at the property’s northwest corner.
<b>4b:</b> New garages or accessory structures should not compete visually with the historic residence and should	Yes	At 10 feet high at the gable roof peak, the new garage would be two feet lower in height than the

<sup>3</sup> City of Orange, *Historic Preservation Design Standards*, December 12, 2018; Secretary of the Interior’s Standards for Rehabilitation, National Park Service U.S. Department of the Interior.

<sup>4</sup> “Standards for Historic Building Features,” *Historic Preservation Design Standards*, (City of Orange, December 12, 2018), 31-34.

<p>be subordinate in height, width, and area in comparison to the existing primary structure.</p>		<p>existing garage. Its approximately 20-foot width and 412 square-foot area is subordinate to the main residence's almost 24-foot height at the roof peak, approximately 30-foot width, and overall 2,100 square-foot area.</p>
<p><b>4c:</b> Accessory structures may reflect the architectural style of the existing house through similar materials, windows, roof patterns, and simplified architectural details.</p>	<p>Yes</p>	<p>The new garage is simple in design but takes its cues from the main residence in its gable roof form and overhanging eaves. Its exterior materials—horizontal wood siding and wood doors and windows—are similar to those found on the main residence. The proposed new garage doors have a design that is reminiscent of Craftsman style yet simplified to reflect the style of the main residence.</p>
<p><b>4d:</b> Basic rectangular forms, with simple hip or gable roofs, are appropriate for most new garages and accessory structures.</p>	<p>Yes</p>	<p>The new garage would have the same basic rectangular form and gable roof profile as is typical for the historic garages found in the historic district.</p>
<p><b>4e:</b> Single-bay garage doors are more appropriate than double-bay garage doors on new structures.</p>	<p>Yes</p>	<p>The new garage would have two single-bay garage doors rather one double-bay door. The design also gives the impression of paired doors that is similar to historic garages found in the historic district</p>

Overall, the proposed project adheres to all of the relevant guidelines for new garages and accessory structures in the Standards for Historic Residential Buildings of the City of Orange Historic Preservation Design Standards.

## SECRETARY OF THE INTERIOR’S STANDARDS FOR REHABILITATION

The City of Orange Historic Preservation Design Standards are based on the Secretary of the Interior’s Standards for Rehabilitation (SOI Standards). This section reviews the proposed project for conformance with the SOI Standards, as summarized in the table below. A discussion is provided for relevant standards.

TABLE 4: CONFORMANCE WITH SECRETARY OF THE INTERIOR’S STANDARDS FOR REHABILITATION

Secretary of the Interior’s Standards for Rehabilitation <sup>5</sup>	Project Conforms?	Discussion
<b>1:</b> A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.	Yes	The proposed project would continue the residential use of the property.
<b>2:</b> The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.	Yes	The existing garage does not retain sufficient integrity to be a character-defining feature of the property, as discussed previously in this report. The ancillary building was constructed after the historic district’s period of significance, and is also not considered a character-defining feature of the property. As such, their demolition would not be considered removal of historic materials or features that characterize the property. There are no changes proposed to the historic main residence and the overall historic character of the property will be maintained.
<b>3:</b> Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.	Yes	No conjectural features or architectural elements from other buildings would be added to the residence. The proposed new garage does not incorporate extensive Craftsman-style or other historic architectural style detailing that would create a false sense of historical development.

<sup>5</sup> Secretary of the Interior’s Standards for Rehabilitation, National Park Service U.S. Department of the Interior.

Secretary of the Interior's Standards for Rehabilitation <sup>5</sup>	Project Conforms?	Discussion
<p><b>4:</b> Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.</p>	<p>Yes</p>	<p>The property has been altered over time, including partially enclosing the front porch, the rear addition, and exterior staircase at the main building, and adding the detached ancillary building, but none of these alterations have acquired historic significance in their own right. Demolishing the ancillary building would not be removing an alteration that has gained significance.</p>
<p><b>5:</b> Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.</p>	<p>Yes</p>	<p>The main residence's distinctive features, including the gable roof, large gable dormer, wood clapboard siding, and wood windows, would be preserved in the proposed project. As previously discussed, the existing garage and ancillary building are not character-defining features. As such, their demolition would not remove distinctive features, finishes, construction techniques, or examples of craftsmanship from the property.</p>
<p><b>6:</b> Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.</p>	<p>N/A</p>	<p>The proposed project does not include any work on historic features or materials. As such, Standard 6 is not applicable to this project.</p>
<p><b>7:</b> Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.</p>	<p>N/A</p>	<p>The proposed project does not include any physical or chemical treatments to historic materials or finishes. As such, Standard 7 is not applicable to this project.</p>
<p><b>8:</b> Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.</p>	<p>N/A</p>	<p>No extensive excavation appears to be required to construct the new garage. As such, Standard 8 is not applicable to this project.</p>

Secretary of the Interior’s Standards for Rehabilitation <sup>5</sup>	Project Conforms?	Discussion
<p><b>9:</b> New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.</p>	<p>Yes</p>	<p>The existing garage does not retain sufficient integrity and the ancillary building was constructed after the historic district’s period of significance. As such, they are not considered historic materials that characterize the property.</p> <p>The new garage would be compatible with the historic property as it is smaller in massing, size, and scale than the main residence. It would use similar materials as found on the main residence, including horizontal wood siding and wood doors and windows. It is differentiated from the existing garage in its slightly larger area that accommodates two modern vehicles. In addition, its use of contemporary materials and roll-up sectional wood garage doors helps to differentiate the garage as new construction at the property.</p>
<p><b>10:</b> New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.</p>	<p>Yes</p>	<p>There are no changes proposed to the historic main residence. The construction of a new detached garage would not impair the essential form and integrity of the historic property if removed in the future.</p>

As the above analysis demonstrates, the proposed project, as currently designed, complies with all relevant the Secretary of the Interior’s Standards for Rehabilitation. According to CEQA Guidelines Section 15126.4(b)(1), if a project complies with the Standards for Rehabilitation, the project’s impact “would generally be considered mitigated below a level of significance and thus is not significant.” Therefore, as currently designed, the proposed project would likely not result in project-specific impacts, and it does not appear that the project has the potential to cause a substantial adverse change to the historical resource as defined by CEQA.

## Conclusion

As the above analysis demonstrates, the proposed project, as currently designed, complies with general guidance provided by the *Secretary of the Interior's Standards for Rehabilitation*. Page & Turnbull finds the project also complies with the City of Orange Historic Preservation Design Standards, Standards for Historic Residential Buildings related to Garages and Accessory Structures.

220 S. Orange Street, Orange HRA [25305]  
Exhibits

## **EXHIBITS**

Exhibit A – 2005 DPR Form, 220 S. Orange Street

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

Primary # 30-159080  
HRI # 038446  
Trinomial ORA  
NRHP Status Code 1D

Other Listings:  
Review Code: \_\_\_\_\_

Reviewer: \_\_\_\_\_

Date: \_\_\_\_\_

Page 1 of 3

\*Resource Name or #:  
(Assigned by Recorder)

ORANGE\_S\_220\_\_APN\_390-391-08

P1. Other Identifier: \_\_\_\_\_

\*P2. Location:  Not for Publication  Unrestricted

\*a. County: Orange and (P2b and P2c or P2d. Attach a location map as necessary.)

\*b. USGS 7.5' Quad: \_\_\_\_\_ Date: \_\_\_\_\_ T \_\_\_\_\_ ; R \_\_\_\_\_ ; 1/4 of \_\_\_\_\_ 1/4 of Sec \_\_\_\_\_ ; B.M. \_\_\_\_\_

c. Address: 220 - S ORANGE ST, # \_\_\_\_\_ City: Orange Zip: 92866

d. UTM: (Give more than one for large and/or linear resources) Zone \_\_\_\_\_ ' \_\_\_\_\_ mE/ \_\_\_\_\_ mN

e. Other Locational Data: \_\_\_\_\_

\*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries. Continues on Pg.3.)

Materials: Frame - Wood siding

A one and one-half story Craftsman house with a single-gable roof, side-facing gables and wide lap siding. A gable roof dormer on the front is ornamented with cross-ties on the bargeboard and ornamental purlins. The main roof extends forward to form the porch overhang supported by wide tapered piers. It appears that half of the porch has since been enclosed.

\*P3b. Resource Attributes: (HP2)--Single family property  
(List attributes and codes)

\*P4. Resources Present:  Building  Structure  Object  Site  Element of District  District  Other (Isolates, etc.)



P5b. Description of Photo: 2005  
(View, date, accession #)

\*P6. Date Constructed/ Age and Source:

1911

Historic  Prehistoric  Both

\*P7. Owner and Address:

\*P8: Recorded by: (Name, affiliation, and address)

D. Gest, P. LaValley, D.  
Matsumoto

Chattel Architecture  
13417 Ventura Blvd.  
Sherman Oaks, CA 91423

\*P9. Date Recorded:

April, 2005

\*P10. Survey Type: (Describe)

Reconnaissance

\*P11. Report Citation: (Cite survey report and other sources, or enter "none.")

Orange County Assessor Records (2005). Chattel Architecture (2005)  
Historic Resources Survey. AEGIS (1991) Historic Building Inventory  
Update. Heritage Orange County, Inc. (1982) Orange Historic Survey.

\*Attachments:  NONE  Location Map  Continuation Sheet(s)  Building, Structure, and Object Record  
 Archaeological Record  District Record  Linear Feature Record  Milling Station Record  Rock Art Record  
 Artifact Record  Photograph Record  Other (List): \_\_\_\_\_

DPR 523A (1/95)

\*Required Information

Page 2 of 3

\*Resource Name or #: ORANGE\_S\_220\_\_APN\_390-391-08  
(Assigned by Recorder)

B1. Historic Name: Judge Christian C. Stoner House

B2. Common Name:

B3. Original Use: RES B4. Present Use: RES

\*B5. Architectural Style: Craftsman

\*B6. Construction History: (Construction date, alterations, and date of alterations) Date of Construction: 1911  Historic  Prehistoric  Both

It appears that half of the porch has since been enclosed.

\*B7. Moved?  No  Yes  Unknown Date: Original Location:

\*B8. Related Features:

\*B9. Architect or Builder: Unknown

\*B10. Significance: Theme: Architecture Area: City of Orange Property Type: Residence

Period of Significance: Old Towne: Early Settlement (c. 1870 - 1920) Applicable Criteria: AC

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity. Continues on Pg.4.)

Structural Integrity: Good Condition - No apparent change to original structure.

Site Integrity:

Opportunities:

As of 1919 and perhaps earlier, the owner of the house was Judge Christian C. Stoner. Mr. Stoner was reared in Indiana and served in the Civil War. He taught school and was elected to the Kansas State Legislature later. He then became Justice of the Peace and a Probate Judge there. In 1919, he came to Orange and bought an orange grove near El Modena. He then became a City Trustee and Acting Mayor for four years.

B11. Additional Resource Attributes: (List attributes and codes)

\*B12. References:  
Orange Daily News.

B13. Remarks: (Continues on Pg.3.)  
Status change since 1991 Survey: None.

(Sketch Map with North arrow required.)

\*B14. Evaluator: Robert Chattel  
\*Date of Evaluation: September, 2005

(This space reserved for official comments.)

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

Primary # 30-159080  
HRI # 038446  
Trinomial ORA

Page 3 of 3

\*Resource Name or #:  
(Assigned by Recorder)

ORANGE\_S\_220\_\_APN\_390-391-08

Recorded by:

D. Gest, P. LaValley, D. Matsumoto  
Chattel Architecture  
13417 Ventura Blvd.  
Sherman Oaks, CA 91423

Date Recorded: April, 2005

Continuation  Update

Years Surveyed: 1982, 1991, 2005

Description of Photo: 1991

Listed in National Register: 1997

General Plan: LDR # of Buildings: \_\_\_\_\_

Planning Zone: R-4 # of Stories: 2

Lot Acre: 0.1492 # of Units: 2

Principal Building Sqft: 2000

B6. Construction History (Continued from Pg.2):

B13. Remarks (Continued from Pg.2):

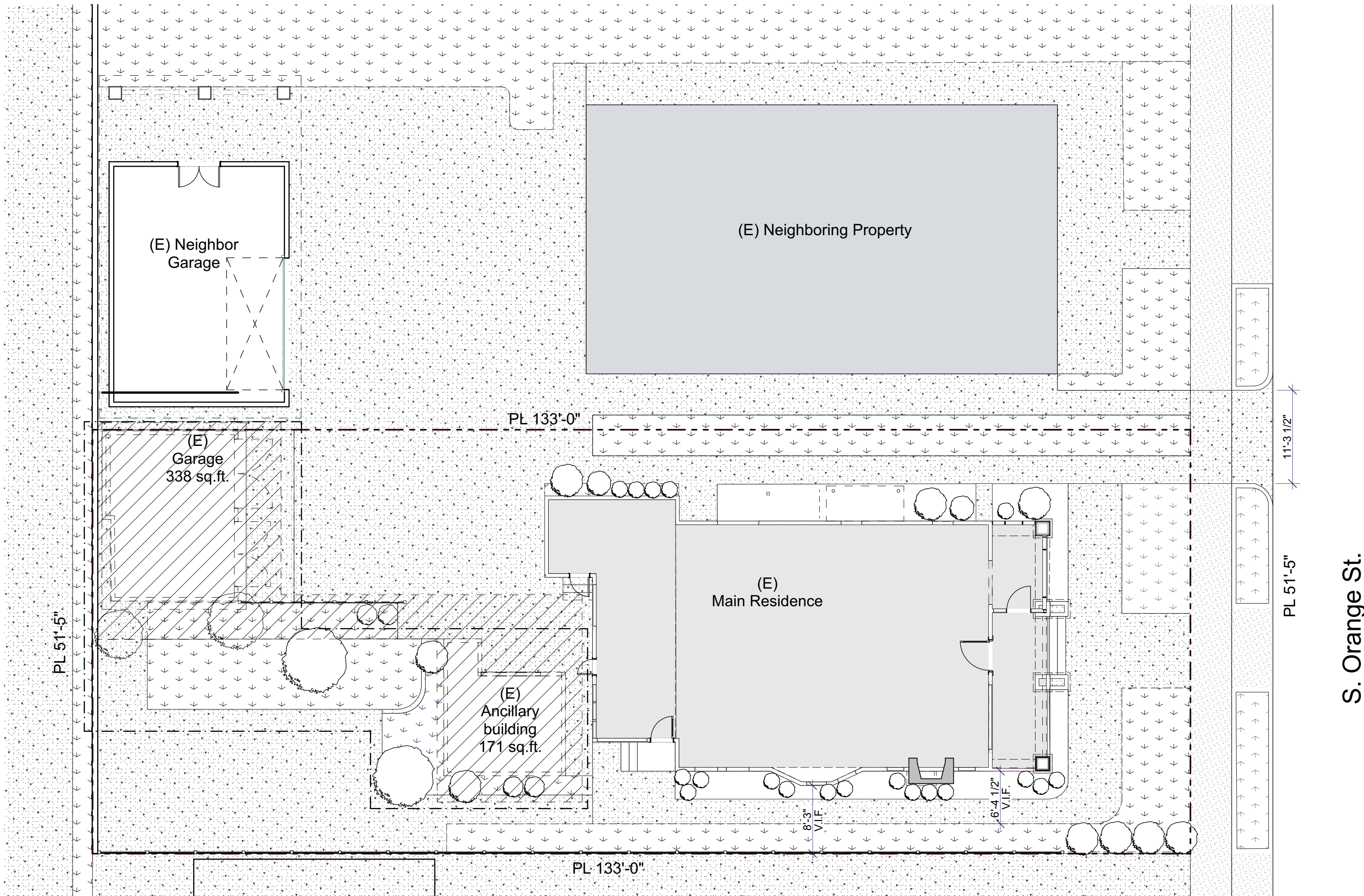
P3a. Description (Continued from Pg.1):



220 S. Orange Street, Orange HRA [25305]  
Exhibits

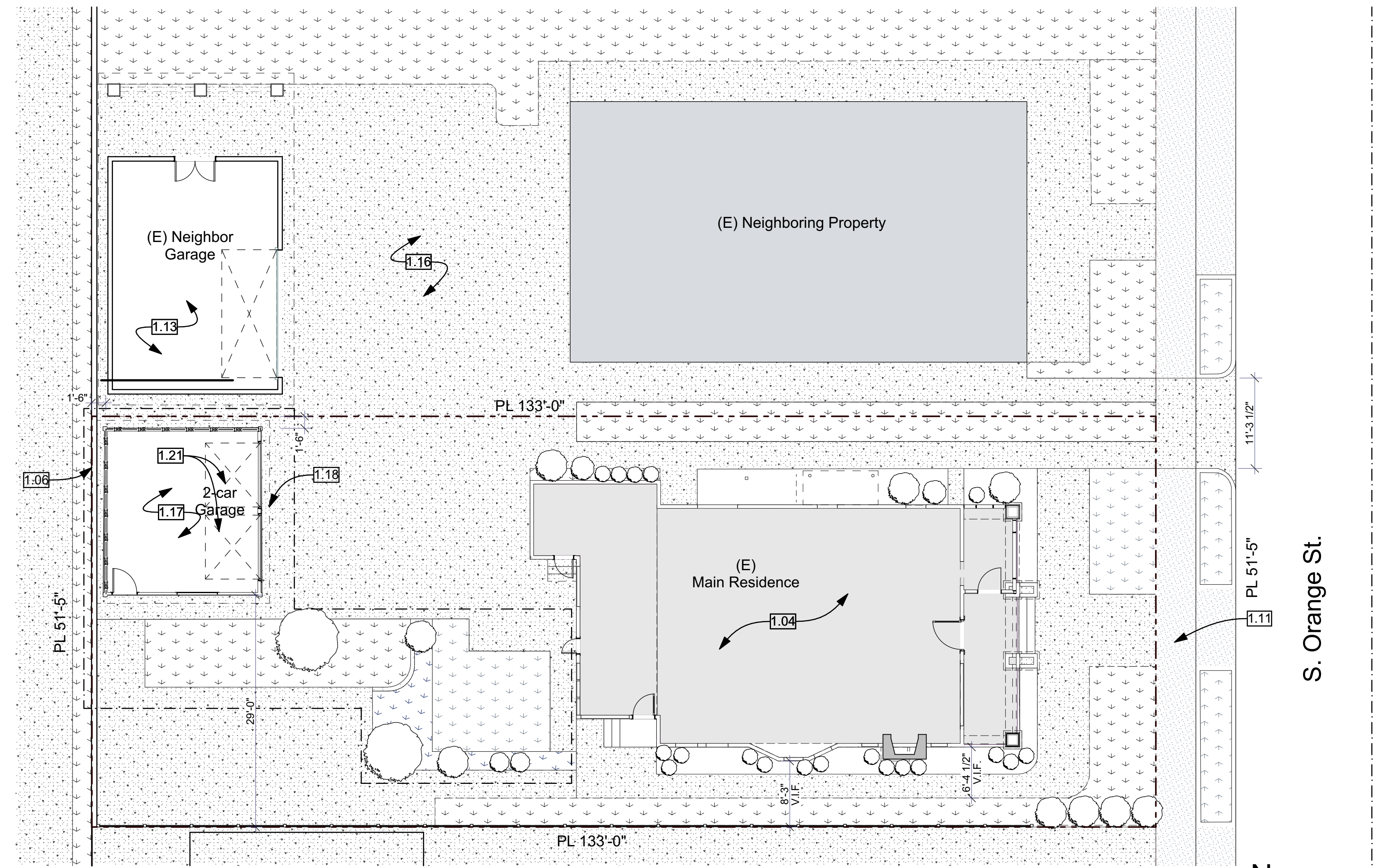
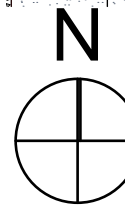
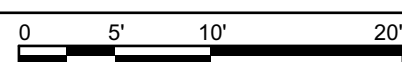
## Exhibit B – Proposed Project Drawings

The “Purvis Residence, Garage Replacement and Ancillary Building Removal, 220 S. Orange St, Orange 92886” drawing set was prepared by DSEA, Inc. dated February 13, 2026.



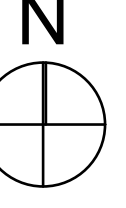
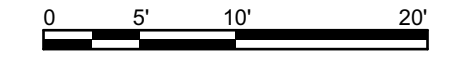
1 Existing/Demolition Site Plan

SCALE: 1" = 10'



2 Proposed Site Plan

SCALE: 1" = 10'



Site Plan Legend

- (E) Landscaping to remain.
- (E) Landscaping to be removed.
- (E) Concrete to remain.
- Proposed landscaping per owner direction.
- (E) Construction to be removed.
- (E) Tree to remain.
- Property Line

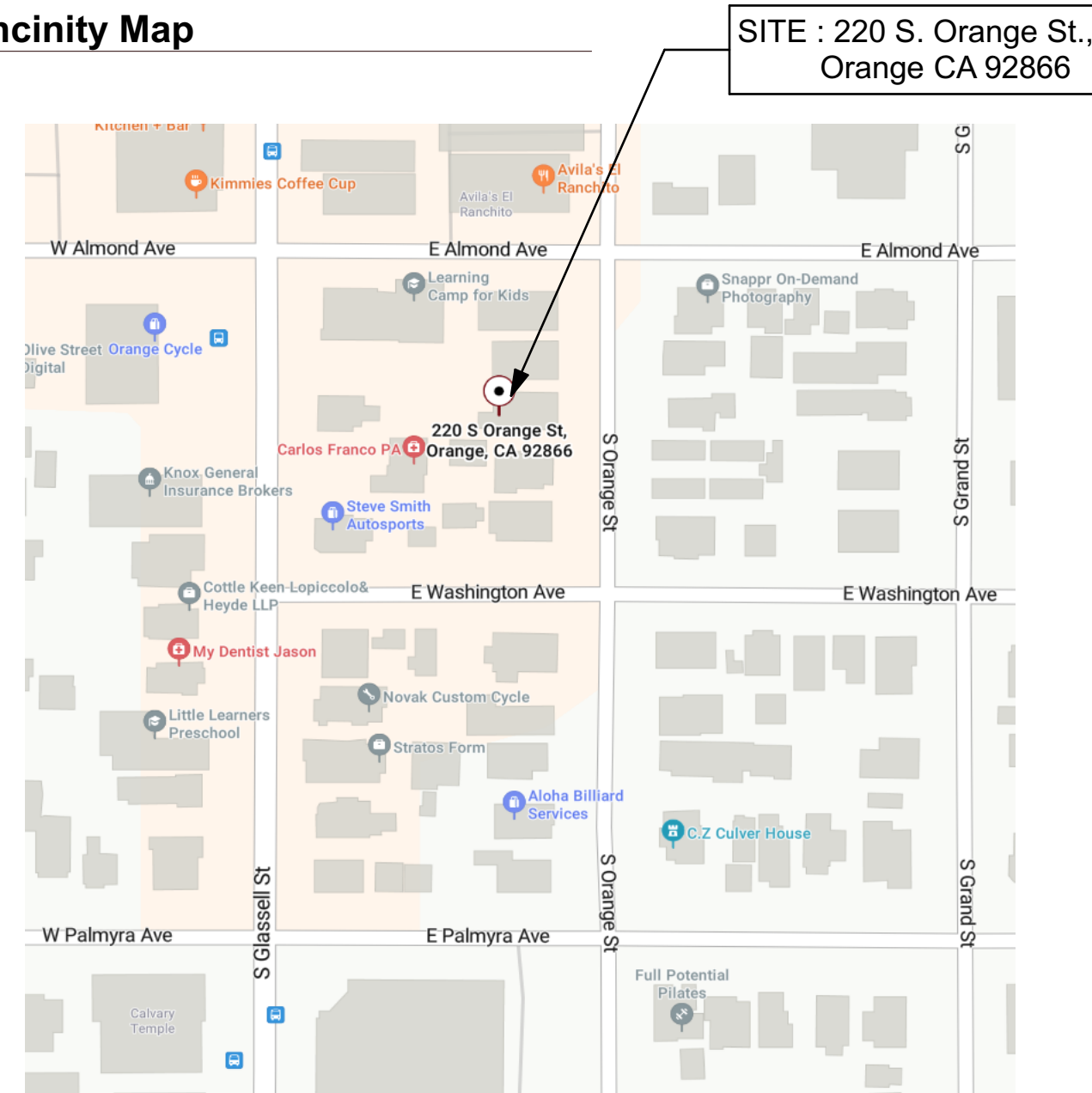
Site Plan Keynotes

- 1.04 (E) Main residence, not in contract
- 1.06 (E) 6' high masonry wall to remain
- 1.11 (E) Conc. sidewalk in public right of way
- 1.13 (E) Adjacent garage on the neighboring property.
- 1.16 (E) Conc. driveway on neighboring property
- 1.17 (N) Garage at a total square footage at 406 SF
- 1.18 Proposed overhead 1'-0" roof overhang
- 1.21 (N) Overhead sectional door

Sheet Index

- A-1.0 Existing Site Plan and Project Information
- A-2.0 Existing and Proposed Floor and Roof Plan
- A-3.0 Existing / Demolition Exterior Elevations
- A-4.0 Proposed Exterior Elevations
- A-4.1 Proposed Exterior Elevations
- A-5.0 Proposed Garage Accessory Structure Details
- A-6.0 Perspective Renderings
- A-7.0 Existing Conditions Photographs

Vicinity Map



Project Directory

**OWNER:**  
Kevin Purvis  
220 S. Orange St.  
Orange, CA 92868  
EMAIL: kevin.purvis@gmail.com  
PHONE: (310) 433-1075

**ARCHITECT:**  
DSEA Inc.  
143 S. Olive St.  
Orange, CA 92868  
OFFICE PHONE: (714) 639-3958  
EMAIL: dely@dseainc.com  
CONTACT: Douglas Ely

**CONSULTANT:**  
Company Address: Page & Turnbull  
523 W. 6th Street, Suite 1013  
Los Angeles, CA 90014  
CITY, COUNTY: Los Angeles, CA 90014  
OFFICE PHONE: (213) 221-1200  
CONTACT: Christina Okeas Brobst, Principal  
dikaas@page-turnbull.com  
EMAIL: Stacy Kozakovich, Project Manager  
kozakovich@page-turnbull.com  
CONTACT: Amanda Commins, Cultural Resources Planner  
commins@page-turnbull.com  
EMAIL:

Project Data (continue)

**OWNER:** Purvis Residence  
**APPLICANT:** DSEA Architecture Inc.  
143 S. Olive St.  
Orange, CA 92868  
Contact: Doug Ely  
Phone: (714) 639-3958  
Email: Dely@dseainc.com

**PROJECT ADDRESS:** 220 S. Orange St.  
Orange, CA 92866

**PROJECT DESCRIPTION:** The proposed project involves the demolition of an existing substandard detached garage and adjacent ancillary building and the construction of a new two-car garage located within the Old Towne Orange Historic District. The existing garage is approximately 338 square feet in size and is considered a non-contributing structure to the historic character of the property. Due to its limited size and condition it is unable to accommodate a standard modern vehicle and does not meet the functional needs of the property. The replacement garage is proposed to be approximately 412 square feet and will be designed in compliance with the Old Towne Design Standards. The design will be consistent with the architectural character and historic context of the neighborhood and drivers it's style from the former garage which used to occupy this location before it was partially removed for the neighboring property to built their garage. This project aims to enhance the functionality of the property while respecting the historic integrity of the district. Several neighboring properties have undertaken similar garage replacements in past years, setting a local precedent for compatible upgrades.

**APN#:** 390-391-08  
**ZONE:** R-1-6  
**EXISTING LOT AREA:** 6,838 sq. ft.  
**PROPOSED USE:** No change to existing use  
**OCCUPANCY GROUP:** R-3  
**CONSTRUCTION TYPE:** V8 (Non-Sprinklered)  
**PARKING:** (2) Enclosed garage parking spaces  
**STORIES:** (E) (1 -1/2) Story Residence  
Proposed Accessory Unit: (1) Story  
**EXISTING AREA:**  
(E) 1st Floor Residence 1,239 sq.ft.  
(E) 2nd Floor Residence 868 sq.ft.  
(E) Ancillary building 171 sq. ft.  
(E) Garage 338 sq. ft.  
Total 2,616 sq. ft.

Project Data (continue)

**PROPOSED AREA:**  
Proposed Garage 412 sq. ft.  
(E) Residence 2,107 sq. ft.  
Total 2,519 sq. ft.

**OPEN SPACE:** 1,560 sq. ft. > 900 sq. ft.

**FLOOR / AREA RATIO:** 2,519sq.ft. / 6,850 sq.ft.= .36

**LOT COVERAGE:** 2,519 sq.ft. / 6,850 sq.ft.= .36



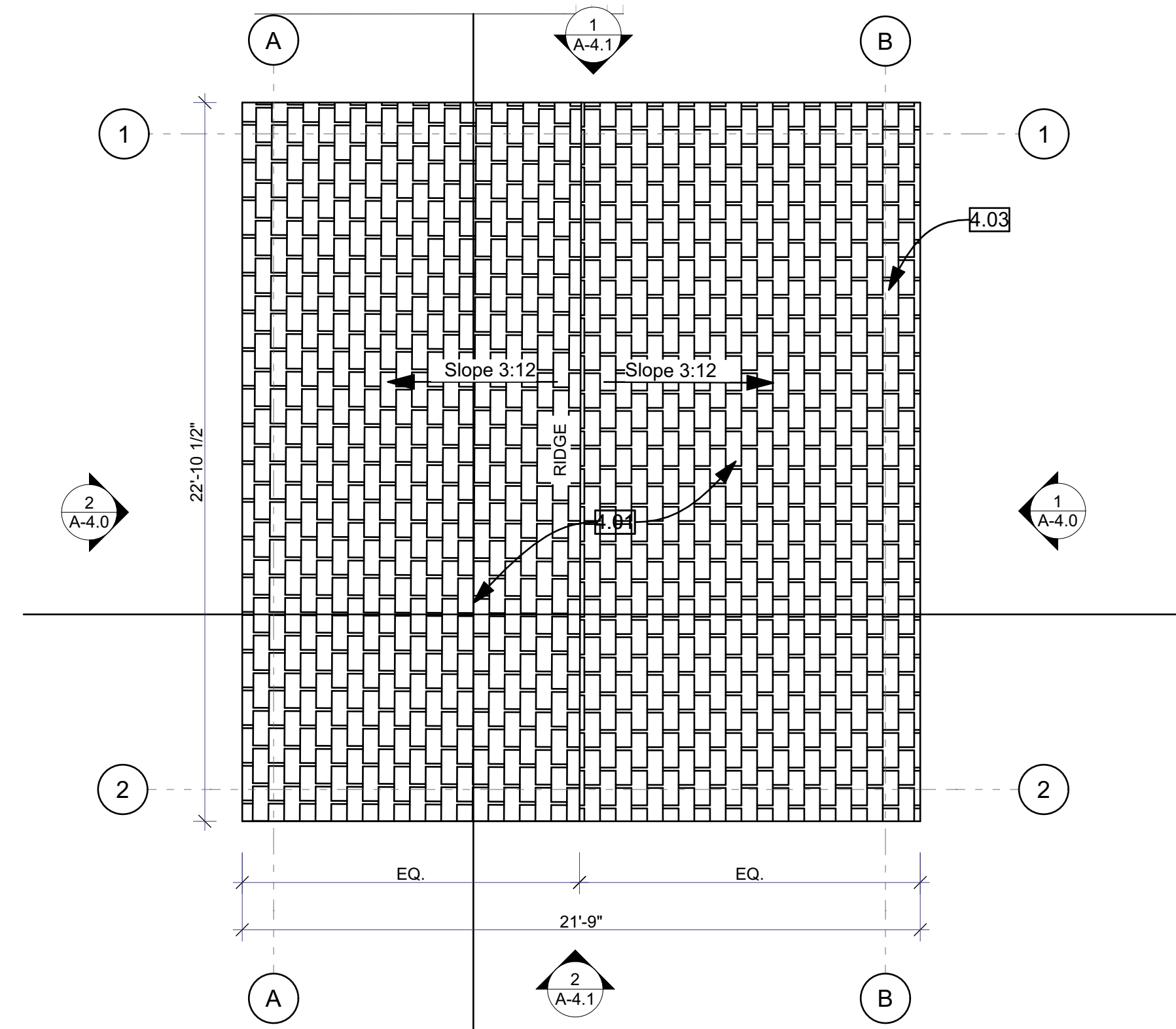
143 S. Olive Street  
Orange, CA 92866  
Contact Phone No.  
#Contact E-mail

Sheet Index, Project Data, Vicinity Map, Existing and Porposed Site Plan

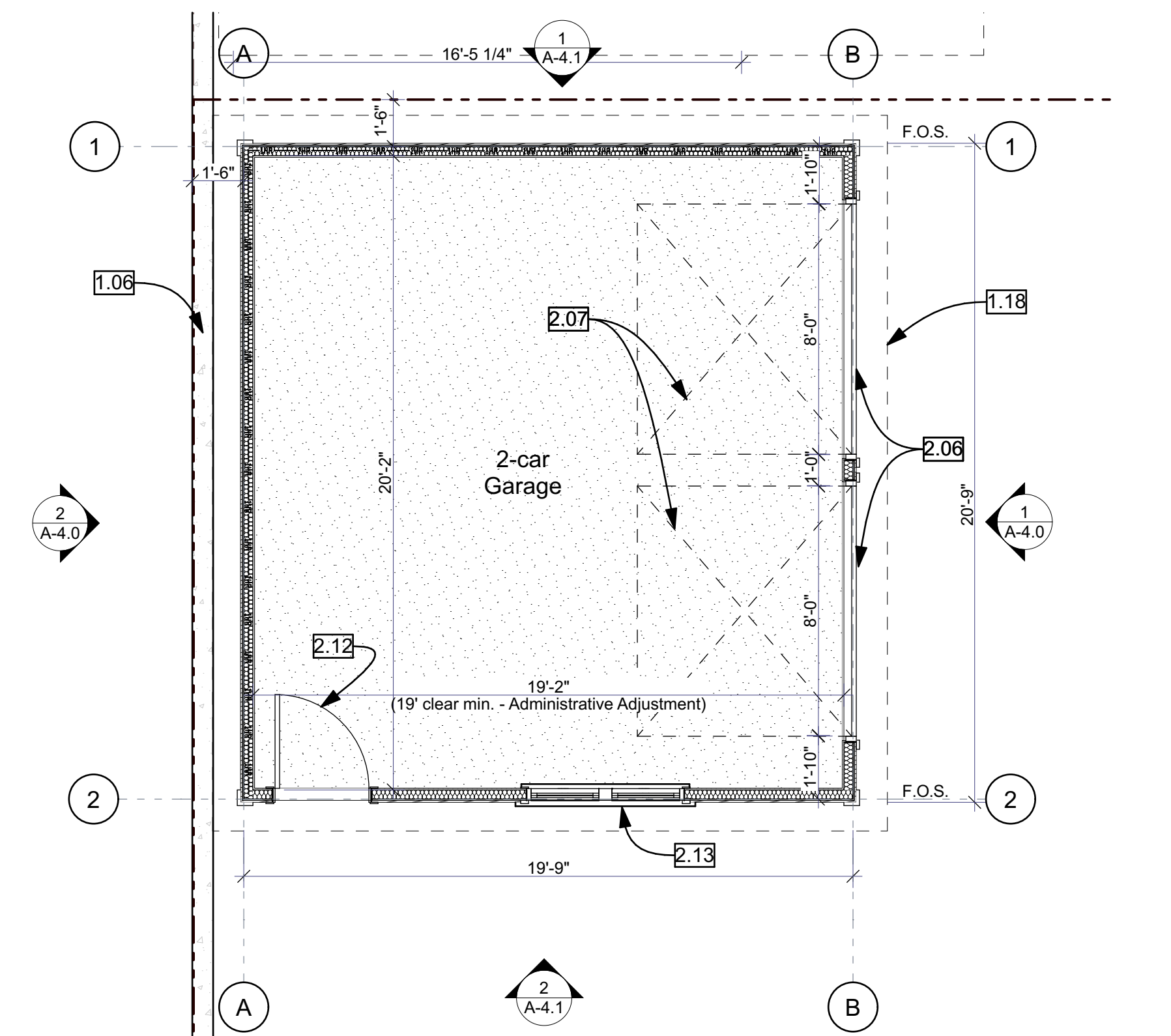
**Purvis Residence**  
Garage Replacement and Ancillary Building Removal  
220 S Orange St Site Full Address 2 Orange CA 92866

**A-1.0**

Printed on 2/13/2026



**1 Proposed Roof Plan**  
SCALE: 1/4" = 1'-0"



**2 Proposed Garage Floor Plan**  
SCALE: 1/4" = 1'-0"

**Demo / Proposed Floor / Roof Plan Keynotes**

- 1.06 (E) 6' high masonry wall to remain
- 1.18 Proposed overhead 1'-0" roof overhang
- 2.06 (N) Sectional wood door. Refer to Garage Door Specification
- 2.07 Line of sectional overhead door
- 2.08 (E) Hinged door to be removed
- 2.09 (E) Hinged door to be removed. Set inside fixed large panel door.
- 2.10 (E) Fence to be removed.
- 2.11 (E) Exterior stairway to 2nd floor
- 2.12 (N) Door
- 2.13 (N) Window
- 4.01 Class 'A' min. composite asphalt shingles installed per ICC-ESR 1389. Match to (E) residence roof style & color
- 4.03 Dashed line represents outline of the building

**Roof Plan Legend**

- Install Class 'A' comp. asphalt shingles of (2) layers #30 roofing felt per ICC-ESR 1389
- (E) Garage / Shed to be removed.

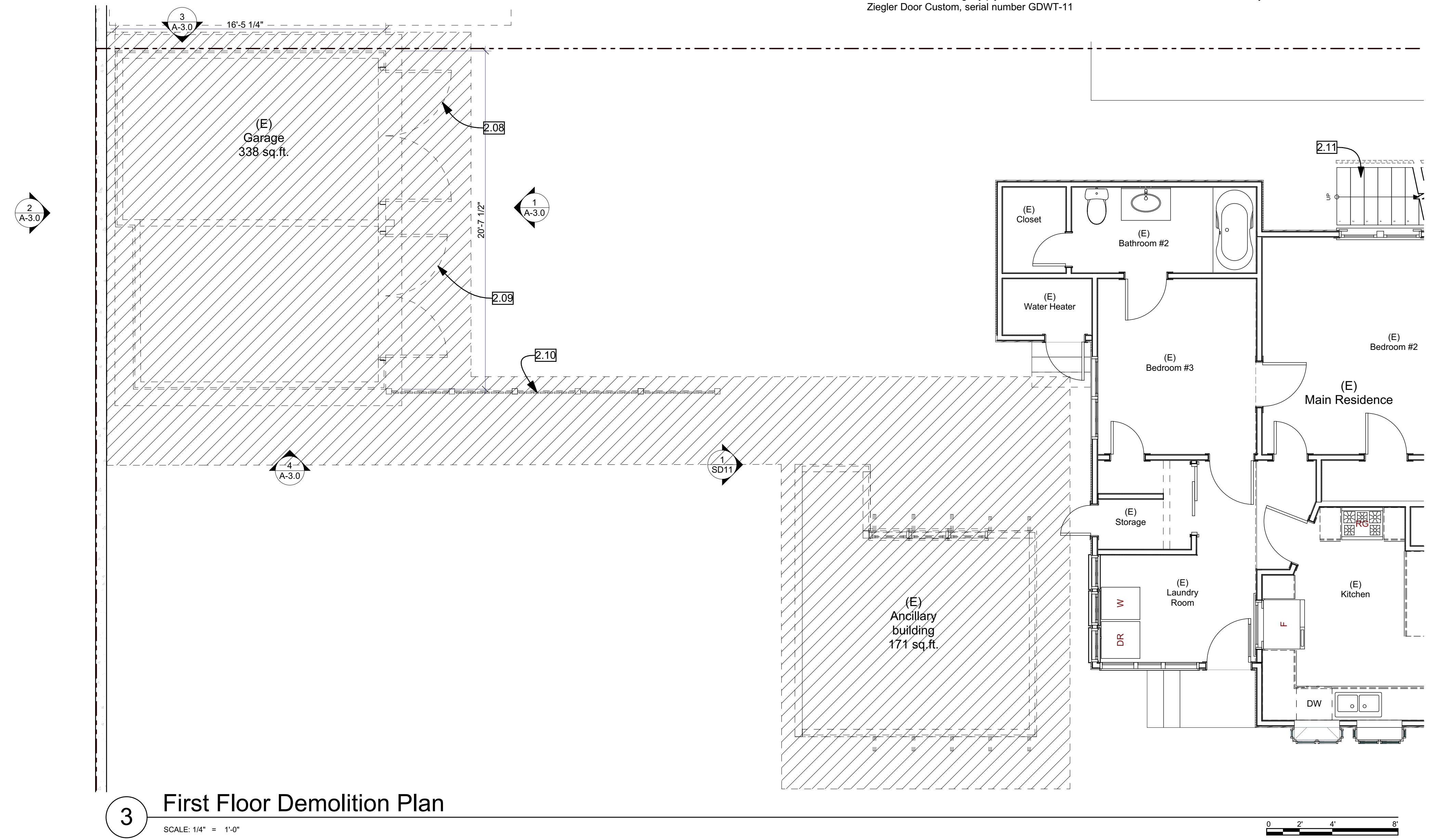
**Floor Plan Legend**

- Non-rated ext. wall assembly, 8" horizontal lapped siding of 1/2" plywood of 2x4 wood studs @ 16" o.c. w/ R-13 batt insul. w/ 5/8" gyp. bd @ int. Refer to elevations for finish information.
- Existing wall to remain
- 1 Hr rated wall assembly, 2x4 wood studs @ 16" o.c. with 5/8" Type 'X' gypsum board on the interior side and 1/2" gypsum board on both sides. Exterior sheathing to be plywood with 8" exposure wood siding. Refer to elevations for finish details.
- Existing wall to be demolished.
- Window. Refer to Window Schedule for more information.
- Door. Refer to Door Schedule for more information.

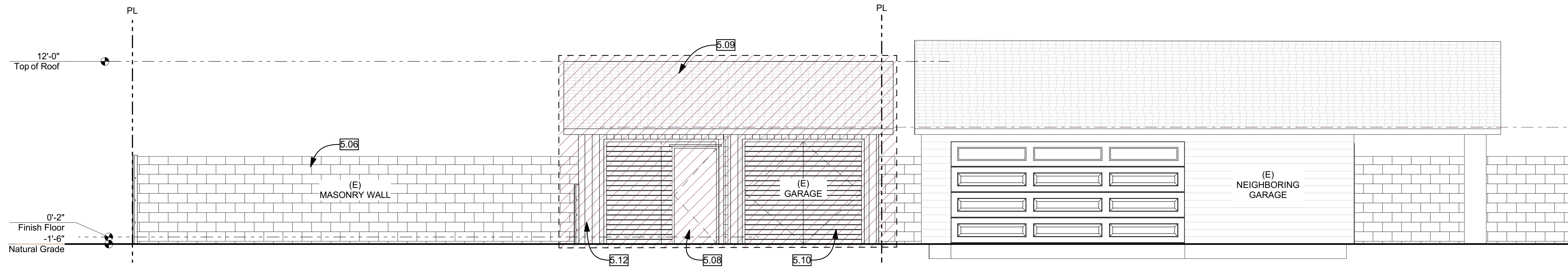
**Garage Door Specification**



Door Description: Custom Wood Sectional garage doors with wood stained finish. Each section is sheared with Mahogany plywood and insulated with an R- Value of 6.1. Manufacture by Ziegler Door Custom, serial number GDWT-11



**3 First Floor Demolition Plan**  
SCALE: 1/4" = 1'-0"



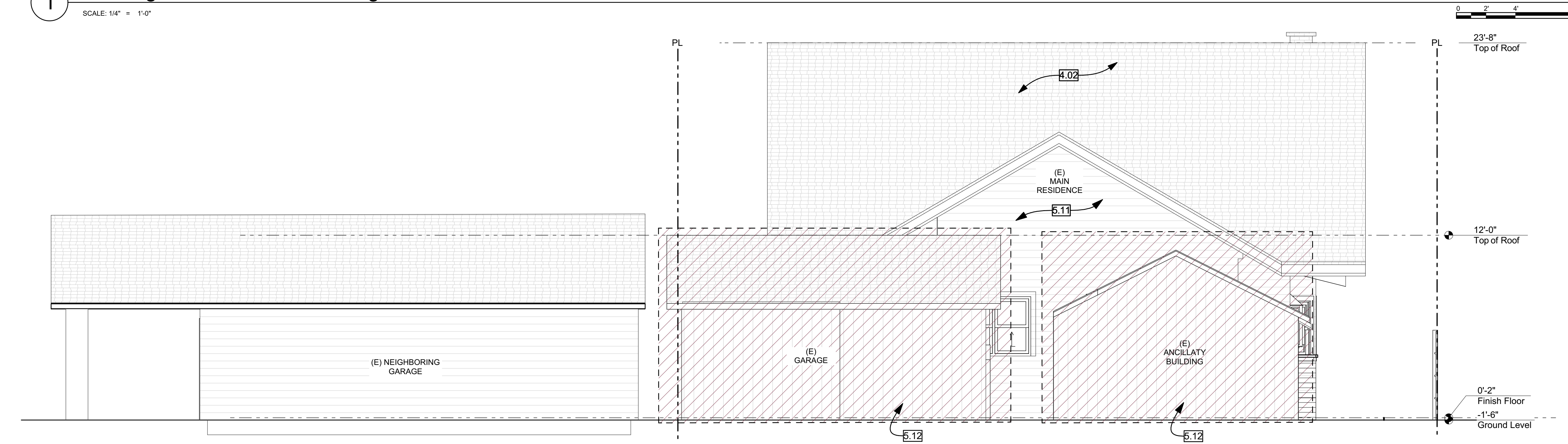
1 Existing/Demolition East Garage Elevation  
SCALE: 1/4" = 1'-0"

Existing / Demo Legend

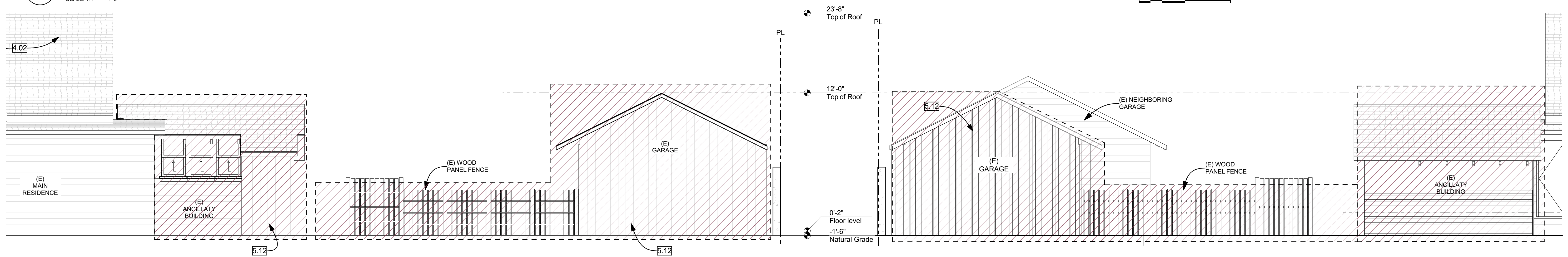
(E) Garage / Shed to be removed.

Exterior Elevation Keynotes

- 4.02 (E) Composite asphalt shingles roof to remain
- 5.06 6' High existing masonry wall to remain
- 5.08 (E) Man door cut into fixed
- 5.09 ((E) Composite Asphalt shingles roof to be removed
- 5.10 (E) 8'-0" wide X 6'-8" height double door to be removed
- 5.11 (E) Horiz. wood siding w/ 4" exposed to remain
- 5.12 (E) Vertical wood siding w/ 6" exposed to be removed



2 Existing/Demolition West Garage Elevation  
SCALE: 1/4" = 1'-0"



3 Existing/Demolition North Garage Elevation  
SCALE: 1/4" = 1'-0"

4 Existing/Demolition South Garage Elevation  
SCALE: 1/4" = 1'-0"



143 S. Olive Street  
Orange, CA 92866  
Contact Phone No.  
#Contact E-mail

Existing / Demolition Exterior Elevations

Purvis Residence

Garage Replacement and Ancillary Building Removal

220 S Orange St Site Full Address 2 Orange CA 92866

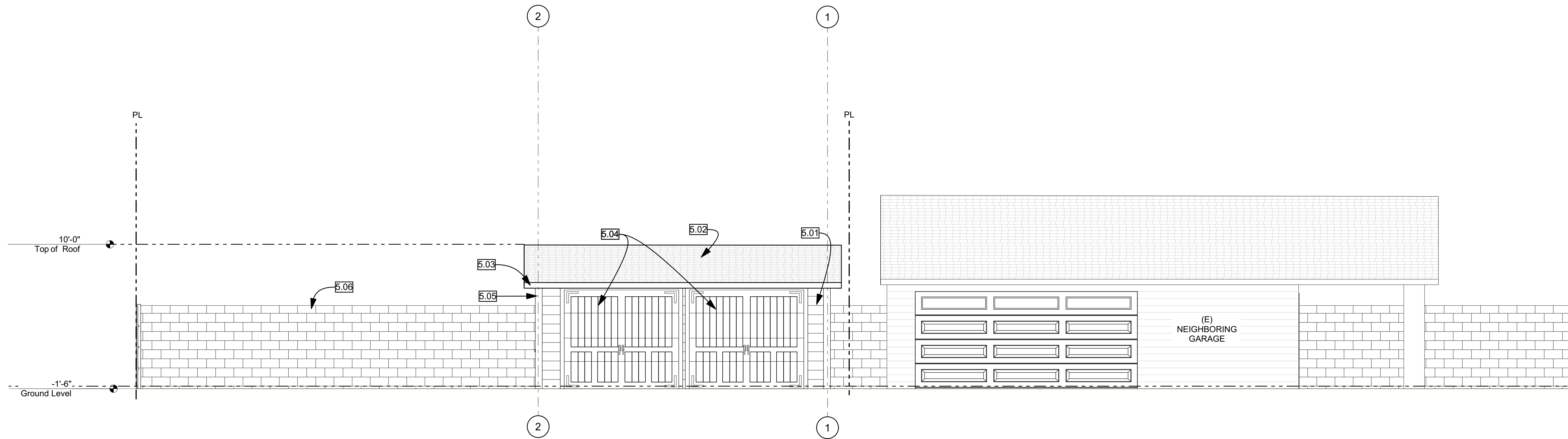
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A-3.0

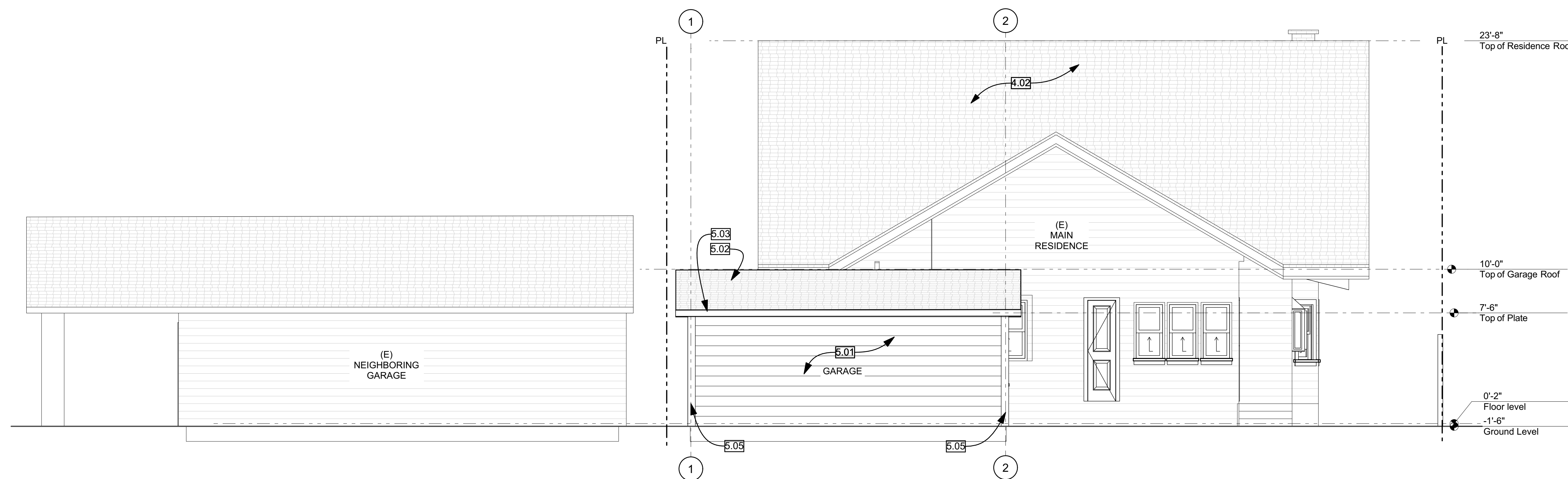
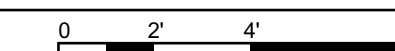
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**Exterior Elevation Keynotes**

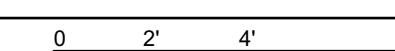
- 4.02 (E) Composite asphalt shingles roof to remain
- 5.01 Horiz. wood siding with 5" exposed painted white of 2 layers grade D bldg paper, typ.
- 5.02 Class 'A' min. composite asphalt shingles installed per ICC-ESR-1389
- 5.03 2x8 Wood fascia mounted to eave, typ.
- 5.04 (2) 8' x 6'-8" Garage door, refer to Garage Door Specification on Sheet A-2.0
- 5.05 6" X 6" wide wood trim at corner, typ.
- 5.06 6' High existing masonry wall to remain



**1** Proposed East Garage Elevation  
SCALE: 1/4" = 1'-0"

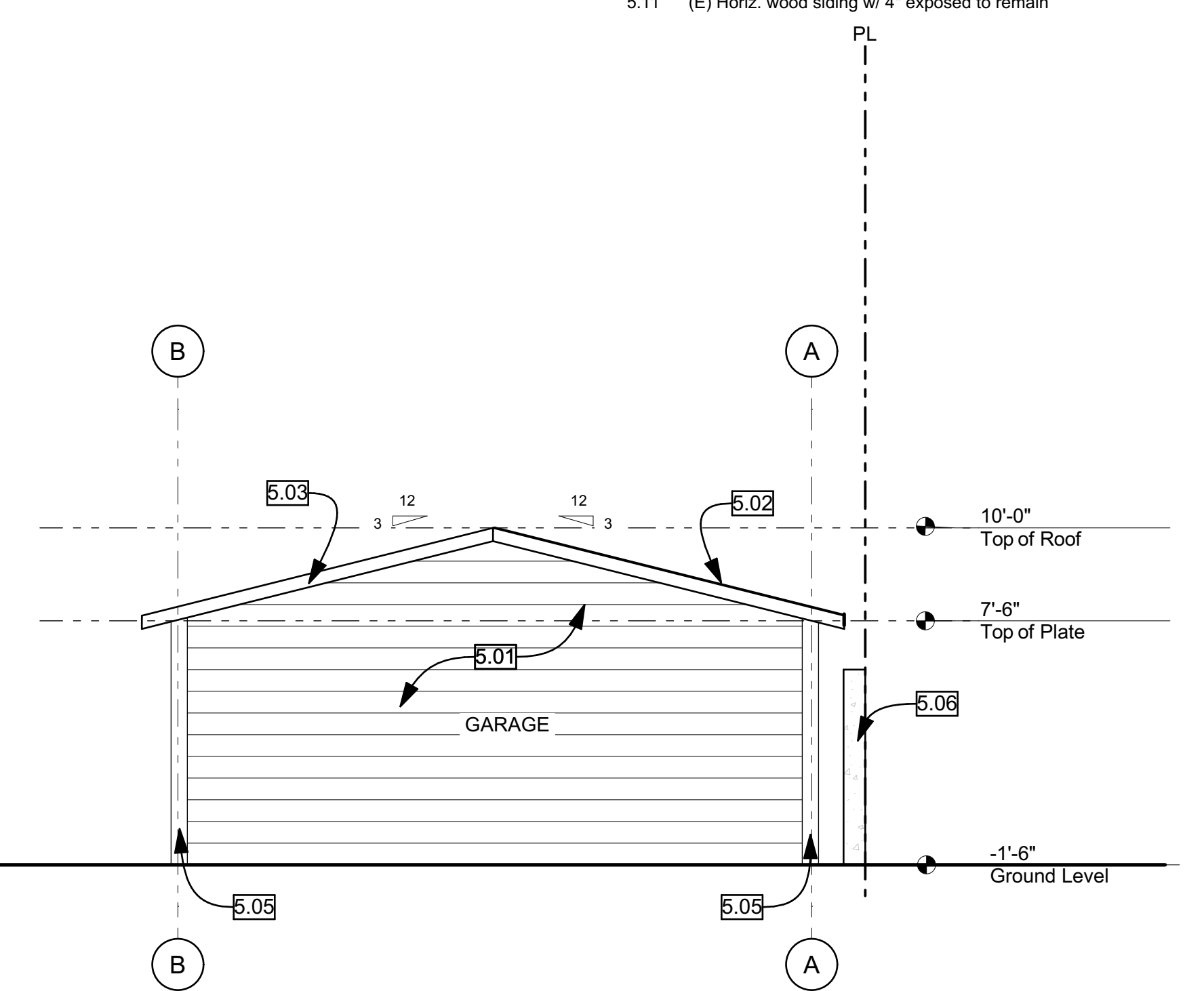
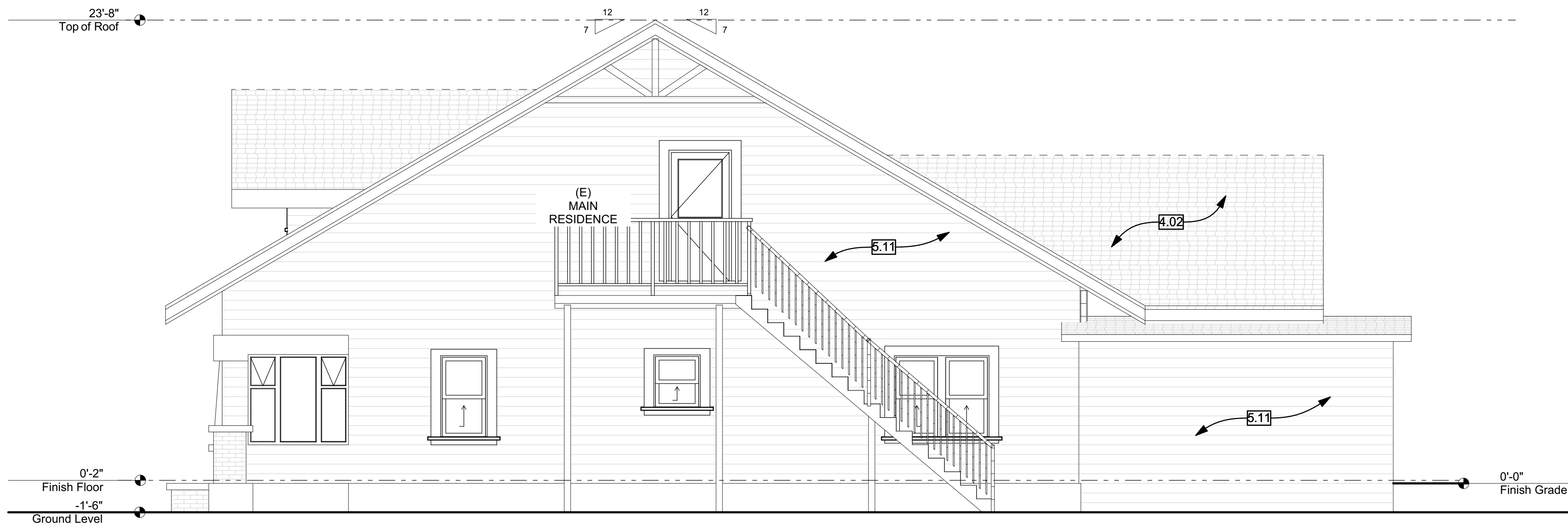


**2** Proposed West Garage Elevation  
SCALE: 1/4" = 1'-0"

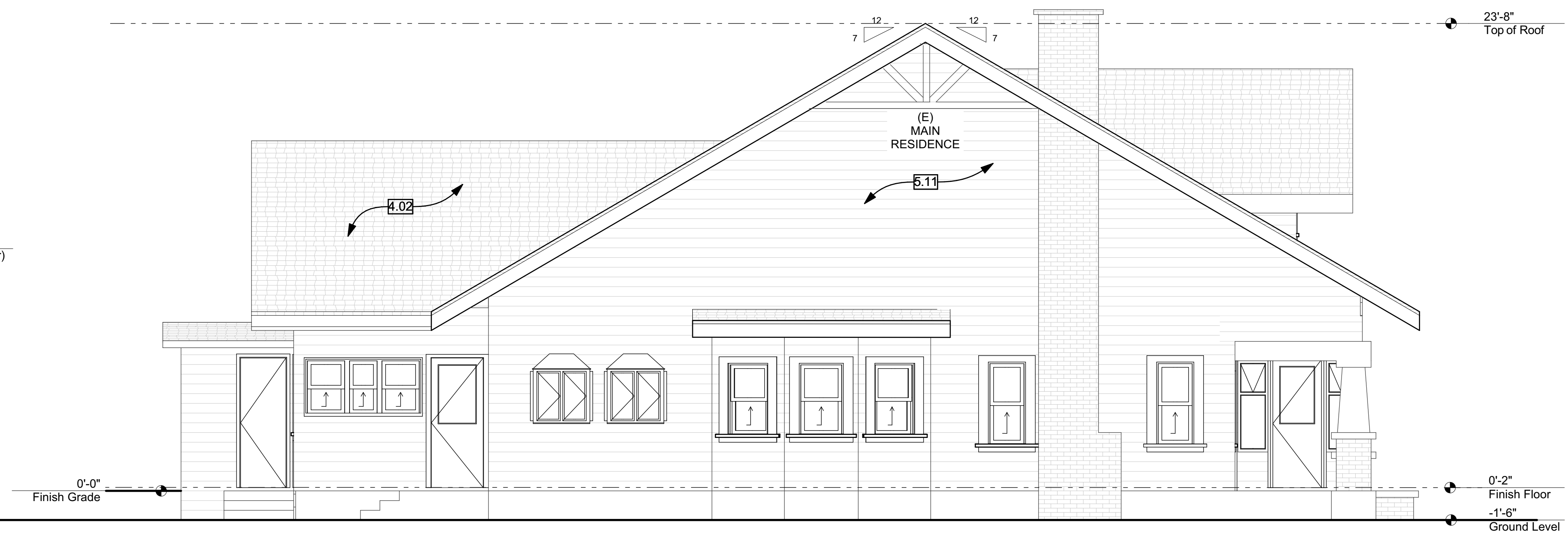
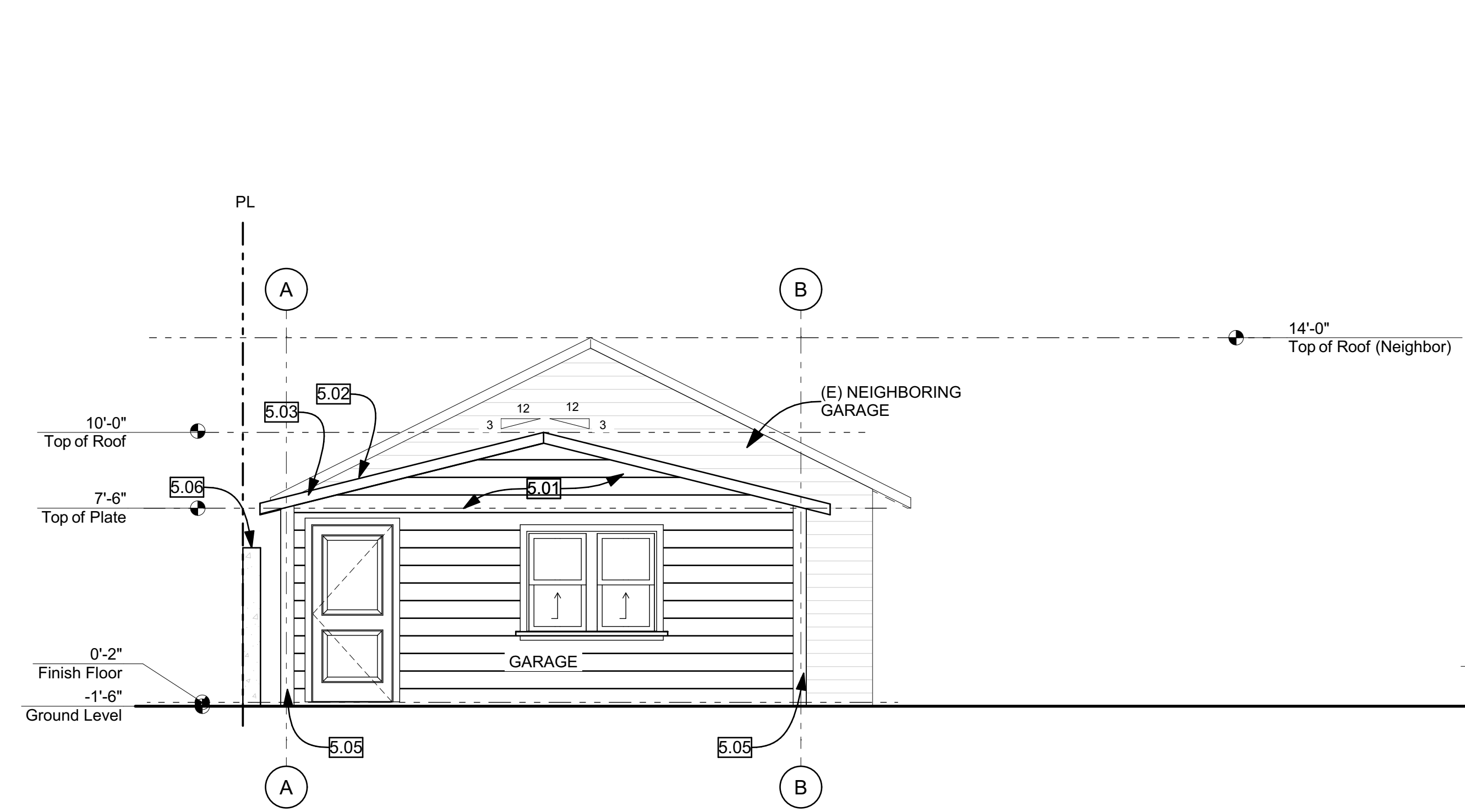
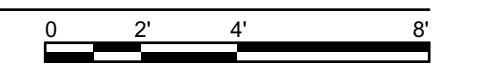


**Exterior Elevation Keynotes**

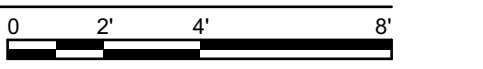
- 4.02 (E) Composite asphalt shingles roof to remain
- 5.01 Horiz. wood siding with 5" exposed painted white of 2 layers grade D bldg paper, typ.
- 5.02 Class 'A' min. composite asphalt shingles installed per ICC-ESR-1389
- 5.03 2x8 Wood fascia mounted to eave, typ.
- 5.05 6" X 6" wide wood trim at corner, typ.
- 5.06 6' High existing masonry wall to remain
- 5.11 (E) Horiz. wood siding w/ 4" exposed to remain



**1 Proposed North Garage Elevation**  
SCALE: 1/4" = 1'-0"



**2 Proposed South Garage Elevation**  
SCALE: 1/4" = 1'-0"



**DSEA**  
ARCHITECTURE | PLANNING | 3D MODELING  
143 S. Olive Street  
Orange, CA 92866  
Contact Phone No.  
#Contact E-mail

**Proposed Exterior Elevations**  
**Purvis Residence**  
**Garage Replacement and Ancillary Building Removal**  
220 S Orange St Site Full Address 2 Orange CA 92866

**A-4.1**