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California Cultural Resource Preservation Alliance, Inc.
An alliance of American Indian and scientific communities working for
the preservation of archaeological sites and other cultural resources.

January 6, 2021

Attention of Kevin Canning
OC Public Works
Development Services/Planning
301 North Ross Street
Santa Ana, CA 92701

Re: Notice of Preparation of a Draft Environmental Impact Report Legacy at Coto California Grand Villages

Dear Mr. Canning:

Thank you for the opportunity to comment on the above-referenced notice of preparation of a draft EIR for the proposed project. As indicated in the Cultural Resources Appendix, the project area is sensitive for the presence of buried archaeological resources. As the previous development did not include deep excavations for a parking garage or other features, the EIR should include provisions for a qualified archaeologist and culturally related Native American to monitor excavations within virgin soils.

Sincerely,

Patricia Martz, Ph.D.
President