

February 18, 2026

John Stack
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VIA EMAIL
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Subject: Cultural Resources Assessment Memorandum for the Mill Creek Master Plan Project in the City of Laguna Hills, California

Dear John Stack:

The purpose of this Memorandum (Memo) is to evaluate the impacts that would occur to cultural resources from construction of the Mill Creek Master Plan Project (hereinafter referred to as the "Project") located in the city of Laguna Hills within Orange County, California (Exhibit 1). More specifically, the Project site is located on the U.S. Geological Survey's El Toro and San Juan Capistrano 7.5-minute quadrangles of the San Bernardino Meridian at Township 06 South, Range 08 West, Sections 20, 21, 28, and 29 (Exhibit 2).

The Project proposes a residential development on a 19.21-acre site in the City of Laguna Hills along Mill Creek Drive, to the north of Ridge Route Drive. The development consists of single-family detached, five-story multi-family residential, triplex, and duplex units for a total of 480 residential units at a density of 23.3 dwelling units per acre. In addition, the Project includes two parks, Terrace Park and Corner Park, for a total of 0.78 acre, and parking spaces.

SETTING

Current Environmental Setting

Multiple businesses are currently located on the Project site. The businesses include, but are not limited to, a farmer's market, consultants, software companies, a wellness center, a fitness center, and a coffee shop. A reservoir is in the northeastern portion of the Project site.

Cultural Chronological Setting

Precontact Setting

Southern California has a long history of human occupation, with dates of the earliest evidence of human occupation during the late Pleistocene, circa (ca.) 11,000 years B.C. (Glassow et al. 2007: 191). Prehistoric material culture in the State's southern region has been categorized according to periods or patterns that define technological, economic, social, and ideological elements. Within these periods, archaeologists have defined cultural patterns or complexes specific to prehistory within the State's southern region, including the Project area.

The following text and table (Table 1) illustrates the chronological framework developed for Southern California. This framework is divided into four major periods: the Paleoindian period (ca. 11,000–7000 B.C.), the Milling Stone period (7000 B.C.–3000 B.C.), the Intermediate period (3000 B.C.–A.D. 500), and the Late Prehistoric period (A.D. 500–Historic Contact). Within these broad temporal periods are variations in the timing and nomenclature of cultural complexes for the region. The timescales referenced in the following discussion are presented as calendar dates (years B.C.–A.D.).

**TABLE 1
 CULTURAL CHRONOLOGY FOR PRECONTACT SOUTHERN CALIFORNIA**

| Period | Cultural Traits | Years (B.C.–A.D.) |
|------------------|---|--------------------------|
| Paleoindian | Clovis and Folsom Fluted Projectile Points | 11,000 B.C.–7000 B.C. |
| Milling Stone | Ground Stone Implements; Large Leaf-Shaped Projectile Points | 7000 B.C.–3000 B.C. |
| Intermediate | Large Side-Notched, Stemmed, and Leaf-Shaped Projectile Points; Mortar and Pestle | 3000 B.C.–A.D. 500 |
| Late Prehistoric | Smaller Projectile Points with Convex or Concave Bases, Bow and Arrow technology; Increased Population Size | A.D. 500–1769 |

Paleoindian Period (11,700–7000 B.C.)

Recent data from coastal and inland sites during this period indicate that the economy was a diverse mixture of hunting and gathering, with a major emphasis on aquatic resources in many coastal areas (Jones et al. 2001) and on Pleistocene lakeshores in eastern San Diego County (Moratto 1984:90–92). Although few Clovis-like or Folsom-like fluted points have been found in Southern California, it is widely thought that there was a greater emphasis on hunting at near-coastal and inland sites during the Paleoindian Period than in later periods (e.g., Dillon 2002; Erlandson et al. 1987). Subsistence patterns shifted around 6000 B.C., coincident with the gradual desiccation associated with the onset of the Altithermal, a warm and dry period that lasted for about 3,000 years. As the climate changed, greater emphasis was placed on plant foods and small animals.

Millingstone Period (7000–3000 B.C.)

The Milling Stone Period (Wallace 1955, 1978) is the earliest well-established period of occupation in Southern California (Glassow et al. 2007: 192). This period is characterized by an ecological adaptation to collecting, accompanied by a dependence on ground stone implements associated with the horizontal motion of grinding small seeds: milling stones (metates, slabs) and hand stones (manos, mullers). Milling stones are found in large numbers for the first time and become more numerous toward the end of this period. As evidenced by their tool kits and shell middens in coastal sites, people during this period practiced a mixed food-procurement strategy. Subsistence patterns became more specialized as groups became better adapted to their regional or local environments. Projectile points from the period are relatively rare, but are large and generally leaf-shaped, and were probably employed with darts or spears thrown with atlatls. Bone tools, such as awls, and items made from shell, including beads, pendants, and abalone dishes, are also quite uncommon. Evidence of weaving or basketry is present at a few sites. The mortar and pestle, associated with the vertical motion of pounding foods such as acorns, were introduced during the Milling Stone Period but did not become common until the Intermediate Period.

Intermediate Period (3000 B.C.–A.D. 500)

The Intermediate Period is characterized by a shift toward a hunting and maritime subsistence strategy, along with a wider use of plant foods. During this period, a pronounced trend toward greater adaptation to regional or local resources can be observed. For example, the remains of fish, land mammals, and marine mammals are increasingly abundant and diverse in sites along the Southern California coast. Chipped stone tools suitable for hunting are more common and both stylistically and technologically varied. Projectile points include large side-notched, stemmed, and lanceolate or leaf-shaped forms.

Koerper and Drover (1983) consider Gypsum Cave and Elko series points, which have a wide distribution in the Great Basin and Mojave Deserts between ca. 2000 B.C. to A.D. 500, diagnostic of this period. Larger knives, a variety of stone flake scrapers, and drill-like implements are common during this period. Shell fishhooks become an integral part of the tool kit. Bone tools, including awls, are more numerous than in the preceding period; and the use of asphaltum adhesive becomes more common.

Late Prehistoric Period (A.D. 500–1769)

During the Late Prehistoric Period, use of plant food resources increased in conjunction with land and marine mammal hunting. The variety and complexity of material culture also increased during this period, demonstrated by more diverse classes of artifacts. The recovery of many small, finely chipped projectile points, usually stemless with convex or concave bases, suggests an increased utilization of the bow and arrow for hunting rather than the atlatl and dart.

During this period, an increase in population size is accompanied by the advent of larger, more permanent villages with greater numbers of inhabitants (Wallace 1955:223). Some coastal and nearby coastal settlements were occupied by as many as 1,500 people. Many of these larger settlements were permanent villages where at least some people resided year-round. The populations of these villages may have also increased seasonally.

Ethnographic Setting

Ethnographically, the Project APE is located within the ancestral lands of the Juaneño peoples (Bean and Shipek 1978: 550). However, ethnographic data; especially from the past should be used cautiously because such information was collected from non-Native American researchers and their analyses often paint a picture of the Native American communities through a western or Eurocentric point of view. The best approach to learning about the Native American communities from North America is to listen to these communities and ask them to tell us about their histories versus non-Native Americans telling it for them. Nevertheless, it is well documented by both researchers and Native Americans that the Juaneño have occupied this part of the State since time immemorial as evidenced by the above in the discussion of the precontact history before the arrival of Europeans.

Juaneño/Acjachemen

The name Juaneño designates those peoples that fell under the control of the Mission at San Juan Capistrano. Specifically, it denotes the indigenous Native Americans living in and near the San Juan and San Mateo creek drainages, who called themselves the Acjachemen.

John Stack
February 18, 2026
Page 4

Prior to mission life, the Acjachemen territory consisted of the eastern Santa Ana Mountains to the coast and southward to San Juan Capistrano. The majority of the known ethnographic village sites are located primarily in this region. To this day, the San Juan Capistrano area has seen continuous habitation by the Juaneño people.

Thousands of local Native Americans, primarily consisting of Acjachemen but also including Gabrieliño, coastal and interior Luiseño, Serrano, and Cahuilla, resided at Mission San Juan Capistrano. The Mission's death register shows as many as 1,665 native burials in its cemetery by the early 19th century. The Mission population started to rapidly decline in the 19th century due to several factors: a large earthquake caused structural damage to the church, the Native populations experienced a decline in birth rates, and the population suffered from rapidly increasing mortality due to infectious diseases. The Juaneño lived in structured villages, with populations varying from 35 to 300 people, consisting of a single lineage to multiple clans in larger settings. While each village unit maintained economic and social ties to neighboring villages, they also maintained a well-defined resource area. The Juaneño exploited a wide variety of resources for their dietary needs. These consisted primarily of plant foods, including seeds, nuts, fruits, tubers, and greens. Marine resources constituted the largest sources of meat and consisted mostly of shellfish and fish. Marine resources were collected from open water, bay, and estuary habitats. Birds and mammals made up most of the remainder of the diet. Seasonal rounds of exploitation formed the basis for the successful procurement of various food types as evident by the settlement patterns still identifiable today from the remains of simple campsites to complex village sites.

Historic-Era Setting

The major historic periods for the greater Southern California area are defined by key events documented by participants, witnesses, historians, and cartographers. Paramount among these was the transfer of political control over Alta California, including the study area specifically.

- Spanish Period (1769–1821)
- Mexican Period (1821–1848)
- American Period (1848–Present)

The historic era encompasses the period of occupation by European descendants. This period marked a time of disease, exploitation, and deculturation of the native peoples beginning ca. 1769 with the founding of the Mission San Diego de Alcalá. The occupation and control by the Spanish was passed on to Mexico after the latter gained its independence in 1821. The Mexican Period, in turn, gave way to control by the United States subsequent to the Mexican-American War and the treaty of Guadalupe Hidalgo in 1848.

Spanish Period (1769–1821)

Spanish explorer Juan Rodriguez Cabrillo made a temporary landfall at the Chumash village of *Sisolop* (present-day Ventura) on October 12, 1542 (Grant 1978:518). He was the first of several early explorers, representing several nations, to explore the *Alta California* coast. However, the end of the prehistoric era in Southern California is marked by the arrival of the Gaspar de Portolá overland expedition from New Spain (Mexico) and founding of the first Spanish settlement at San Diego on July 16, 1769 (Johnston 1962).

John Stack
February 18, 2026
Page 5

Mexican Period (1821–1848)

Mexico's independence from Spain in 1821 brought the Mexican Period in Alta California. The new government of Mexico had a very different outlook on mission activities. Secularization of the missions, planned under the Spanish, was greatly accelerated by the Mexican government. Mexico secularized the missions in 1833 and expanded on the Spanish practice of granting large tracts of ranch land to soldiers, civil servants, and pioneers. Plans to provide land, training, and living quarters for the Native American population never developed, and the mission lands were soon under the control of a relatively few influential Mexican families. The rancho lifestyle was relatively short lived but remains an influential period in California history.

American Period (1848–Present)

Americans began to explore Alta California as early as 1826, when trapper Jedediah Smith arrived at Mission San Gabriel (Morgan 1953:200–202; Lewis 1993:441). An increasing influx of Americans from the eastern United States during the 1840s spurred an American challenge for the California territory. The American Period began with Mexico's defeat at the end of the Mexican-American War, resulting in the concession of California to the United States under the Treaty of Guadalupe Hidalgo on February 2, 1848 (Rolle 1998:91, 104). Only a few days before the treaty was signed, gold was discovered on the American River; however, the Gold Rush of 1848–1849 did not start until several months later.

American dominance became more apparent in 1850 when California became a State and was divided into 21 original counties (Marschner 2017). Orange County was formed after the time of statehood (1850) in 1889.

METHODS

South Central Coastal Information Center

Psomas conducted a literature review and records search from the South-Central Coastal Information Center (SCCIC) on October 2, 2024. The SCCIC is a designated branch of the California Historical Resources Information Center and houses records regarding archaeological and historic resources recorded in Los Angeles County. The records search included a 0.8-kilometer (0.5 mile) search radius around the proposed Project site and consisted of a detailed examination of the United States Geological Survey's 7.5-minute El Toro and San Juan Capistrano Quadrangles. The purpose of the literature review and records search was to identify precontact or historic archaeological sites or historic buildings and structures previously recorded within and around the Project site. Psomas also reviewed the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), local registers, and Archaeological Determinations of Eligibility. The records were reviewed to accomplish the following:

- Identify cultural resources (e.g., archaeological sites and built environments) in the Project site and surrounding areas;
- Identify and determine the adequacy of previous cultural resources studies in the Project site;
- Develop management recommendations for cultural resources within or adjacent to the Project site; and

John Stack
February 18, 2026
Page 6

- Assess what additional cultural resources studies would need to be undertaken for the proposed Project.

The results of the SCCIC records searches are presented below.

Cultural Resources Pedestrian Field Survey

Psomas surveyed the Project site on October 3, 2024. The entire Project site was surveyed by walking evenly spaced transects spaced no more than 10 meters (32 feet) apart. The Psomas archaeologist examined all areas considered highly sensitive for cultural resources and the ground surface for the presence of the following:

- Precontact artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools);
- Historic artifacts (e.g., metal, glass, ceramics);
- Sediment discoloration that might indicate the presence of a cultural midden; and
- Depressions and other features indicative of the former presence of structures or buildings (e.g., post holes, foundations).

Psomas maintained transect accuracy in the Project site using a Garmin global positioning system (GPS) receiver and Project field maps. A field notebook and a digital camera were used to record the survey conditions and findings. The results of the field survey are presented below.



FIGURE 1: OVERVIEW OF THE PROJECT SITE

RESULTS

South Central Coastal Information Center Results

The SCCIC literature review conducted by Psomas identified 27 previously prepared technical studies within 0.8 kilometer (0.5-mile) of the proposed Project site. Two of these studies—OR-01129 and OR-02406—occurred within the proposed Project site. Report OR-01129 was prepared by D. M. Vanhorn in 1982 and report OR-02406 was prepared by C. Duke in 2001.

The SCCIC records search identified one previously recorded cultural resource—CA-ORA-432—located within the proposed Project site. The cultural resource is described as a Millingstone Period precontact archaeological site situated above Veeh Reservoir and was documented by C. Reves and J.B. Houser in 1973. The archaeological resources recorded at the site include stone chopper tools (tool typically used for processing of food and/or chopping plants/branches), groundstone (mano and metate fragment), and a single fragment from a marine shellfish. All the archaeological resources were collected by Reves and Houser. In 1982, the site was revisited by D.M. Vanhorn from Ultrasystems, Inc. Vanhorn described that the archaeological site in his 1982 report—OR-01129—had been destroyed from development.

The SCCIC search results summary from the SCCIC are presented as Attachment A.

Cultural Resources Pedestrian Field Survey

As indicated above, Psomas surveyed the Project site, including the recorded location of archaeological site CA-ORA-01129 (Figure 2), on October 3, 2024. The archaeological pedestrian field survey did not identify archaeological and/or cultural resources within the Project site.



FIGURE 2: LOCATION OF CA-ORA-01129

John Stack
February 18, 2026
Page 8

CONCLUSIONS AND RECOMMENDAIONS

Psomas conducted cultural resources background investigations within the proposed Project site in the fall of 2024. The main goal of the investigations was to gather and analyze information needed to determine if the Project would have a significant impact on properties eligible for the NRHP and/or CRHR. The results of the 2024 SCCIC cultural resources records searches identified one previously recorded cultural resource within the Project site. The previously recorded resource includes a precontact archaeological site that has been destroyed by development. The cultural resources field survey did not identify new cultural resources. There is always a possibility that intact cultural resources may be present below the ground surface; therefore, Psomas recommends an archaeological monitor and tribal representative from the Juaneño Native American community be retained to monitor ground disturbance within undisturbed native sediment.

Sincerely,
P S O M A S



Charles Cisneros, M.S., RPA
Cultural Resources Manager/Project Manager

Attachment 1 South Central Coastal Literature Review and Records Search Results
Exhibits: Exhibit 1 – Project Field Map
Exhibit 2 – Project U.S. Geological Survey 7.5 – Minute Quadrangle

John Stack
February 18, 2026
Page 9

REFERENCES CITED

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- Dillon, Brian D. 2002. California Paleo-Indians: Lack of Evidence, or Evidence of a Lack? In *Essays in California Archaeology: A Memorial to Franklin Fenenga*, edited by William J. Erlandson J. M., T. C., and R. Carrico. 1987. A Fluted Projectile Point Fragment from the Southern California Coast: Chronology and Context at CA-SBA-1951. *Journal of California and Great Basin Anthropology* 9:120–128.
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John Stack
February 18, 2026
Page 10

Heizer, pp. 25–36. Handbook of North American Indians, Vol. 8, William G. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

———. 1955. A Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11(3):214–230

ATTACHMENT 1

**SOUTH CENTRAL COASTAL LITERATURE REVIEW
AND RECORDS SEARCH RESULTS**

Report List

3KIN020100

| Report No. | Other IDs | Year | Author(s) | Title | Affiliation | Resources |
|------------|-----------|------|---------------------|--|--|--|
| OR-00066 | | 1976 | Desautels, Roger J. | Archaeological Survey Reports on Ridge Route Drive and Moulton Parkway (VEEH Reservoir) Road Widening and Installation, Laguna Hills Area, Orange County, California | Scientific Resource Surveys, Inc. | |
| OR-00143 | | 1976 | Desautels, Roger J. | Archaeological Survey Report on 85(+ Or -) Acres of Land Located in the Laguna Hills Area of the County of Orange Tract No's 9610, 9611, 9612, and 9613 | Scientific Resource Surveys, Inc. | |
| OR-00305 | | 1979 | Schroth, Adella | The History of Archaeological Research on Irvine Ranch Property: the Evolution of a Company Tradition | Archaeological Resource Management Corp. | 30-000002, 30-000044, 30-000047, 30-000048, 30-000051, 30-000053, 30-000059, 30-000060, 30-000061, 30-000062, 30-000063, 30-000064, 30-000065, 30-000066, 30-000067, 30-000068, 30-000069, 30-000070, 30-000071, 30-000072, 30-000073, 30-000077, 30-000091, 30-000099, 30-000100, 30-000104, 30-000106, 30-000107, 30-000109, 30-000111 |
| OR-00737 | Paleo - | 1984 | Padon, Beth | Cultural Resources Assessment Planning Area 34b Orange County, California | LSA Associates, Inc. | |
| OR-00742 | Paleo - | 1984 | Padon, Beth | Historic Property Survey Report for Irvine Center Drive Widening | LSA Associates, Inc. | |
| OR-00841 | Paleo - | 1986 | Mason, Roger D. | Archaeological, Historical, and Paleontological Assessments for Planning Area 34b, City of Irvine | Scientific Resource Surveys, Inc. | |
| OR-00847 | | 1985 | Padon, Beth | Archaeological Resource Inventory City of Irvine and its Sphere of Influence | LSA Associates, Inc. | 30-000161, 30-000349, 30-000361, 30-000383, 30-000478, 30-000494, 30-000495, 30-000496, 30-000499, 30-000545, 30-000601, 30-000734, 30-000735, 30-000767, 30-000803, 30-000804, 30-000805, 30-000806, 30-000807, 30-000808 |
| OR-00945 | | 1982 | Van Horn, David M. | Rossmoor Business Park Liquidating Trust Properties | Ultra Systems, Inc. | 30-000610 |
| OR-01109 | | 1986 | Padon, Beth | Addendum to the Historic Property Survey Report for Irvine Center Drive Widening | LSA Associates, Inc. | |
| OR-01129 | | 1982 | Van Horn, David M. | Cultural Resource Assessment: the Koll Property Near Laguna Hills; a Possible Annexation Area for the City of Irvine and its Sphere of Influence | Archaeological Associates, Ltd. | 30-000014, 30-000015, 30-000016, 30-000267, 30-000268, 30-000414, 30-000415, 30-000421, 30-000432, 30-000551, 30-000604, 30-000610, 30-000823, 30-000854, 30-001007 |

Report List

3KIN020100

| Report No. | Other IDs | Year | Author(s) | Title | Affiliation | Resources |
|------------|----------------------|------|--|--|--|---|
| OR-01344 | | 1993 | Rosenthal, Jane | Cultural Resources Element City of Laguna Hills, Orange County, California | LSA Associates, Inc. | 30-000354, 30-000355, 30-000432, 30-000515, 30-000551, 30-000604, 30-000659, 30-000702, 30-000703, 30-000769, 30-000849 |
| OR-02208 | | 2001 | Brown, Joan C. | Cultural Resources Literature and Records Review and Reconnaissance for the Gate 12 Area Earthwork Import Project, Located in the City of Laguna Woods, Ca | RMW Paleo Associates, Inc. | 30-000015, 30-000119, 30-000268, 30-000432, 30-001006 |
| OR-02225 | Other - Irvine Ranch | 1978 | Strozier, Hardy | The Irvine Company Planning Process and California Archaeology- A Review and Critique | The Irvine Company | |
| OR-02267 | Paleo - | 2000 | Hunt, Kevin P. and Brian F. Smith | An Archaeological and Paleontological Survey of the Irvine Spectrum GPA Project | Brian F. Smith and Associates | 30-000161, 30-000341, 30-000391, 30-000432, 30-000495, 30-000499, 30-000551, 30-000602, 30-000768, 30-000769, 30-000904, 30-001011, 30-001034, 30-001069, 30-001110, 30-100297, 30-100298 |
| OR-02336 | Paleo - | 2000 | Demcak, Carol R. and Milos Velechovsky | Final Report on Archaeological and Paleontological Monitoring Program Conducted at Spectrum 5, Irvine, Orange County, California | Archaeological Resource Management Corp. | |
| OR-02337 | Paleo - | 2000 | Demcak, Carol and Milos Velechovsky | Final Report on Archaeological and Paleontological Monitoring Program Conducted at Spectrum 6, City of Irvine, Orange County, California | Archaeological Resource Management Corp. | |
| OR-02406 | Cellular - | 2001 | Duke, Curt | Review of Cingular Wireless Facility SC 008-02 | LSA Associates, Inc. | |
| OR-02534 | | 1976 | | Annual Report to The Irvine Company from Archaeological Research, Inc. | ARI | 30-000051, 30-000064, 30-000099, 30-000100, 30-000106, 30-000119, 30-000130, 30-000184, 30-000196, 30-000197, 30-000484, 30-000518, 30-000575 |
| OR-02626 | | 2003 | Younger, Shannon and Smith, Brooks | Results of Archaeological Construction Monitoring Planning Area 27 Needlegrass Creek Conservation Area, Irvine, California | LSA Associates, Inc. | |
| OR-03743 | | 2009 | Losee, Carolyn | Cultural Resources Investigation for T-Mobile LA02880E "Maxwell" 88 Maxwell, Irvine, Orange County, California 92618 | Archaeological Resources Technology | |

Report List

3KIN020100

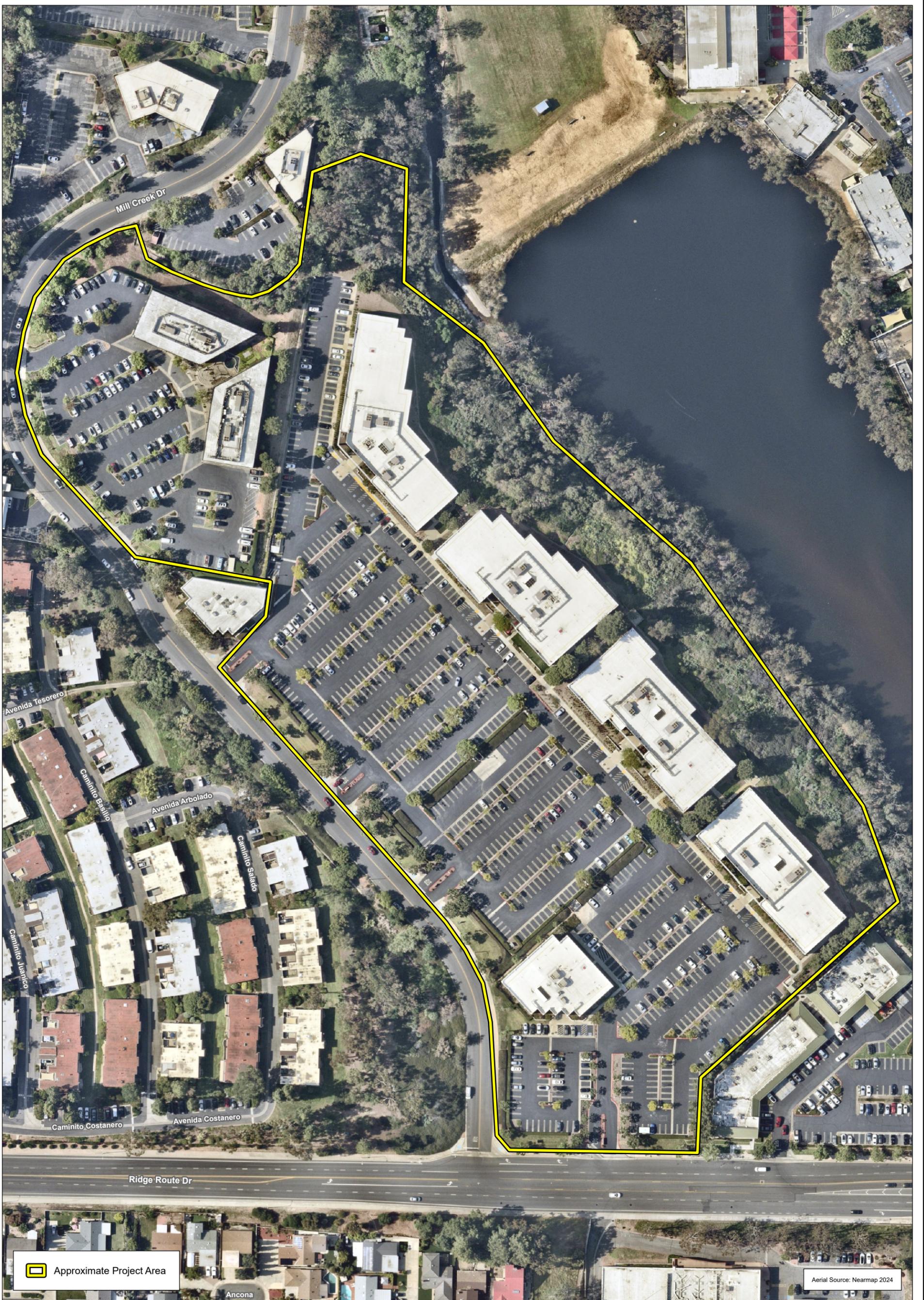
| Report No. | Other IDs | Year | Author(s) | Title | Affiliation | Resources |
|------------|-----------|------|------------------------------------|---|-------------|---------------------------------|
| OR-04289 | | 2012 | Stone, David and Victorino, Ken | Archaeological Survey Report Tertiary Treatment Plant and Recycled Water Distribution System Expansion Project Laguna Hills and Laguna Woods, Orange County, California | Dudek | 30-000014, 30-000015, 30-000268 |

Resource List

3KIN020100

| Primary No. | Trinomial | Other IDs | Type | Age | Attribute codes | Recorded by | Reports |
|-------------|---------------|-----------|------|-------------|-----------------|---|--|
| P-30-000432 | CA-ORA-000432 | | Site | Prehistoric | AP02 | 1973 (REEVES, Archaeological Research, Inc); 1982 (David Van Horn, Archaeological Associates, ltd) | OR-01011, OR-01129, OR-01344, OR-01995, OR-02208, OR-02267, OR-03467 |

EXHIBITS



 Approximate Project Area

Aerial Source: Nearmap 2024

Field Map

3KIN020100 - Mill Creek Master Plan



In-House



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