

PALEONTOLOGICAL ASSESSMENT FOR THE 100 AND 200 WEST SINCLAIR STREET PROJECT

**CITY OF PERRIS,
RIVERSIDE COUNTY, CALIFORNIA**

APNs 303-080-012, -013, and -015

Submitted to:

**City of Perris
Planning Division
135 North D Street
Perris, California 92570**

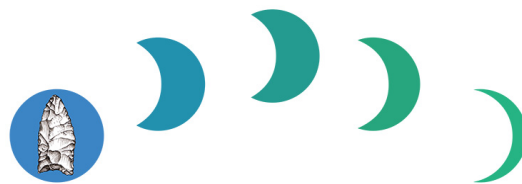
Prepared for:

**First Industrial Acquisitions II, LLC
and their Affiliates and Assigns;
First Industrial Realty Trust, Inc.;
First Industrial, LP
One North Wacker Drive, Suite 4200
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Prepared by:

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June 12, 2023; Revised November 15, 2023



BFSA Environmental Services
A Perennial Company

Paleontological Database Information

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Report Date: June 12, 2023; Revised November 15, 2023

Report Title: Paleontological Assessment for the 100 and 200 West Sinclair Street Project, Perris, Riverside County, California

Prepared for: First Industrial Acquisitions II, LLC
and their Affiliates and Assigns,
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Submitted to: City of Perris
Planning Division
135 North D Street
Perris, California 92570

Assessor's Parcel Numbers: 303-080-012, -013, and -015

USGS Quadrangle: Section 7, Township 4 South, Range 3 West, San Bernardino Baseline and Meridian of the *Perris, California* (7.5-minute) Quadrangle

Study Area: 20.2 acres plus potential off-site improvement areas

Key Words: Paleontological resource assessment; Pleistocene very old alluvial fan deposits; high paleontological sensitivity; city of Perris; full-time monitoring of excavation.

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I. INTRODUCTION AND LOCATION

This paleontological resource assessment has been completed for the 100 and 200 West Sinclair Street Project (Assessor’s Parcel Numbers [APNs] 303-080-012, -013, and -015), located west of North Perris Boulevard at the western terminus of Sinclair Street in the city of Perris, Riverside County, California (Figures 1 and 2). On the U.S. Geological Survey, 7.5-minute, 1:24,000-scale *Perris, California* topographic quadrangle map, the project site is located in Section 7, Township 4 South, Range 3 West, San Bernardino Baseline and Meridian (see Figure 2). The project applicant proposes the construction of an industrial warehouse development and related improvements (Figure 3) at the 20.2-acre project site. An existing vacant warehouse and distribution facility and a recycling center currently occupy the property, which will be demolished as part of the proposed project development. The project may also include off-site improvements. These off-site improvements include the building out of the half-width of Sinclair Street across Perris Boulevard east to Johnson Avenue (see Figure 2).

As the lead agency, the City of Perris has required the preparation of a paleontological assessment to evaluate the project’s potential to yield paleontological resources. The paleontological assessment of the project site included a review of paleontological literature and fossil locality records for a previous project in the area; a review of the underlying geology; and recommendations to mitigate impacts to potential paleontological resources, if necessary.

II. REGULATORY SETTING

The California Environmental Quality Act (CEQA), which is patterned after the National Environmental Policy Act, is the overriding regulation that sets the requirement for protecting California’s cultural and paleontological resources. CEQA does not establish specific rules that must be followed but mandates that governing permitting agencies (lead agencies) set their own guidelines for the protection of nonrenewable paleontological resources under their jurisdiction.

State of California

Under the “Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines),” as amended in December 2018 (California Code of Regulations [CCR] Title 14, Division 6, Chapter 3, Sections 15000 et seq.), procedures define the types of activities, persons, and public agencies required to comply with CEQA. Section 15063 of the State CEQA Guidelines provides a process by which a lead agency may review a project’s potential impact to the environment, whether the impacts are significant, and provide recommendations, if necessary.

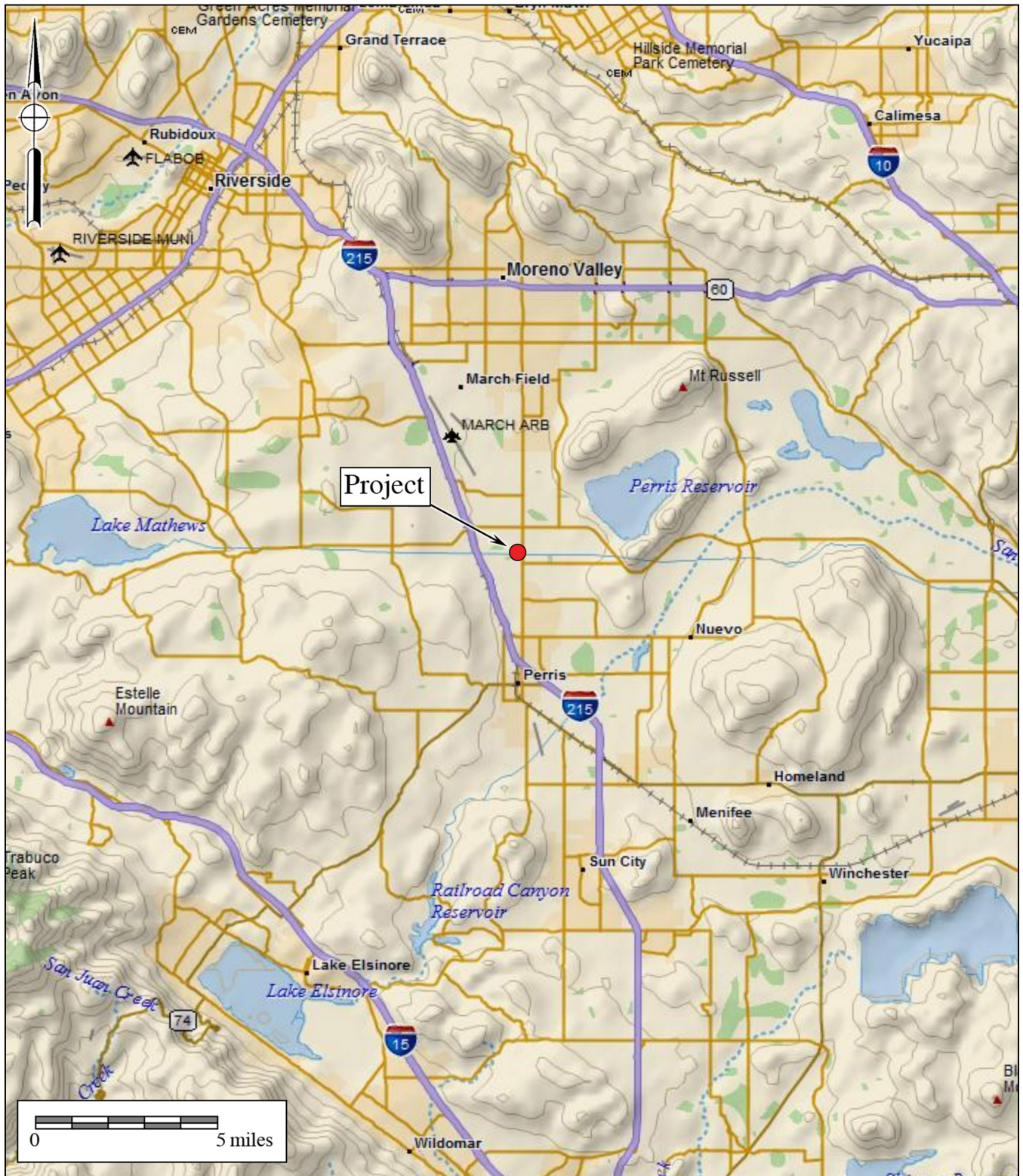


Figure 1
General Location Map

The 100 and 200 Sinclair Street Project
 DeLorme (1:250,000)



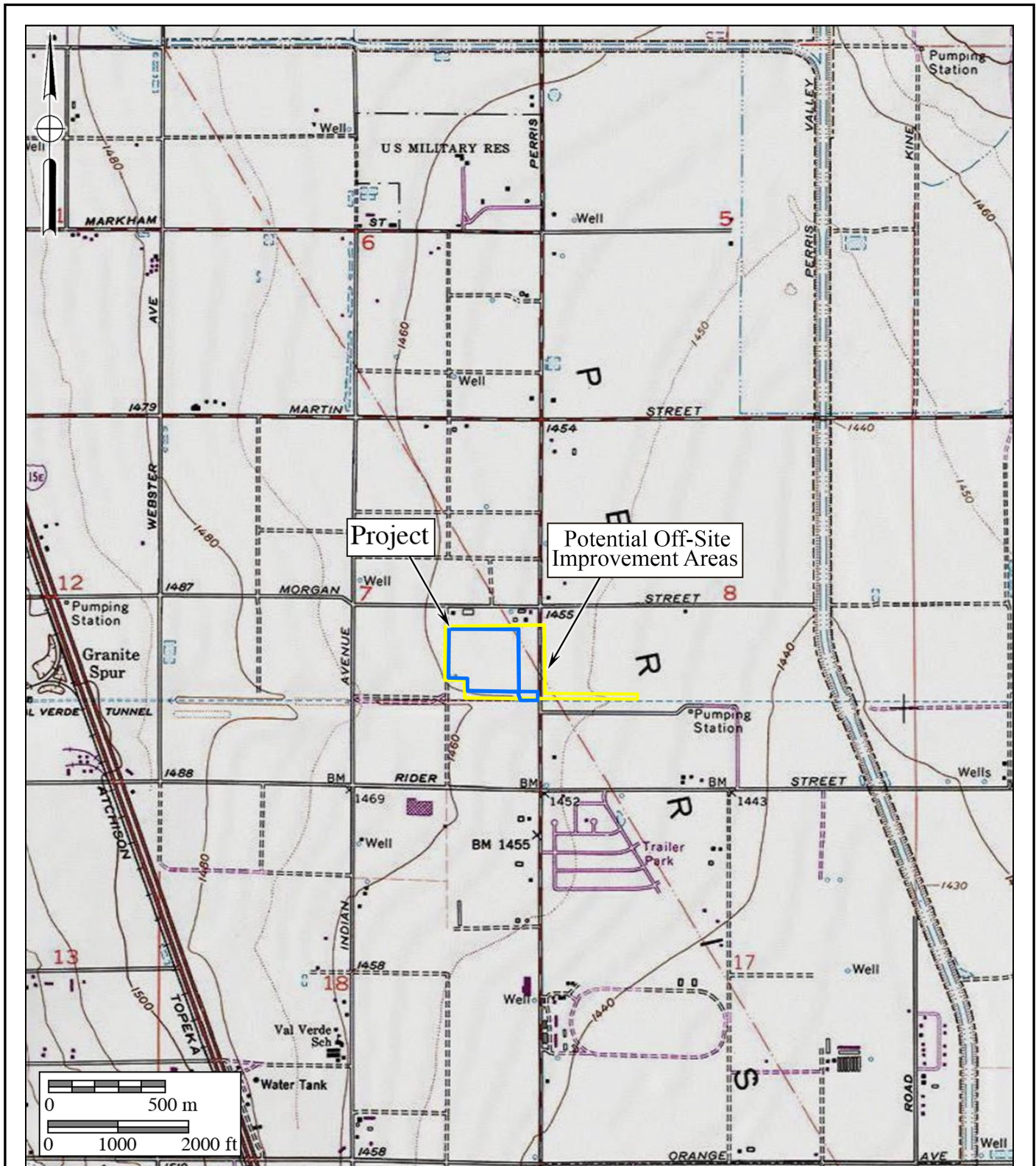


Figure 2
Project Location Map

The 100 and 200 Sinclair Street Project
 USGS Parris and Steele Peak Quadrangles (7.5-minute series)



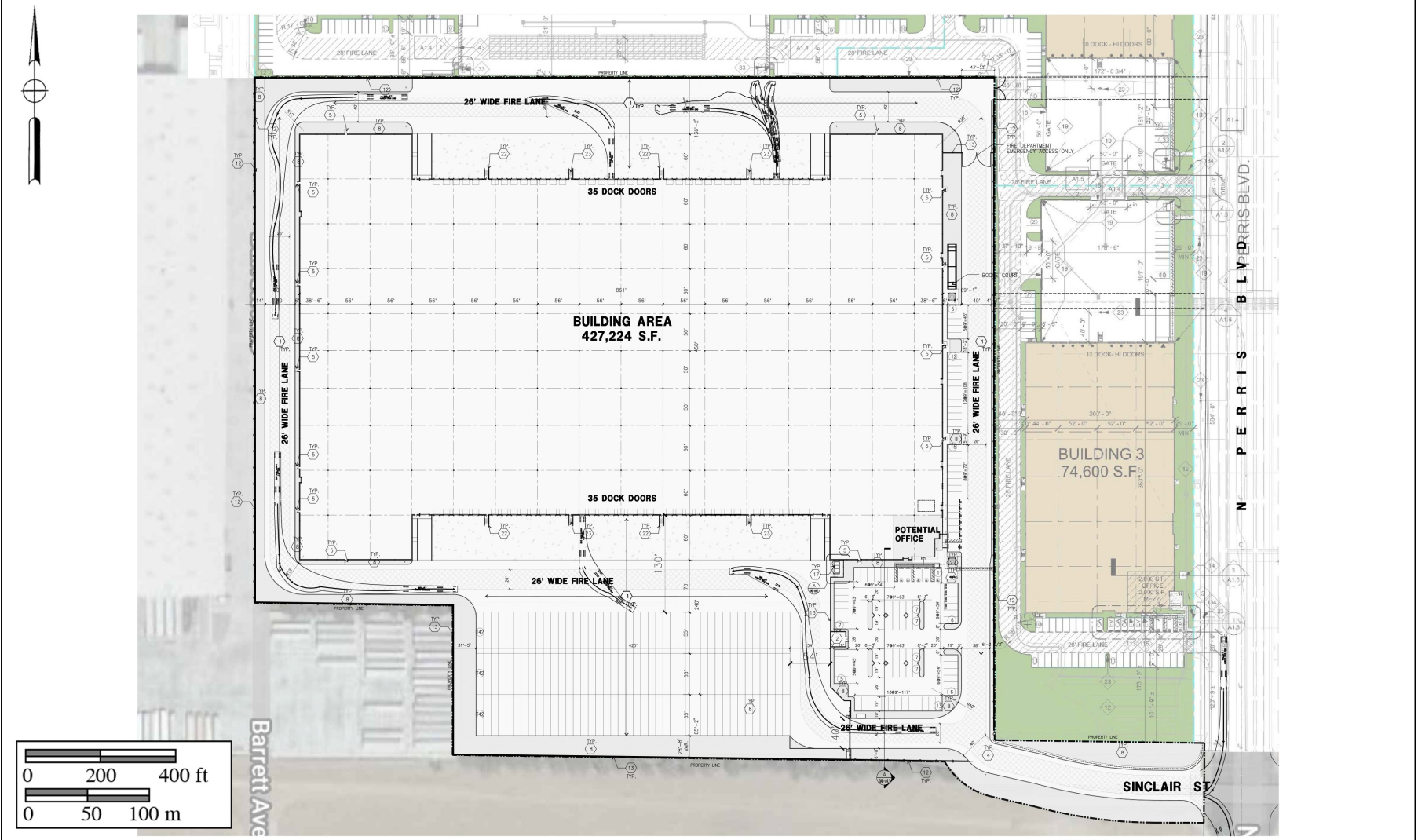
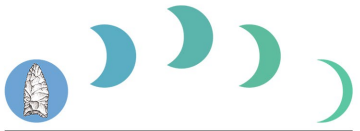


Figure 3
Site Plan

The 100 and 200 Sinclair Street Project



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In the State CEQA Guidelines Environmental Checklist Form, one of the questions to answer is, “Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?” (Appendix G, Section VII, Part f). This is to ensure compliance with California Public Resources Code Section 5097.5, the law that protects nonrenewable resources including fossils:

- a) A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands.
- b) As used in this section, “public lands” means lands owned by, or under the jurisdiction of, the state, or any city, county, district, authority, or public corporation, or any agency thereof.
- c) A violation of this section is a misdemeanor.

City of Perris

The City of Perris has allocated requirements addressing paleontological resources in the Conservation Element of the City’s General Plan (City of Perris 2005:26–27 [Exhibit CN-7]). The Conservation Element “provides goals and policies as a framework for the management, preservation, and use of the City’s resources” (City of Perris 2005). Goals, policies, and implementation measures specific to paleontological resources are as follows:

Measure IV.A.4: In Area 1 and Area 2 shown on the Paleontological Sensitivity Map [Exhibit CN-7], paleontological monitoring of all projects requiring subsurface excavations will be required once any excavation begins. In Areas 4 and 5, paleontological monitoring will be required once subsurface excavations reach 5 feet in depth, with monitoring levels reduced if appropriate, at the discretion of a certified Project Paleontologist. (City of Perris 2005:47)

Based upon the Paleontological Sensitivity Map (Exhibit CN-7) in the Conservation Element of the City’s General Plan (City of Perris 2005), the project site is located within Area 1, which requires paleontological monitoring once excavation begins.

Perris Valley Commerce Center Specific Plan

The 100 and 200 West Sinclair Street Project site is located within the boundaries of the Perris Valley Commerce Center Specific Plan (PVCCSP) (Webb 2011). The environmental

impacts resulting from implementation of allowed development under the PVCCSP have been evaluated in the Perris Valley Commerce Center Specific Plan Final Environmental Impact Report (PVCCSP EIR) (State Clearinghouse [SCH] No. 2009081086), which was certified by the City of Perris in January 2012. In the PVCCSP EIR, Mitigation Measure (MM) Cultural 1 outlines the requirements for preparation of a Phase I cultural resources study (Webb 2011), which has been completed through the preparation of this assessment. PVCCSP EIR mitigation measure MM Cultural 5 would be applicable to the 100 and 200 West Sinclair Street Project should monitoring be proposed (Webb 2011). The City has subsequently modified PVCCSP EIR mitigation measure MM Cultural 5; the modified mitigation measure applicable to the project is presented below:

Prior to the issuance of grading permits, the project proponent/developer shall submit to and receive approval from the City, a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP). The PRIMMP shall include the provision for a qualified professional paleontologist (or his or her trained paleontological representative) to be on-site for any project-related excavations that exceed three (3) feet below the pre-grade surface. Selection of the paleontologist shall be subject to approval of the City of Perris Planning Manager and no grading activities shall occur at the project site or within the off-site project improvement areas until the paleontologist has been approved by the City.

Monitoring shall be restricted to undisturbed subsurface areas of older Quaternary alluvium. The approved paleontologist shall be prepared to quickly salvage fossils as they are unearthed to avoid construction delays. The paleontologist shall also remove samples of sediments which are likely to contain the remains of small fossil invertebrates and vertebrates. The paleontologist shall have the power to temporarily halt or divert grading equipment to allow for removal of abundant or large specimens.

Collected samples of sediments shall be washed to recover small invertebrate and vertebrate fossils. Recovered specimens shall be prepared so that they can be identified and permanently preserved. Specimens shall be identified and curated and placed into an accredited repository (such as the Western Science Center or the Riverside Metropolitan Museum) with permanent curation and retrievable storage.

A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered specimens. The report and inventory, when submitted to the City of Perris Planning Division, will signify completion of the program to mitigate impacts to paleontological resources.

III. GEOLOGY

According to published maps, the geology at the project site and immediate area (including the potential off-site improvement areas) indicates that the site is underlain by lower Pleistocene (approximately 1.8 million- to perhaps 200,000- to 300,000-year-old), very old, sandy, alluvial fan deposits (“Qvof_a,” shown in brown on Figure 4) (Morton 2003). These sediments are described as “... mostly well dissected, well-indurated, reddish-brown sand deposits. Commonly contains duripans and locally silcretes” (Morton 2003). According to Woodford et al. (1971), the alluvium overlying the granitic bedrock below the project site is approximately 660 feet thick.

IV. PALEONTOLOGICAL RESOURCES

Definition

Paleontological resources are the remains of prehistoric life that have been preserved in geologic strata. These remains are called fossils and include bones, shells, teeth, and plant remains (including their impressions, casts, and molds) in the sedimentary matrix, as well as trace fossils such as footprints and burrows. Fossils are considered older than 5,000 years of age (Society of Vertebrate Paleontology 2010), but may include younger remains (subfossils), for example, when viewed in the context of local extinction of the organism or habitat. Fossils are considered a nonrenewable resource under state and local guidelines (see Section II of this report).

Fossil Locality Search

A paleontological literature review and collections and locality records search was performed by the Western Science Center (WSC) for the nearby Ramona Webster Project, located less than a mile northwest of the current project site (Radford 2021, attached). The record search indicated that the WSC has no fossil localities within the project site boundaries or within one mile of the Ramona Webster Project. Therefore, no fossil localities are mapped within the 100 and 200 West Sinclair Street Project site boundaries or within the potential off-site improvement areas. However, Pleistocene-aged sedimentary deposits within Riverside County, such as those mapped within the subject property, are considered to be of high paleontological sensitivity. The fossil bones of Pleistocene-aged mammals have been recovered from similar deposits in the region. In the record search letter, Radford (2021) concluded:

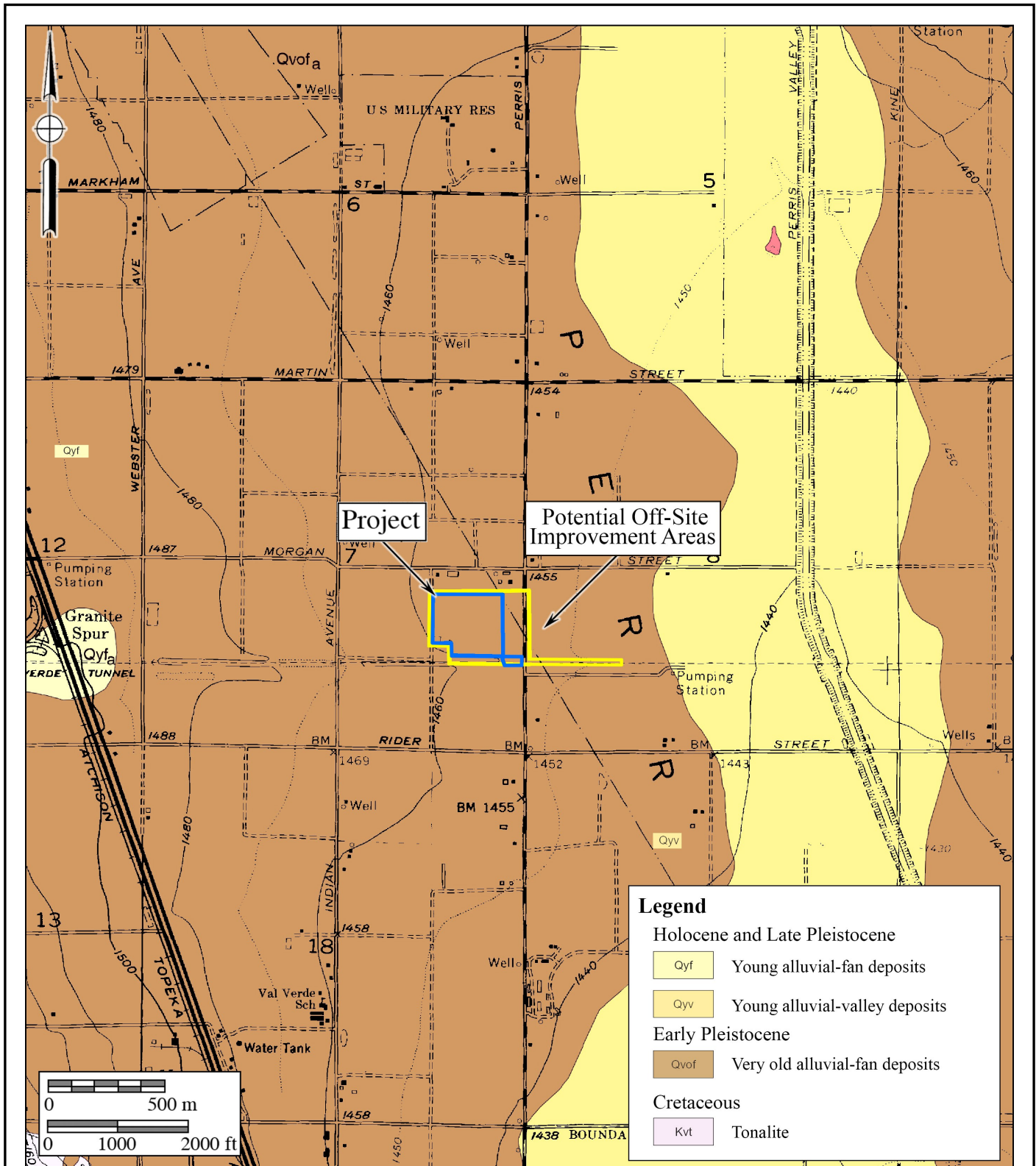


Figure 4
Geologic Map

The 100 and 200 West Sinclair Street Project
Geology after Morton (2001 and 2003)



Any fossils recovered from the Ramona Webster Project area would be scientifically significant. Excavation activity associated with development of the area has the potential to impact the paleontologically sensitive Pleistocene alluvial units and it is the recommendation of the Western Science Center that a paleontological resource mitigation plan be put in place to monitor, salvage, and curate any recovered fossils associated with the current study area. (Radford 2021)

Field Reconnaissance

The pedestrian surveys of the subject property and potential off-site improvement areas were performed by BFSAs staff on February 14 and July 13, 2022. Aerial photographs, maps, and a compass permitted orientation and location of project boundaries. Where possible, narrow transect paths were employed to ensure maximum lot coverage. All exposed ground was inspected for paleontological resources. A survey form, field notes, and photographs documented the survey work undertaken.

The surveys of the property were constrained by the existing structures and parking lots, which left little ground surface available to inspect. Furthermore, at the time of the current surveys, some areas of the property were fenced off and inaccessible; however, visual inspection of these areas indicated that they were also fully developed. The potential off-site improvement areas consisted of recently mowed open fields, with visibility in these areas ranging from good to excellent, and the paved alignments of West Sinclair Street, Barrett Avenue, and North Perris Boulevard. Barrett Avenue, located to the west of the subject property, is currently being used by an existing warehouse development to the west of the project and was inaccessible at the time of the surveys. No fossils were discovered on the property during the field surveys. This is not surprising, since fossils are not usually found on the surface of flat-lying alluvial plains.

V. PALEONTOLOGICAL SENSITIVITY

Overview

The degree of paleontological sensitivity of any particular area is based on a number of factors, including the documented presence of fossiliferous resources on a site or in nearby areas, the presence of documented fossils within a particular geologic formation or lithostratigraphic unit, and whether or not the original depositional environment of the sediments is one that might have been conducive to the accumulation of organic remains that might have become fossilized over time. Holocene alluvium is generally considered to be geologically too young to contain significant nonrenewable paleontological resources (*i.e.*, fossils), and is therefore typically assigned a low paleontological sensitivity. However, Pleistocene (greater than 11,700 years old) alluvial and alluvial fan deposits in the Inland Empire, however, often yield important Ice Age terrestrial vertebrate fossils, such as extinct mammoths, mastodons, giant ground sloths, extinct

species of horse, bison, camel, saber-toothed cats, and others (Jefferson 1991). Therefore, these Pleistocene sediments are accorded a High paleontological resource sensitivity.

Professional Standard

The Society of Vertebrate Paleontology has drafted guidelines that include four categories of paleontological sensitivity for geologic units (formations) that might be impacted by a proposed project, as listed below:

- *High Potential:* Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered.
- *Undetermined Potential:* Rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment, and that further study is needed to determine the potential of the rock unit.
- *Low Potential:* Rock units that are poorly represented by fossil specimens in institutional collections or based on a general scientific consensus that only preserve fossils in rare circumstances.
- *No Potential:* Rock units that have no potential to contain significant paleontological resources, such as high-grade metamorphic rocks and plutonic igneous rocks.

Using these criteria, based on the Pleistocene age of the sediments mapped at the project and fossil localities found in similar deposits such as those at the project, the very old alluvial fan deposits can be considered to have an undetermined to high potential to yield significant paleontological resources.

City of Perris Paleontological Sensitivity Assessment

The project site is located within the area covered by the PVCCSP and it is subject to the mitigation measure guidelines specified within The PVCCSP EIR. PVCCSP EIR mitigation measure MM Cultural 5 (Webb 2011) requires the monitoring of paleontological resources for excavations exceeding five feet deep in subsurface areas of undisturbed older alluvium. However, the Paleontological Sensitivity Map in the Conservation Element of the City’s Comprehensive General Plan (City of Perris 2005 [Exhibit CN-7]) shows that the 100 and 200 West Sinclair Street Project site is located within Area 1, which is assigned a high paleontological sensitivity, based on the presence of the Pleistocene older valley deposits mapped at the surface. Sites located within Area 1 require that paleontological monitoring be once any excavation begins (City of Perris 2005 [Goal IV.A.4]).

VI. CONCLUSIONS AND RECOMMENDATIONS

Research has confirmed the existence of potentially fossiliferous lower Pleistocene very old alluvial fan deposits (“Qvof_a” on Figure 4) at the project site and the occurrence of terrestrial vertebrate fossils at shallow depths from Pleistocene older alluvial fan sediments across the Inland Empire of western Riverside County has been documented. The “High” paleontological sensitivity typically assigned to Pleistocene alluvial fan sediments for yielding paleontological resources supports the recommendation that paleontological monitoring be required during mass grading, trenching, and excavation activities in undisturbed Pleistocene alluvial fan sediments in order to mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources.

Full-time monitoring is required during earth disturbance activities, as required by the City of Perris (City of Perris 2005). A suggested paleontological resource impact mitigation monitoring program (PRIMMP) is detailed below. When implemented with the provisions of CEQA, and the guidelines of the Society of Vertebrate Paleontology (2010), this PRIMMP would mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources (fossils), if present, to a less than significant level.

Suggested PRIMMP

The following guidelines, outlined below, are based on the findings stated above. Paleontological monitoring may be reduced upon the observations and recommendations of the professional-level project paleontologist. The following PRIMMP, when implemented, would reduce potential impacts of paleontological resources to a less than significant level:

1. Monitoring of mass grading and excavation activities in areas identified as likely to contain paleontological resources shall be performed by a qualified paleontologist or paleontological monitor. Full-time monitoring for paleontological resources will be conducted in areas where grading, excavation, or drilling activities occur in order to mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources. Monitoring of artificial fill and disturbed soils is not warranted.
2. Paleontological monitors will be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow for the removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if they are present, are determined upon exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.

3. Preparation of recovered specimens to a point of identification and permanent preservation will be conducted, including screen-washing sediments to recover small vertebrates and invertebrates if indicated by the results of test sampling. Preparation of any individual vertebrate fossils is often more time-consuming than for accumulations of invertebrate fossils.
4. All fossils must be deposited in an accredited institution (university or museum) that maintains collections of paleontological materials. The WSC in Hemet, California, is the preferred institution by the County of Riverside and the PVCCSP. All costs of the paleontological monitoring and mitigation program, including any one-time charges by the receiving institution, are the responsibility of the developer.
5. Preparation of a final monitoring and mitigation report of findings and significance will be completed, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location(s). A letter documenting receipt and acceptance of all fossil collections by the receiving institution must be included in the final report. The report, when submitted to and accepted by the appropriate lead agency (e.g., the City of Perris), will signify satisfactory completion of the project program to mitigate impacts to any nonrenewable paleontological resources.

VII. CERTIFICATION

I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this paleontological report, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief, and have been compiled in accordance with CEQA criteria.



June 12, 2023; Revised November 15, 2023

Todd A. Wirths
Senior Paleontologist
California Professional Geologist No. 7588

Date

VIII. REFERENCES CITED

Albert A. Webb Associates. 2011. Perris Valley Commerce Center Specific Plan Final Environmental Impact Report (SCH No. 2009081086). City of Perris. Electronic document, http://www.cityofperris.org/city-hall/specific-plans/PVCC/PVCC_MMRP_11-30%2011_rev.pdf, accessed February 7, 2022.

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- Morton, D.M. 2003. Preliminary geologic map of the Perris 7.5' quadrangle, Riverside County, California: U.S. Geological Survey Open-File Report 03-270, scale 1:24,000.
- Radford, D. 2021. Untitled letter regarding paleontological resources near the Ramona Webster Project, for Brian F. Smith and Associates, Inc., Poway, California, by the Western Science Center, Hemet, California. (attached)
- Society of Vertebrate Paleontology. 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources; by the SVP Impact Mitigation Guidelines Revision Committee. Electronic document, http://vertpaleo.org/Membership/Member-Ethics/SVP_Impact_Mitigation_Guidelines.aspx, accessed February 7, 2022.
- Woodford, A.O., Shelton, J.S., Doehring, D.O., and Morton, R.K. 1971. Pliocene-Pleistocene history of the Perris Block, southern California. Geological Society of America Bulletin, v. 82, p. 3421–3448, 18 figs.

APPENDIX A

Qualifications of Key Personnel

Todd A. Wirths, MS, PG No. 7588

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Education

Master of Science, Geological Sciences, San Diego State University, California **1995**

Bachelor of Arts, Earth Sciences, University of California, Santa Cruz **1992**

Professional Certifications

California Professional Geologist #7588, 2003

Riverside County Approved Paleontologist

San Diego County Qualified Paleontologist

Orange County Certified Paleontologist

OSHA HAZWOPER 40-hour trained; current 8-hour annual refresher

Professional Memberships

Board member, San Diego Geological Society

San Diego Association of Geologists; past President (2012) and Vice President (2011)

South Coast Geological Society

Southern California Paleontological Society

Experience

Mr. Wirths has more than a dozen years of professional experience as a senior-level paleontologist throughout southern California. He is also a certified California Professional Geologist. At BFSAE nvironmental Services, Mr. Wirths conducts on-site paleontological monitoring, trains and supervises junior staff, and performs all research and reporting duties for locations throughout Los Angeles, Ventura, San Bernardino, Riverside, Orange, San Diego, and Imperial Counties. Mr. Wirths was formerly a senior project manager conducting environmental investigations and remediation projects for petroleum hydrocarbon-impacted sites across southern California.

Selected Recent Reports

2019 *Paleontological Assessment for the 10575 Foothill Boulevard Project, City of Rancho Cucamonga, San Bernardino County, California.* Prepared for T&B Planning, Inc. Report on file at Brian F. Smith and Associates, Inc., Poway, California.

2019 *Paleontological Assessment for the MorningStar Marguerite Project, Mission Viejo, Orange County, California.* Prepared for T&B Planning. Report on file at Brian F. Smith and Associates, Inc., Poway, California.

- 2019 *Paleontological Monitoring Report for the Nimitz Crossing Project, City of San Diego.* Prepared for Voltaire 24, LP. Report on file at Brian F. Smith and Associates, Inc., Poway, California.
- 2019 *Paleontological Resource Impact Mitigation Program (PRIMP) for the Jack Rabbit Trail Logistics Center Project, City of Beaumont, Riverside County, California.* Prepared for JRT BP 1, LLC. Report on file at Brian F. Smith and Associates, Inc., Poway, California.
- 2020 *Paleontological Monitoring Report for the Oceanside Beachfront Resort Project, Oceanside, San California.* Prepared for S.D. Malkin Properties. Report on file at Brian F. Smith and Associates, Inc., Poway, California.
- 2020 *Paleontological Resource Impact Mitigation Program for the Nakase Project, Lake Forest, Orange County, San California.* Prepared for Glenn Lukos Associates, Inc. Report on file at Brian F. Smith and Associates, Inc., Poway, California.
- 2020 *Paleontological Resource Impact Mitigation Program for the Sunset Crossroads Project, Banning, Riverside County.* Prepared for NP Banning Industrial, LLC. Report on file at Brian F. Smith and Associates, Inc., Poway, California.
- 2020 *Paleontological Assessment for the Ortega Plaza Project, Lake Elsinore, Riverside County.* Prepared for Empire Design Group. Report on file at Brian F. Smith and Associates, Inc., Poway, California.
- 2020 *Paleontological Resource Record Search Update for the Green River Ranch III Project, Green River Ranch Specific Plan SP00-001, City of Corona, California.* Prepared for Western Realco. Report on file at Brian F. Smith and Associates, Inc., Poway, California.
- 2020 *Paleontological Assessment for the Cypress/Slover Industrial Center Project, City of Fontana, San Bernardino County, California.* Prepared for T&B Planning, Inc. Report on file at Brian F. Smith and Associates, Inc., Poway, California.
- 2020 *Paleontological Monitoring Report for the Imperial Landfill Expansion Project (Phase VI, Segment C-2), Imperial County, California.* Prepared for Republic Services, Inc. Report on file at Brian F. Smith and Associates, Inc., Poway, California.
- 2021 *Paleontological Assessment for the Manitou Court Logistics Center Project, City of Jurupa Valley, Riverside County, California.* Prepared for Link Industrial. Report on file at Brian F. Smith and Associates, Inc., Poway, California.
- 2021 *Paleontological Resource Impact Mitigation Program for the Del Oro (Tract 36852) Project, Menifee, Riverside County.* Prepared for D.R. Horton. Report on file at Brian F. Smith and Associates, Inc., Poway, California.
- 2021 *Paleontological Assessment for the Alessandro Corporate Center Project (Planning Case PR-2020-000519), City of Riverside, Riverside County, California.* Prepared for OZI Alessandro, LLC. Report on file at Brian F. Smith and Associates, Inc., Poway, California.
- 2021 *Paleontological Monitoring Report for the Boardwalk Project, La Jolla, City of San Diego.* Prepared for Project Management Advisors, Inc. Report on file at Brian F. Smith and Associates, Inc., Poway, California.

APPENDIX B

Fossil Locality Search



May 26, 2021

Brian F. Smith and Associates
Todd Wirths
14010 Poway Road, Suite A
Poway, CA 92064

Dear Mr. Wirths,

This letter presents the results of a record search conducted for Ramona Webster Project in the city of Perris, Riverside County, California. The project site consists of 52 acres located south of Ramona Expressway, west of Webster Avenue, east of I-215 and north of Morgan Avenue in Section 12, Township 4 South and Range 4 West on the *Perris, CA* USGS 7.5 minute topographic quadrangle.

The geologic unit underlying the project area is mapped entirely as very old alluvial fan deposits dating to the early Pleistocene epoch (Morton, Bovard & Alvarez, 2003). Pleistocene alluvial units are considered to be of high paleontological sensitivity. The Western Science Center does not have localities within the project area or a one mile radius, but does have numerous localities within similarly mapped alluvial sediments throughout the region. Pleistocene alluvial deposits in southern California are well documented and known to contain abundant fossil resources including those associated with Columbian mammoth (*Mammuthus columbi*), Pacific mastodon (*Mammut pacificus*), Sabertooth cat (*Smilodon fatalis*), Ancient horse (*Equus sp.*) and many other Pleistocene megafauna.

Any fossils recovered from the Ramona Webster Project area would be scientifically significant. Excavation activity associated with development of the area has the potential to impact the paleontologically sensitive Pleistocene alluvial units and it is the recommendation of the Western Science Center that a paleontological resource mitigation plan be put in place to monitor, salvage, and curate any recovered fossils associated with the current study area.

If you have any questions, or would like further information, please feel free to contact me at dradford@westerncentermuseum.org

Sincerely,

A handwritten signature in black ink, appearing to read 'Darla Radford', is written over a light blue horizontal line.

Darla Radford
Collections Manager