# PALEONTOLOGICAL ASSESSMENT FOR THE 2271-2311 AND 2341 205<sup>TH</sup> STREET PROJECT

## CITY OF TORRANCE LOS ANGELES COUNTY, CALIFORNIA

APNs 7352-018-004 and -066

#### Submitted to:

City of Torrance Community Development Department 3031 Torrance Boulevard Torrance, California 90503

### **Prepared for:**

EPD Solutions, Inc. 2355 Main Street, Suite 100 Irvine, California 92614

#### **Prepared by:**

Brian F. Smith and Associates, Inc. 14010 Poway Road, Suite A Poway, California 92064



May 12, 2022; Revised December 8, 2022

## **Paleontological Database Information**

Author: Todd A. Wirths, M.S., Senior Paleontologist, California

Professional Geologist No. 7588

**Consulting Firm:** Brian F. Smith and Associates, Inc.

14010 Poway Road, Suite A Poway, California 92064

(858) 679-8218

**Report Date:** May 12, 2022; Revised December 8, 2022

**Report Title:** Paleontological Assessment for the 2271-2311 and 2341 205<sup>th</sup>

Street Project, Torrance, Los Angeles County, California

**Prepared for:** EPD Solutions, Inc.

2355 Main Street, Suite 100 Irvine, California 92614

**Submitted to:** City of Torrance

Community Development Department

3031 Torrance Boulevard Torrance, California 90503

**Assessor's Parcel Numbers:** 7352-018-004 and -066

**USGS Quadrangle:** USGS Torrance, California 7.5-minute Quadrangle.

Study Area: 6.25 acres

**Key Words:** Paleontological assessment; Pleistocene old alluvial deposits;

Pleistocene marine deposits; High sensitivity; City of Torrance.

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## I. <u>INTRODUCTION AND LOCATION</u>

A paleontological resource assessment has been completed for the 2271-2311 and 2341 205<sup>th</sup> Street Project (Assessor's Parcel Numbers [APNs] 7352-018-004 and -066) located at 2271-2311 and 2341 205<sup>th</sup> Street in the city of Torrance, Los Angeles County, California (Figures 1 and 2). The project is located in the northwest area of the U.S. Geological Survey (USGS) 7.5-minute, 1:24,000-scale *Torrance, California* topographic quadrangle map (Figure 2). The 6.25-acre project includes a 25-dock industrial warehouse with office space totaling 126,048 square feet.

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

## II. <u>REGULATORY SETTING</u>

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 "Guidelines for Implementation of the California Environmental Quality Act," 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 CCR 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.

In CEQA's 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 by which protects nonrenewable resources including fossils, which is paraphrased below:

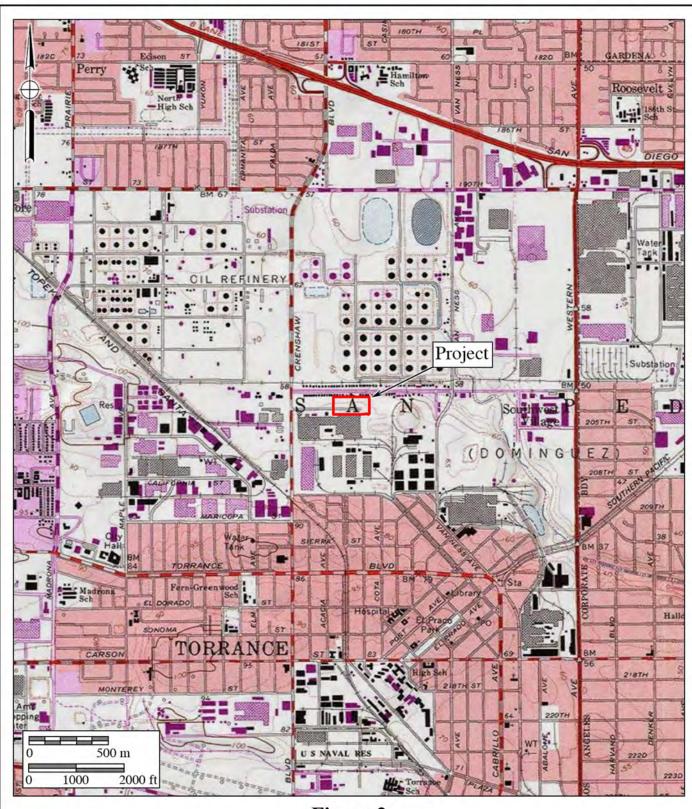




# Figure 1 General Location Map

The 2271-2311 and 2341 205th Street Project

DeLorme (1:250,000)





# Figure 2 Project Location Map

The 2271-2311 and 2341 205th Street Project

USGS Torrance Quadrangle (7.5-minute series)

- 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.

#### **County of Los Angeles**

In the Conservation and Natural Resources Element of the Los Angeles County General Plan, goals and policies are set forth for the management and preservation of paleontological resources (County of Los Angeles 2015). The following policies in Goal C/NR 14 of the element address paleontological resources (County of Los Angeles 2015, p. 167):

*Policy C/NR 14.1*: Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.

*Policy C/NR 14.2*: Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.

Policy C/NR 14.5: Promote public awareness of historic, cultural, and paleontological resources.

*Policy C/NR 14.6*: Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

#### City of Torrance

The 2009 General Plan of the City of Torrance does not discuss paleontological resources (City of Torrance 2010).

## III. GEOLOGY

The project is located within the West Coast Basin of the larger Los Angeles Basin, a large structural sedimentary basin bounded by active fault systems within the Los Angeles metropolitan area (Hillhouse et al. 2002). The project area is underlain by late to middle Pleistocene old alluvium (amber area labeled as "Qoa" on Figure 3; after Saucedo et al. 2016). Saucedo et al. (2016) describe these deposits as fluvial sediments deposited on canyon floors, consisting of consolidated, poorly sorted, permeable, commonly slightly dissected gravel, sand,

silt, and clay-bearing alluvium. In the *Torrance* Quadrangle, the unit includes stream terrace deposits.

Below the surface, the Pleistocene deposits mapped by Saucedo et al. (2016) and Dibblee et al. (1999) in the area of the 2271-2311 and 2341 205<sup>th</sup> Street Project may be correlative, in part, to the Palos Verdes Sand, the San Pedro Sand, and/or the Timms Point Silt (Kennedy 1975; Bell 2021, in Appendix B). All are known to be fossiliferous, yielding abundant molluscan and vertebrate faunas (Kennedy 1975; Langenwalter 1975).

## IV. PALEONTOLOGICAL RESOURCES

#### **Definition**

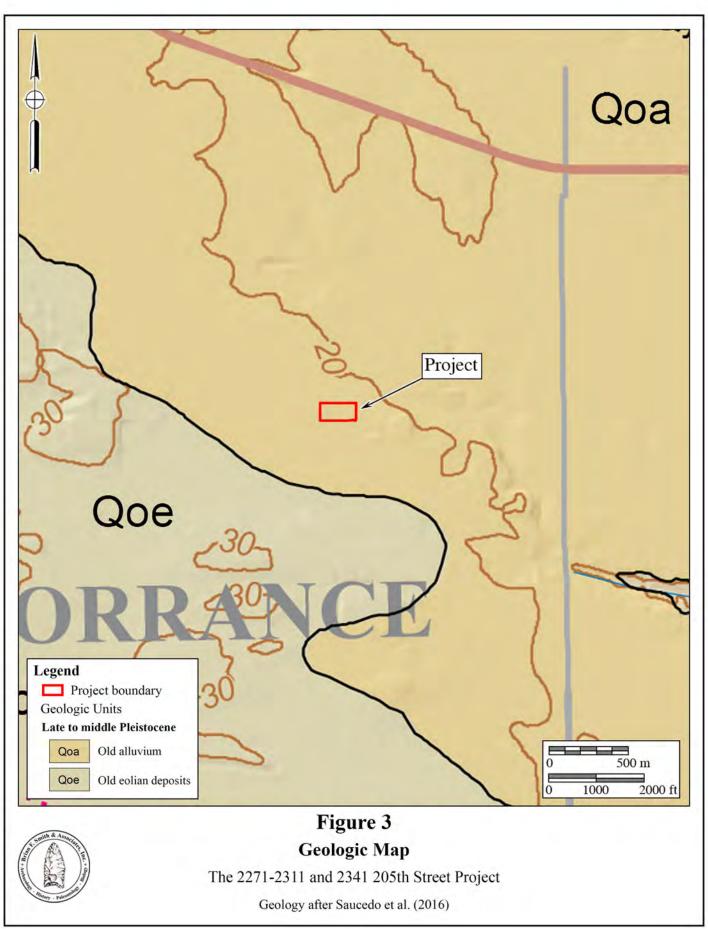
Paleontological resources are the remains of prehistoric life that have been preserved in geologic strata. These remains are called fossils and include bones, shells, teeth, and plant remains (including their impressions, casts, and molds) in the sedimentary matrix, as well as trace fossils such as footprints and burrows. Fossils are considered older than 5,000 years of age (Society of Vertebrate Paleontology [SVP] 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, above).

#### Fossil Locality Search

A prior paleontological records search was performed for the nearby Prologis Port Logistics 7 Project by Dr. Alyssa Bell of the Vertebrate Paleontology Section of the Natural History Museum of Los Angeles County (LACM; Bell 2021, in Appendix B). The Prologis Port Logistics 7 Project is located less than one mile west of the current project. The report by Bell (2021) did not identify any record of fossils found at the subject property, and none were identified within a radius of one mile of the Prologis Port Logistics 7 Project. However, two Pleistocene-aged invertebrate fossil localities were reported in the vicinity of the 2271-2311 and 2341 205<sup>th</sup> Street Project. LACM locality (loc.) 237, located near the intersection of Crenshaw Boulevard and 190<sup>th</sup> Street, is less than one mile north of the current project, and LACM loc. 21125, near the intersection of Western Avenue and Torrance Boulevard, is also less than one mile to the southeast. No other information is given, but presumably the collections consist of marine molluscan fossils.

The potentially closest known fossil locality, LACM loc. 4444, is reported by Jefferson (1991), consisting of the remains of extinct horse, *Equus* sp. This fossil locality is situated at the petroleum refinery in Torrance, accessed from 190<sup>th</sup> Street, just north of the project across Del Amo Boulevard. No other data is provided.

Beyond the *Equus* locality and the three invertebrate localities, there are five known vertebrate localities beyond two miles distant from the current project, all Pleistocene in age.



They are listed below, with taxa found:

- LACM loc. 5096, approximately two-and-a-half miles northwest: invertebrates (Bell 2021)
- LACM loc. 1254, approximately four miles west, at the Redondo Beach energy generating plant, from 27 to 30 feet deep: llama (*Hemiauchenia* sp.) and Cetecea (Miller 1971; Jefferson 1991)
- LACM loc. 1839, approximately two-and-a-half miles south, Crenshaw Boulevard and 236<sup>th</sup> Street, about 35 feet deep: horse tooth (*Equus* sp.) (Miller 1971; Jefferson 1991)
- LACM loc. 65118, approximately four miles south, Crenshaw Boulevard at Pacific Coast Hwy: Cetecea (Jefferson 1991)
- LACM loc. 3823, approximately four miles southeast, at the southeast corner of Figueroa Street and Sepulveda Boulevard, about 12 to 14 feet deep: Camelidae (Bell 2021)
- LACM loc. 3085, approximately five miles southeast, at Lomita Boulevard and Main Street: shark, ray, Odontoceti/Delphinidae, and mollusks (Bell 2021, Jefferson 1991, Langenwalter 1975)

In the LACM records search letter, Bell (2021, Appendix B) indicates, "Potentially fossil-bearing units are present in the project area, either at the surface or in the subsurface. As such, NHMLA [Natural History Museum of Los Angeles] recommends that a full paleontological assessment of the project area be conducted by a paleontologist meeting Bureau of Land Management or Society of Vertebrate Paleontology standards."

#### **Project Survey**

On April 26, 2022, BFSA staff, under the supervision of Principal Investigator Todd A. Wirths, conducted an intuitive review of the property to determine if any paleontological resources were visible. The field methodology employed for the project included walking evenly spaced survey transects set approximately five to 10 meters apart while visually inspecting the ground surface, however, buildings limited the ability to maintain uninterrupted transects. Visibility of the natural ground surface was poor throughout the property due to the current development of the property. All potentially sensitive areas where paleontological resources might be located were closely inspected. No bedrock outcrops were exposed that might indicate the presence of fossils. No paleontological resources, or evidence of paleontological resources, were observed during the survey.

## 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 Los Angeles Basin can yield important Ice Age terrestrial vertebrate fossils, such as extinct mammoths, mastodons, giant ground sloths, extinct species of horse, bison, and camel, saber-toothed cats, and others (Miller 1971; Jefferson 1991). Therefore, these Pleistocene sediments are accorded a High paleontological resource sensitivity.

#### **Professional Standard**

The SVP (2010) 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.
- <u>Undetermined Potential</u>: 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.
- <u>Low Potential</u>: 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 age of the geologic formation mapped at the project and the fossil record of the formation, the old alluvial deposits at the project may be assigned a high potential to yield significant paleontological resources.

#### **Analysis**

Based on the limited data provided in Miller (1971), Langenwalter (1975), Jefferson (1991), and Bell (2021), and the local geology outlined in Kennedy (1975) and Langenwalter (1975), most of the fossil localities reported herein were likely recovered from subsurface marine

deposits, or, when additional data is provided, somewhat deep, potentially non-marine deposits (e.g., LACM locs. 1839 and 3823), indicating that the surficial old alluvial deposits overlie locally fossil-bearing, Pleistocene marine to perhaps marginal marine deposits.

## VI. CONCLUSIONS AND RECOMMENDATIONS

Research has confirmed the existence of potentially fossiliferous Pleistocene marine deposits beneath the 2271-2311 and 2341 205th Street Project, along with the High paleontological resource sensitivity accorded to these sediments locally (Bell 2021), and the presence of several previously recorded fossil specimens from Pleistocene marine deposits within five miles of the subject property (Miller 1971; Jefferson 1991; Bell 2021) all support the recommendation that full-time paleontological monitoring be required in these Pleistocene marine deposits. It is recommended that periodic "spot checks" be performed by a qualified paleontologist during grading, excavation, or utility trenching activities at the project, starting at the surface, to determine the stratigraphic relationships of the sediments underlying the site, and for the potential presence of fossils. Periodic "spot check" monitoring will consist of approximately three to four scheduled site visits per week by a paleontological monitor during construction ground disturbance. Once a depth of five feet is achieved during excavation, drilling, or trenching activities, or if fossils are discovered at shallower depths, full-time monitoring for paleontological resources is warranted.

A Paleontological Resource Impact Mitigation Program (PRIMP) is recommended prior to approval of the grading permit. A suggested PRIMP is outlined below. When implemented with the provisions of CEQA and the guidelines of the SVP (2010), this PRIMP would mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources (fossils), if present, to a level below significant.

- 1. Monitoring of mass grading and excavation activities shall be performed by a qualified paleontologist or paleontological monitor. Periodic spot checks should be performed from the surface to a depth of five feet to determine the potential presence of Pleistocene strata or fossils. Once Pleistocene strata are recognized or fossils are discovered, or excavation depths proceed beyond five feet deep, full-time monitoring for paleontological resources is warranted. Monitoring will be conducted in areas where grading, excavation, or drilling activities occur at five feet or deeper 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. The monitor shall notify the project paleontologist, who will then notify the concerned parties of the discovery. 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, such as the LACM) that maintains collections of paleontological materials. 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 Torrance), 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.

Todd A. Wirths

Senior Paleontologist

California Professional Geologist No. 7588

## VIII. <u>REFERENCES</u>

Bell, A. 2021. re: Paleontological resources for the Prologis Port Logistics 7 Project, project no. 20-225. Unpublished letter to Brian F. Smith and Associates, Poway, California, by

- Research & Collections, Los Angeles County Natural History Museum, Los Angeles, California. (attached)
- City of Torrance. 2010. City of Torrance General Plan 2009. https://www.torranceca.gov/our-city/community-development/general-plan.
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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: https://vertpaleo.org/wp-content/uploads/2021/01/SVP\_Impact\_Mitigation\_Guidelines-1.pdf.

# APPENDIX A

**Qualifications of Key Personnel** 

# Todd A. Wirths, MS, PG No. 7588

## Senior Paleontologist

Brian F. Smith and Associates, Inc. 14010 Poway Road • Suite A •

Phone: (858) 679-8218 • Fax: (858) 679-9896 • E-Mail: twirths@bfsa-ca.com



### 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 BFSA, 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 hydrocarbonimpacted 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** 



Natural History Museum of Los Angeles County 900 Exposition Boulevard Los Angeles, CA 90007 tel 213.763.DINO

tel 213.763.DINO www.nhm.org

Research & Collections

e-mail: paleorecords@nhm.org

January 8, 2021

Brian F. Smith and Associates, Inc.

Attn: Todd Wirths

re: Paleontological resources for the Del Amo and Madrona Avenue Project, project no. 20-225

#### Dear Todd:

I have conducted a thorough search of our paleontology collection records for the locality and specimen data for proposed development at the Del Amo and Madrona Avenue project area as outlined on the portion of the Torrance USGS topographic quadrangle map that you sent to me via e-mail on January 8, 2020. We do not have any fossil localities that lie directly within the proposed project area, but we do have fossil localities nearby from the same sedimentary deposits that occur in the proposed project area, either at the surface or at depth.

The following table shows the closest known localities in the collection of the Natural History Museum of Los Angeles County.

| Locality     |                    |                    |                                |              |
|--------------|--------------------|--------------------|--------------------------------|--------------|
| Number       | Location           | Formation          | Таха                           | Depth        |
|              |                    | Unknown            |                                |              |
|              | near Crenshaw Blvd | formation          |                                |              |
| LACM IP 237  | and 190th Street   | (Pleistocene)      | Invertebrates                  | Unknown      |
|              | 4848 W. 190th      |                    |                                |              |
| LACM IP 5096 | Street, Torrance   | Timms Point Silt   | Invertebrates                  | Unknown      |
|              | Just N of the      |                    |                                |              |
|              | intersection of    | Unknown            |                                |              |
| LACM IP      | Western Ave &      | formation          |                                |              |
| 21125        | Torrance Blvd      | (Pleistocene)      | Invertebrates                  | Unrecorded   |
|              |                    | Unidentified       |                                |              |
|              | SE corner of       | (Pleistocene; grey |                                |              |
|              | Figueroa St &      | buff arenaceous    |                                |              |
| LACM VP 3823 | Sepulveda Blvd     | silt)              | Camel family (Camelidae)       | 12-14 ft bgs |
|              |                    |                    | Fish (Condrichthyes); Rays     | Unrecorded   |
|              | intersection of    |                    | (Myliobatoidea); Toothed whale | (collected   |
|              | Lomita Blvd & Main |                    | (Odontoceti); Invertebrates    | during       |
| LACM VP 3085 | St                 | Palos Verdes Sand  | (Mollusca)                     | excavations  |

VP, Vertebrate Paleontology; IP, Invertebrate Paleontology; bgs, below ground surface

This records search covers only the records of the Natural History Museum of Los Angeles County ("NHMLA"). It is not intended as a paleontological assessment of the project area for the purposes of CEQA or NEPA. Potentially fossil-bearing units are present in the project area, either at the surface or in the subsurface. As such, NHMLA recommends that a full paleontological assessment of the project area be conducted by a paleontologist meeting Bureau of Land Management or Society of Vertebrate Paleontology standards.

Sincerely,

Alyssa Bell, Ph.D.

alyssa Bell

Natural History Museum of Los Angeles County

enclosure: invoice