



6 December 2018

Ms. Connie Anderson
T&B Planning, Inc.
17542 East 17th Street, Suite 100
Tustin, California 92780

Subject: Paleontological Resource and Mitigation Monitoring Assessment, Seaton Commerce Center project, west of Perris in unincorporated Riverside County, California (PPT180025, CEQ180101; GEO180039)

Dear Ms. Anderson:

Introduction and Site Location: A paleontological resource and mitigation monitoring assessment has been completed for the Seaton Commerce Center project (PPT180025, CEQ180101; GEO180039) west of Perris and the I-215 corridor in unincorporated Riverside County, California (Attachments 1 and 2). The 10.7-acre property is located on the southeast corner of Perry Street and Seaton Avenue. The site is currently vacant, as are the properties to the immediate north and east. To the west is a mix of rural residential properties, and to the south, commercial or light industrial operations. On the U. S. Geological Survey 7.5-minute Steele Peak, California topographic quadrangle map, the site is located in the southwest quarter of the southwest quarter of Section 1, Township 4 South, Range 4 West, San Bernardino Base and Meridian (Attachment 2). The project seeks to develop the property into a warehouse and multi-tenant industrial structure with associated parking, infrastructure, and landscaping. The project will also include approximately 1.4 acres of off-site road improvements.

Geology: The geology of the project site and immediate area is shown on Attachment 3 (after D. M. Morton, 2001, Geologic map of the Steele Peak 7.5' quadrangle, Riverside County, California: U. S. Geological Survey Open-File Report 01-449, scale 1:24,000, and on the adjacent Perris 7.5' quadrangle [D. M. Morton, 2003]). The map of the area shows that the project is underlain by lower Pleistocene (approximately 1.8 million to perhaps 200,000 to 300,000 year old) very old alluvial fan deposits (Qvof_a, shown in light brown on Attachment 3) that lap onto granitic exposures of the Cretaceous Val Verde Tonalite (Kvt on Attachment 3) along the west side of the project. Geomorphically, there is a very gentle slope to the east toward Perris Valley.

Paleontological Sensitivity: A paleontological sensitivity map generated by the Riverside County Land Information System in November 2018 (Attachment 4) ranks most of the project area as having a High Potential/Sensitivity (High B), which is “based on [the

presence of] geologic formations or mappable rock units that contain fossilized body elements, and trace fossils such as tracks, nests and eggs. These fossils occur on or below the surface.” The category “High B” indicates that fossils are likely to be encountered at or below a depth of four feet, and may be impacted by excavation work during construction-related activities. Very old alluvial fan sediments with a High Potential/Sensitivity (High B) to yield nonrenewable paleontological resources (*i.e.*, fossils) are shown in amber tint on Attachment 4. The western part of the project, which is composed of Cretaceous granitic rocks, is ranked as having a Low Paleontological Potential/Sensitivity. Fossils are never found in granitic rocks, which are formed by cooling magma miles below the Earth’s surface, and thus do not have any paleontological resource potential or sensitivity.

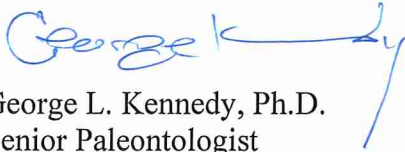
Records Search Results: A paleontological literature review and collections and records search report of a nearby area (Stratford Ranch), approximately 1.5 miles to the east of the Seaton Commerce Center project site (on the east side of Perris Boulevard and the north side of Ramona Expressway) was previously prepared by the Geological Sciences Division of the San Bernardino County Museum (SBCM) in Redlands, California (E. G. Scott, 2005, attached) and is used in this evaluation. The report did not record any previously located fossil localities within the project area, nor within a one-mile radius in any direction. The records search report regarded the older Pleistocene alluvial fan deposits (Qvof_a on Attachment 3) as having a high potential to contain significant nonrenewable paleontological resources (*i.e.*, fossils), and the project area was assigned a “high paleontological resource sensitivity” (Scott, 2005). Similar older Pleistocene sediments throughout the lowland (valley) areas of Riverside County and the Inland Empire have been reported to yield significant fossils of extinct terrestrial mammals from the last Ice Age (see references in Scott, 2005 [attached], and Jefferson, 1991), such as mammoths, mastodons, giant ground sloths, dire wolves, short-faced bears, saber-toothed cats, large and small horses, camels, and bison. The closest recorded terrestrial vertebrate fossil localities are located about six miles to the east, southwest of Lakeview Hot Springs on the southeast side of the Perris Reservoir (E. G. Scott, 2013, attached; SBCM localities 5.3.151 and 5.3.153). Fossil vertebrates collected from these localities included mammoths, extinct horses, and extinct bison. In another report, Reynolds (2004) reported fossil *Bison* from a location approximately seven to eight miles northeast of the current project from a depth of 17 feet below the ground surface, suggesting that they were from Pleistocene older alluvial or older alluvial fan sediments.

Recommendations: Because of the High Paleontological Sensitivity (High B) assigned to the older alluvial fan deposits (Qvof_a on Attachment 3) across much of the project site, full-time paleontological monitoring of mass grading and excavation (utility trenching, etc.) activities in areas mapped as Quaternary older alluvial fan deposits should be required in order to mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources (*i.e.*, fossils). Paleontological monitoring is not required where the Cretaceous granitic rocks are exposed at the surface or in the shallow subsurface (less than four feet below ground level) on the west side of the project. The Mitigation Monitoring and Reporting Program (MMRP) should be consistent with the provisions of the


California Environmental Quality Act (CEQA), regulations currently implemented by the County of Riverside, and the proposed guidelines of the Society of Vertebrate Paleontology (attached below).

If you have any questions concerning this evaluation, please feel free to contact us at our Poway address. Thank you for the opportunity to provide paleontological services on this project.

Sincerely,

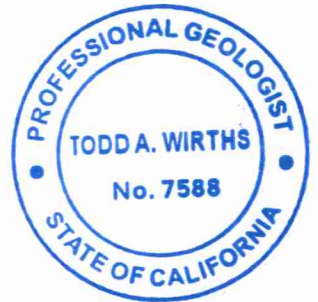


George L. Kennedy, Ph.D.
Senior Paleontologist



Todd A. Wirths, M.S.
California Professional Geologist No. 7588

Attachments: Index maps, geologic map, paleontological sensitivity map, SBCM records
search reports (Scott, 2005, 2013)



References:

- Jefferson, G. T. 1991. A catalogue of late Quaternary vertebrates from California: Part two, mammals. Natural History Museum of Los Angeles County, Technical Reports, no. 7: i-v + 1-129.
- Morton, D. M. 2001. Geologic map of the Steele Peak 7.5' quadrangle, Riverside County, California: U. S. Geological Survey, Open-File Report 01-449: 1 map sheet with text, scale 1:24,000.
- 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: 1 map sheet with text, scale 1:24,000.
- Reynolds, R. E. 2004. Paleontological resource investigation, Moreno Highlands fault investigation. *In* unpublished geologic report prepared by Leighton & Associates, 2004, Preliminary fault investigation, Tentative Tract Map No. 32501, Moreno Highlands, City of Moreno Valley, Project No. 111061-1031.
- Scott, E. G. 2005. Paleontology literature and records review, Stratford Ranch project (BFSA # 04-175), Perris region, Riverside County, California. Unpublished report prepared for Brian F. Smith and Associates, Poway, by the Division of Geological Sciences, San Bernardino County Museum, Redlands.
- Scott, E. G. 2013. Paleontology literature and records review, Ecos Nuevo project, Lakeview Hot Springs region, Riverside County, California. Unpublished report prepared for Brian F. Smith and Associates, Inc., Poway, by the Division of Geological Sciences, San Bernardino County Museum, Redlands.

Paleontological Mitigation Monitoring and Reporting Program (MMRP)

Seaton Commerce Center Project

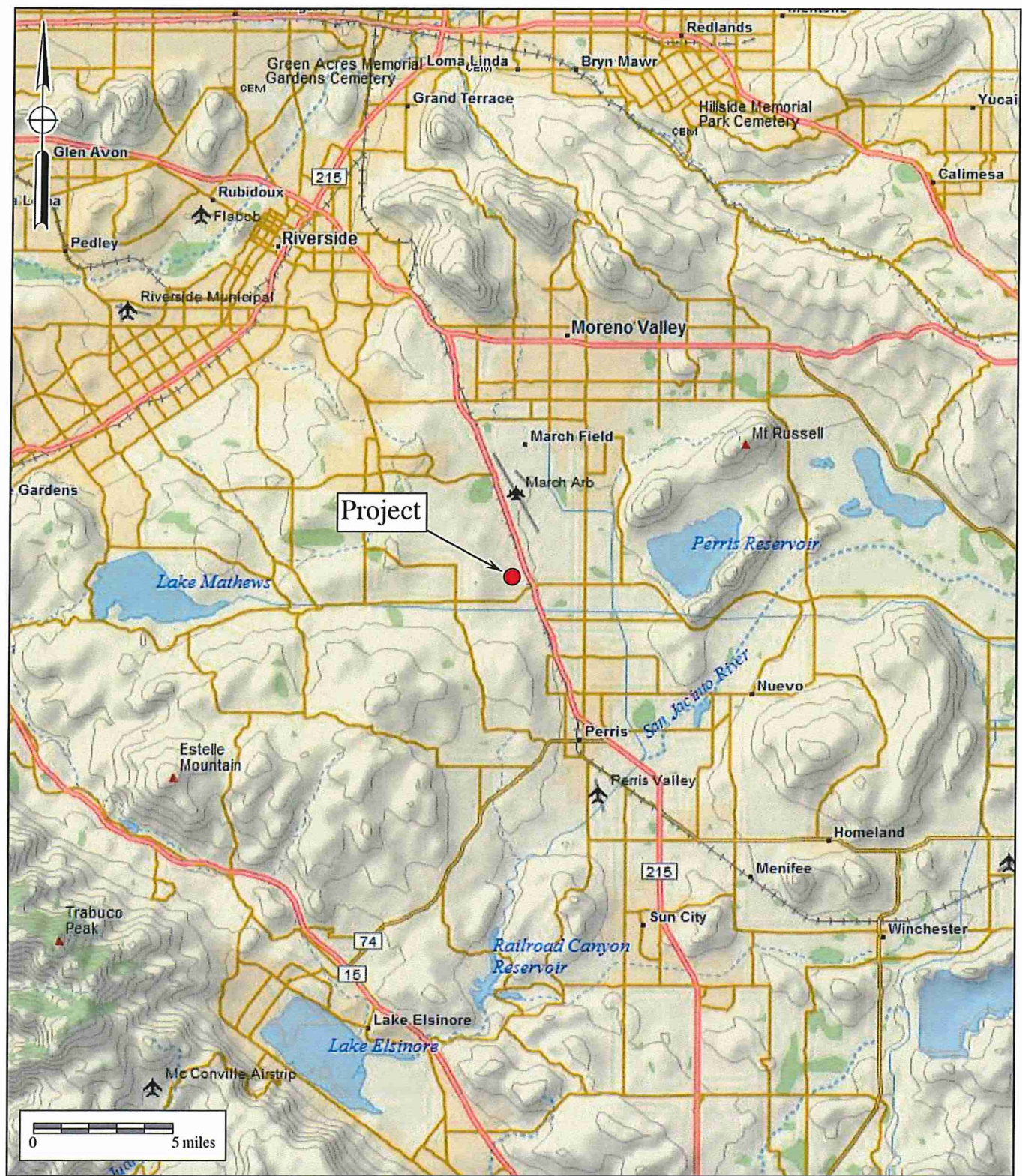
(PPT180025, CEQ180101; GEO180039)

1. Monitoring of mass grading and excavation activities in areas identified as likely to contain paleontological resources by a qualified paleontologist or paleontological monitor. Full-time monitoring will be conducted in areas of grading or excavation in undisturbed, very old alluvial fan sediments (Qvof_a on Attachment 3). Paleontological monitors will be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediments 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 of Cretaceous granitic rocks (Kvt on Attachment 3) at the surface or in the shallow subsurface (four-foot depth) along the west side of the project area is not necessary. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified paleontological personnel to have a low potential to contain or yield fossil resources.

2. Preparation of recovered specimens to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Preparation of individual vertebrate fossils is often more time-consuming than for accumulations of invertebrate fossils.

3. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage. Pursuant to the County of Riverside's "SABER Policy" (Safeguard Artifacts Being Excavated in Riverside County) for recovered fossils, they should, by preference be directed to (deposited at) the Western Science Center Museum, 2345 Searl Parkway, Hemet, California 92543. The paleontological program should include a written repository agreement prior to the initiation of mitigation activities.

4. Preparation of a final monitoring and mitigation report of findings and significance, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location. The report, when submitted to the appropriate lead agency (County of Riverside), will signify satisfactory completion of the project program to mitigate impacts to any paleontological resources.

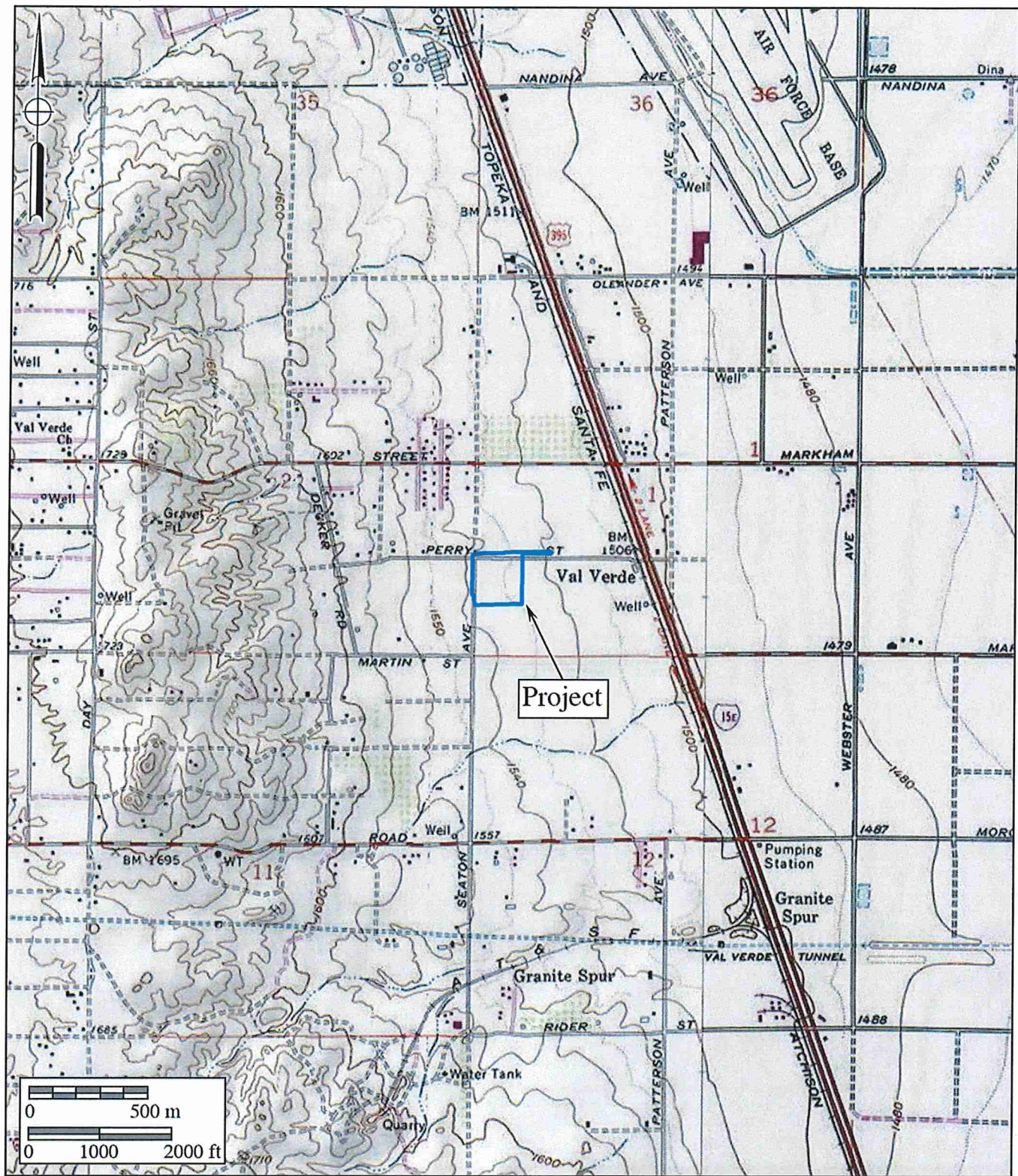


Attachment 1 **General Location Map**

The Seaton Commerce Center Project

DeLorme (1:250,000)





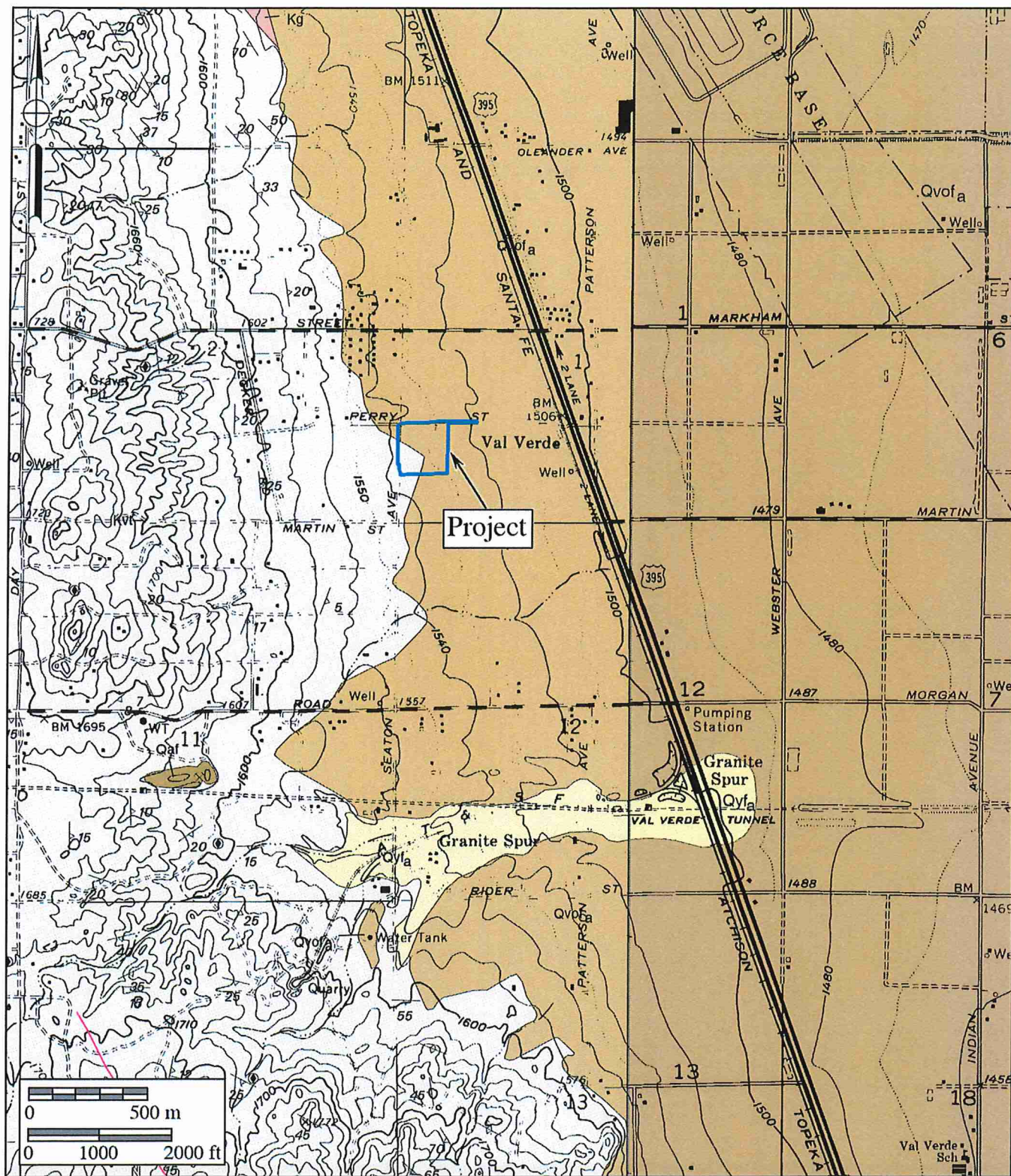
Attachment 2

Project Location Map

The Seaton Commerce Center Project

USGS Steele Peak and Perris Quadrangles (7.5 minute series)





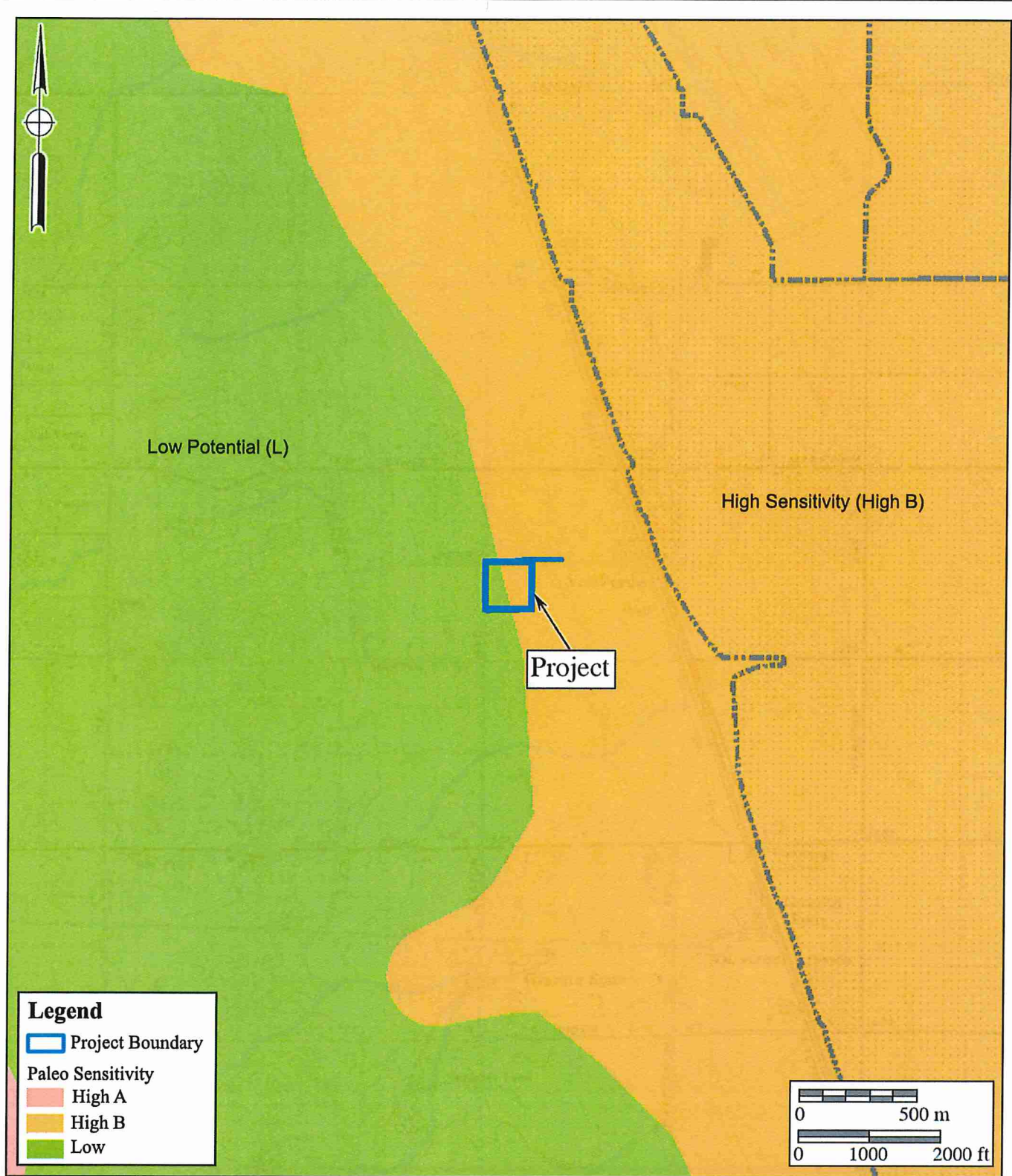
Attachment 3

Geologic Map

The Seaton Commerce Center Project

Geology after Morton (2001) and Morton (2003)





Attachment 4

Paleontological Sensitivity Map

The Seaton Commerce Center Project



SAN BERNARDINO COUNTY MUSEUM

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(909) 307-2669 • Fax (909) 307-0539 • www.sbcountymuseum.org



COUNTY OF SAN BERNARDINO
ECONOMIC DEVELOPMENT
AND PUBLIC SERVICES GROUP

ROBERT L. McKERNAN
Director

11 January 2005

Brian F. Smith & Associates
attn: George L. Kennedy, Ph.D.
14010 Poway Road, Suite "A"
Poway, CA 92064

re: **PALEONTOLOGY LITERATURE AND RECORDS REVIEW, STRATFORD
RANCH PROJECT (BFSA # 04-175), PERRIS REGION, RIVERSIDE COUNTY,
CALIFORNIA**

Dear Dr. Kennedy,

The Division of Geological Sciences of the San Bernardino County Museum (SBCM) has completed a literature review and records search for the above-named property north of the City of Perris, Riverside County, California. The study area is located in the western portion of section 5, Township 4 South, Range 3 West, San Bernardino Base and Meridian, as seen on the Perris, California 7.5' United States Geological Survey topographic quadrangle map (1967 edition, photorevised 1973).

Previous geologic mapping (Rogers, 1965; Morton, 2004) indicates that the proposed study area is located primarily upon surface and subsurface early to middle Pleistocene alluvial fan deposits (= unit **Qvof_a**), overlain in the eastern portion of the property by a thin veneer of Holocene alluvial valley deposits (= **Qyv_{sa}**). The Holocene alluvium is too recently deposited to have potential to contain fossil resources, and so is assigned low paleontologic sensitivity. However, the older Pleistocene alluvial deposits have high potential to contain significant nonrenewable paleontologic resources, and so are assigned high paleontologic sensitivity. Similar older Pleistocene sediments throughout Riverside County and the Inland Empire have been reported to yield significant fossils of plants and extinct animals from the Ice Age (Jefferson, 1991; Reynolds and Reynolds, 1991; Woodburne, 1991; Springer and Scott, 1994; Scott, 1997; Springer and others, 1998, 1999; Anderson and others, 2002). Fossils recovered from these Pleistocene sediments represent extinct taxa including mammoths, mastodons, ground sloths, dire wolves, short-faced bears, sabre-toothed cats, large and small horses, large and small camels, and bison (Springer and Scott, 1994; Scott, 1997; Springer and others, 1998, 1999; Anderson and others, 2002).

For this review, I conducted a search of the Regional Paleontologic Locality Inventory (RPLI) at the SBCM. The results of this search indicate that no previously-known paleontologic resource localities are recorded by the SBCM from within the study area, nor from within at least one mile in any direction.

MARK H. UFFER

County Administrative Officer
NORMAN A. KANOLD
Assistant County Administrator
Economic Development and
Public Services Group

Board of Supervisors

BILL POSTMUS	First District	DENNIS HANSBERGER	Third District
PAUL BIANE	Second District	GARY C. OVITT	Fourth District
JOSIE GONZALES	Fifth District		

Recommendations

The results of the literature review and the check of the RPLI at the SBCM demonstrate that excavation in conjunction with development may have high potential to adversely impact significant nonrenewable paleontologic resources present within the boundaries of the proposed Stratford Ranch development. A qualified vertebrate paleontologist must be retained to develop a program to mitigate impacts to such resources. This mitigation program should be consistent with the provisions of the California Environmental Quality Act (Scott and Springer, 2003), as well as with regulations currently implemented by the County of Riverside and the proposed guidelines of the Society of Vertebrate Paleontology. This program should include, but not be limited to:

1. Monitoring of excavation in areas identified as likely to contain paleontologic resources by a qualified paleontologic monitor. Based upon the results of this review, areas of concern include all previously-undisturbed sediments of fossiliferous Pleistocene older alluvium present within the boundaries of the property. Paleontologic monitors should be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. Monitors must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens. Monitoring may be reduced if the potentially-fossiliferous units described herein are not present, or if present are determined upon exposure and examination by qualified paleontologic personnel to have low potential to contain fossil resources.
2. Preparation of recovered specimens to a point of identification and permanent preservation, including washing of sediments to recover small invertebrates and vertebrates.
3. Identification and curation of specimens into an established, accredited museum repository with permanent retrievable paleontologic storage (e.g., SBCM). The paleontologist must have a written repository agreement in hand prior to the initiation of mitigation activities. Mitigation of adverse impacts to significant paleontologic resources is not complete until such curation into an established museum repository has been fully completed and documented.
4. Preparation of a report of findings with an appended itemized inventory of specimens. The report and inventory, when submitted to the appropriate Lead Agency along with confirmation of the curation of recovered specimens into an established, accredited museum repository, will signify completion of the program to mitigate impacts to paleontologic resources.

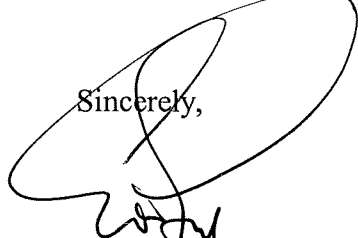
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- Scott, E. and K. Springer, 2003. CEQA and fossil preservation in southern California. *The Environmental Monitor*, Fall 2003, p. 4-10, 17.
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- Springer, K.B., E. Scott, J.C. Sagebiel and K.M. Scott, 1999. A late Pleistocene lake edge vertebrate assemblage from the Diamond Valley, Riverside County, California. *Journal of Vertebrate Paleontology* 19(3): 77-A.
- Woodburne, M.O., 1991. The Cajon Valley, *in* Inland Southern California: the last 70 million years, M.O. Woodburne, S.F.B. Reynolds, and D.P. Whistler, eds. Redlands, San Bernardino County Museum Special Publication 38(3&4), p. 41-43.

Please do not hesitate to contact us with any further questions you may have.

Sincerely,



Eric Scott, Curator of Paleontology
Division of Geological Sciences
San Bernardino County Museum



SAN BERNARDINO COUNTY MUSEUM

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(909) 307-2669 ~ Fax (909) 307-0539 www.sbcountymuseum.org



COUNTY OF SAN BERNARDINO

ROBERT L. McKERNAN
Director

2 April 2013

Brian F. Smith and Associates
attn: George L. Kennedy, Ph.D., Senior Paleontologist
14010 Poway Road, Suite A
Poway, CA 92064

re: **PALEONTOLOGY LITERATURE AND RECORDS REVIEW, ECOS NUEVO
PROJECT, LAKEVIEW HOT SPRINGS REGION, RIVERSIDE COUNTY,
CALIFORNIA**

Dear Dr. Kennedy,

The Division of Geological Sciences of the San Bernardino County Museum (SBCM) has completed a literature review and records search for the above-named project in the Lakeview Hot Springs region of Riverside County, California. The proposed project property is located in the southeastern quadrant of section 12, Township 4 South, Range 3 West, San Bernardino Base and Meridian, as seen on the Perris, California 7.5' United States Geological Survey topographic quadrangle map (1967 edition).

Previous geologic mapping (Rogers, 1965; Morton, 2003) indicates that the proposed project property is situated entirely upon active valley deposits of recent age (= unit Qv_{sc}) associated with the present-day San Jacinto River. These sediments have low potential to contain significant nonrenewable paleontologic resources in a reliable stratigraphic context, and so are assigned low paleontologic sensitivity. However, these sediments overlie older Pleistocene alluvium (= $Qvof_n$) that has high paleontologic sensitivity. Similar older Pleistocene sediments throughout Riverside and San Bernardino Counties and the Inland Empire have been previously reported to yield significant fossils of plants and extinct animals from the Ice Age (Jefferson, 1991; Reynolds and Reynolds, 1991; Anderson and others, 2002; Springer and others, 2009, 2010; Scott, 2010). Fossils recovered from these Pleistocene sediments represent extinct taxa including mammoths, mastodons, ground sloths, dire wolves, short-faced bears, sabre-toothed cats, large and small horses, large and small camels, and bison (Jefferson, 1991; Reynolds and Reynolds, 1991; Springer and others, 2009, 2010; Scott, 2010).

For this review, I conducted a search of the Regional Paleontologic Locality Inventory (RPLI) at the SBCM. The results of this search indicate that two previously-known paleontologic resource localities are recorded by the SBCM within $\frac{1}{4}$ to $\frac{1}{2}$ mile of portions of the proposed study area. These localities, SBCM 5.3.151 and 5.3.153, yielded fossils of late Pleistocene vertebrates including

mammoths, horses, and bison from Pleistocene older alluvium. The proximity of these localities to the proposed project demonstrates the high paleontologic sensitivity of Pleistocene older alluvium at the surface and in the subsurface in this region.

Recommendations

The results of the literature review and the search of the RPLI at the SBCM demonstrate that the above named study area is located on subsurface Pleistocene alluvial sediments with high potential to contain paleontologic resources. A qualified vertebrate paleontologist must develop a program to mitigate impacts to nonrenewable paleontologic resources. This mitigation program must be consistent with the provisions of the California Environmental Quality Act (Scott and Springer, 2003), as well as with regulations implemented by the County of Riverside. This program should include, but not be limited to:

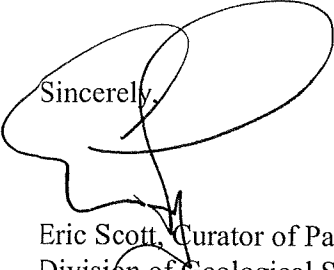
1. Monitoring of excavation into rock units having high potential to contain significant nonrenewable paleontologic resources. Based upon the results of this review, all Pleistocene older alluvial sediments present within the area of potential effect are considered to have high potential to contain such resources. Paleontologic monitors should be equipped to salvage fossils as they are unearthed, to avoid construction delays, and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. Monitors must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens.
2. Preparation of recovered specimens to a point of identification and permanent preservation, including washing of sediments to recover small invertebrates and vertebrates. Preparation and stabilization of all recovered fossils are essential in order to fully mitigate adverse impacts to the resources (Scott and others, 2004).
3. Identification and curation of specimens into an established, accredited museum repository with permanent retrievable paleontologic storage. These procedures are also essential steps in effective paleontologic mitigation (Scott and others, 2004) and CEQA compliance (Scott and Springer, 2003). The paleontologist must have a written repository agreement in hand prior to the initiation of mitigation activities. Mitigation of adverse impacts to significant paleontologic resources is not complete until such curation into an established, accredited museum repository has been fully completed and documented.
4. Preparation of a report of findings with an appended itemized inventory of specimens. The report and inventory, when submitted to the appropriate Lead Agency along with confirmation of the curation of recovered specimens into an established, accredited museum repository, will signify completion of the program to mitigate impacts to paleontologic resources.

References

- Anderson, R.S., M.J. Power, S.J. Smith, K.B. Springer and E. Scott, 2002. Paleoecology of a Middle Wisconsin deposit from southern California. *Quaternary Research* 58(3): 310-317.
- Jefferson, G.T., 1991. A catalogue of late Quaternary vertebrates from California: Part Two, mammals. Natural History Museum of Los Angeles County Technical Reports, No. 7.
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- Reynolds, S.F.B. and R.L. Reynolds, 1991. The Pleistocene beneath our feet: near-surface Pleistocene fossils in inland southern California basins. *In* M.O. Woodburne, S.F.B. Reynolds, and D.P. Whistler (eds.), *Inland Southern California: the last 70 million years*. Redlands: San Bernardino County Museum Special Publication 38(3&4), p. 41-43.
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- Scott, E. and S.M. Cox, 2008. Late Pleistocene distribution of *Bison* (Mammalia; Artiodactyla) in the Mojave Desert of southern California and Nevada. *In* X. Wang and L.G. Barnes (eds.), *Geology and vertebrate paleontology of western and southern North America: Contributions in honor of David P. Whistler*. Natural History Museum of Los Angeles County Science Series No. 41, p. 359 - 382.
- Scott, E. and K. Springer, 2003. CEQA and fossil preservation in southern California. *The Environmental Monitor*, Fall 2003, p. 4-10, 17.
- Scott, E., K. Springer and J.C. Sagebiel, 2004. Vertebrate paleontology in the Mojave Desert: the continuing importance of "follow-through" in preserving paleontologic resources. *In* M.W. Allen and J. Reed (eds.) *The human journey and ancient life in California's deserts: Proceedings from the 2001 Millennium Conference*. Ridgecrest: Maturango Museum Publication No. 15, p. 65-70.
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- Springer, K., E. Scott, J.C. Sagebiel, and L.K. Murray, 2010. Late Pleistocene large mammal faunal dynamics from inland southern California: the Diamond Valley Lake local fauna. *In* E. Scott and G. McDonald (eds.), *Faunal dynamics and extinction in the Quaternary: Papers honoring Ernest L. Lundelius, Jr.* *Quaternary International* 217: 256-265.

Please do not hesitate to contact us with any further questions you may have.

Sincerely,



Eric Scott, Curator of Paleontology
Division of Geological Sciences
San Bernardino County Museum