



14 January 2019

Mr. Daniel A. Weis
Advantage Environmental Consultants, LLC
145 Vallecitos De Oro, Suite 201
San Marcos, California 92069

Subject: Paleontological Resource and Mitigation Monitoring Assessment, First Industrial Wilson Avenue Project, Perris, Riverside County, California (APN 300-170-009)

Dear Mr. Weis:

Introduction and Site Location: A paleontological resource and mitigation monitoring assessment has been completed for the First Industrial Wilson Avenue property in the city of Perris, west of the Perris Reservoir in Riverside County, California (Attachments 1 and 2). The 15.6-acre First Industrial Wilson Avenue property is located south of Rider Street, east of Wilson Avenue, north of Placentia Avenue, and west of the Perris Valley Storm Drain Channel. The site has previously undergone agricultural usage. The project may be identified as Assessor's Parcel Number (APN) 300-170-009. On the U. S. Geological Survey 7.5-minute, 1:24,000-scale Perris, California topographic quadrangle map, the property is located in the northeast quarter of Section 17, Township 4 South, Range 3 West, San Bernardino Base and Meridian (Attachment 2). At the time of this writing, any intended improvements planned for the property are not known.

Geology: The geology of the project site and immediately surrounding areas is shown on the published geologic map of the Perris quadrangle (Attachment 3, after Morton, 2003, Preliminary geologic map of the Perris 7.5' quadrangle, Riverside County, California). The map indicates that the project site is located on Holocene ("modern") and upper Pleistocene (10,000 to perhaps 100,000 year old) young alluvial valley deposits (Qy_{vs}_a, shown in light yellow on Attachment 3), which may overlies at depth, older, lower Pleistocene (approximately 1.8 million to perhaps 200,000 to 300,000 year old) very old alluvial fan deposits (Qv_{of}_a, shown in light brown on Attachment 3). Geotechnical reports prepared for a project located very close to this site, on the north side of East Rider Street, (Mitchell and Trazo, 2017a, 2017b) identified near surface alluvium extending to depths of three to greater than 12 feet below ground level. The authors also indicated that "at greater depths, the alluvium generally consists of stiff to very stiff silty clays and clayey silts," but did not comment on the age of the sediments (*i.e.*, whether they were Holocene ["modern"] or Pleistocene in age) (Mitchell and Trazo, 2017a, 2017b). The age of these sediments is important in determining if they should be accorded a Low paleontological sensitivity (Holocene) or a High paleontological sensitivity (Pleistocene).

Paleontological Sensitivity: A paleontological sensitivity map generated by the Riverside County Land Information System in January 2019 (Attachment 4) ranks the entire project area as having a High Paleontological 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 four feet of depth, and may be impacted during excavation by construction activities. Young alluvial valley sediments (Qyv) and very old alluvial fan sediments (Qvof) assigned a High Potential/Sensitivity (High B) to yield nonrenewable paleontological resources (*i.e.*, fossils) are shown in an amber tint on Attachment 4. The Conservation Element of the City of Perris General Plan, adopted by the City Council on February 18, 2008, assigns a Low to High Paleontological Sensitivity to this area, where younger alluvium (Low sensitivity) may overlies older valley alluvium and older alluvial fan deposits (High sensitivity) at depths beyond five feet.

Paleontological Resources: No previously recorded fossil localities are known from the vicinity of the project site, based on a previous paleontological literature review and a collections and records search conducted by the Geological Sciences Division of the San Bernardino County Museum (SBCM) in Redlands, California for the Stratford Ranch project, which encompassed three-fourths of adjacent Section 5 (Scott, 2005, attached). Based on this report, as well as another for a project located on very old alluvial fan sediments (Scott, 2015, attached), the very old Pleistocene alluvial fan deposits (Qvof_a on Attachment 3) that directly underlie the younger alluvial valley sediments (Qyv) have a High potential to contain significant nonrenewable paleontological resources, and are thus assigned a “High paleontological resource sensitivity” (Scott, 2005, 2015; McLeod, *in* Stewart, 2016). Similar older Pleistocene alluvial fan sediments throughout the lowland (valley) areas of western 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, 2015), such as mammoths, mastodons, giant ground sloths, dire wolves, short-faced bears, saber-toothed cats, large and small horses, camels, and bison. However, the earlier collections and records search report for the Stratford Ranch project (Scott, 2005), did not identify any nearby fossil localities within the boundaries of that project site, nor within a one-mile radius, encompassing the First Industrial Wilson Avenue property.

The closest recorded fossil localities may be those reported by the San Bernardino County Museum (localities SBCM 5.3.151 and 5.3.153; *in* Scott, 2013) from Pleistocene older alluvium near the Lakeview Hot Springs area on the southeast side of the Perris Reservoir. Fossil vertebrates collected from these localities included mammoth, extinct horse, and extinct bison. In another report, Reynolds (2004) reported fossil *Bison* from a location approximately six miles northeast of the current project at a depth of 17 feet below ground surface, suggesting that the fossil was from Pleistocene older alluvial or older alluvial fan sediments.

Another collections and records search of the Vertebrate Paleontology Section of the Natural History Museum of Los Angeles County (LACM) in Los Angeles of a property approximately one mile northwest of the First Industrial Wilson Avenue site (S. A. McLeod, 2016) is reported not to have identified any previously recorded fossil localities on that property, nor within at least a one-mile radius of it. Based on the reported geologic unit in the area (Quaternary older alluvial fan sediments, Qvof on Attachment 3), and the advice provided by Dr. McLeod (Stewart, 2016)

concluded that “a paleontological mitigation plan be prepared and implemented ..., which would include monitoring of excavations with potential to disturb Pleistocene sediments, testing of sediments for microvertebrate fossils, preparation and curation of specimens collected, and preparation of a final report in accordance with the [draft] guidelines of the Society of Vertebrate Paleontology.”

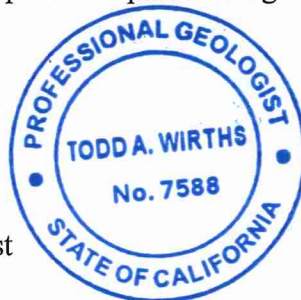
Recommendations: Because of the High paleontological sensitivity (High B) assigned to the lower Pleistocene very old alluvial fan deposits (Qvof_a on Attachment 3) that are overlain by the younger Holocene and upper Pleistocene sediments (Qyvs_a on Attachment 3) mapped across the site, and without any geologic information that defines the depth of the contact between the older and younger alluvial deposits, a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP) should be prepared prior to issuance of a grading permit for the project. The PRIMMP should call for full-time paleontological monitoring of mass grading and excavation activities that exceed four (4) feet in depth. Implementation of the PRIMMP and mitigation measures outlined in the attached Mitigation Monitoring and Reporting Program (MMRP) would reduce any potential adverse impacts (loss or destruction) to nonrenewable paleontological resources (*i.e.*, fossils) to a level less than significant.

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

Sincerely,



Todd Wirths, M.S., P.G. 7588
Senior Paleontologist, California Prof. Geologist



Attachments: Index maps, geologic map, paleontological sensitivity map, and SBCM records search reports (2)

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Recommendations: Because of the High paleontological sensitivity (High B) assigned to the lower Pleistocene very old alluvial fan deposits (Qvof_a on Attachment 3) that are overlain by the younger Holocene and upper Pleistocene sediments (Qyv_{sa} on Attachment 3) mapped across the site, and without any geologic information that defines the depth of the contact between the older and younger alluvial deposits, a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP) should be prepared prior to issuance of a grading permit for the project. The PRIMMP should call for full-time paleontological monitoring of mass grading and excavation activities that exceed four (4) feet in depth. Implementation of the PRIMMP and mitigation measures outlined in the attached Mitigation Monitoring and Reporting Program (MMRP) would reduce any potential adverse impacts (loss or destruction) to nonrenewable paleontological resources (*i.e.*, fossils) to a level less than significant.

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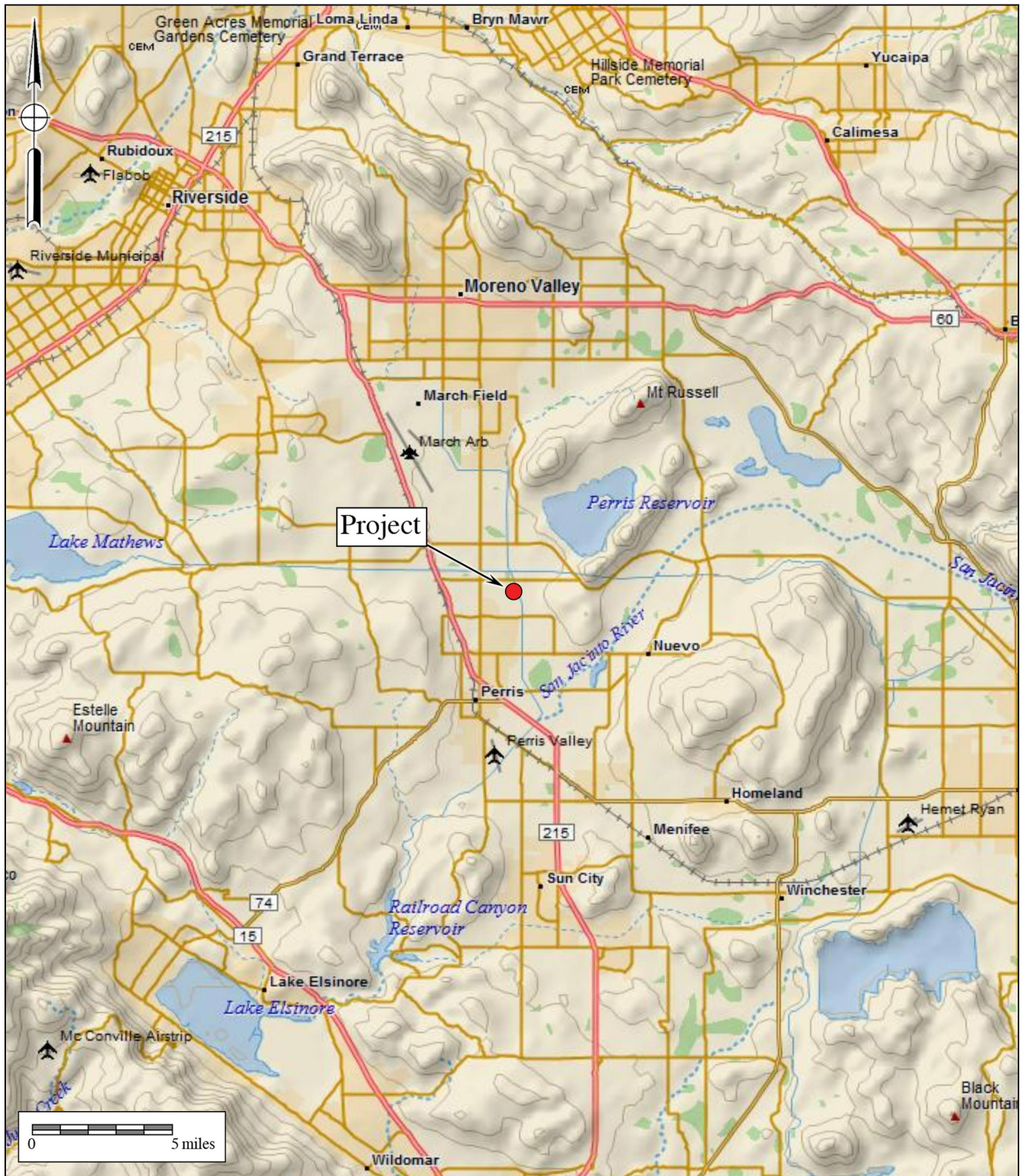
Paleontological Mitigation Monitoring and Reporting Program (MMRP)
First Industrial Wilson Avenue
APN 300-170-009

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 when a depth of four (4) feet or deeper is achieved in areas of grading or excavation in undisturbed, young alluvial valley sediments (Qyv_{sa} on Attachment 3) and underlying very old alluvial fan sediments (Qvof_a on Attachment 3) if encountered at depth. 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 may be reduced if the potentially fossiliferous units are not present in the subsurface, or if are present, are determined upon exposure and examination by qualified paleontological personnel to have a low potential to contain or yield fossil resources.

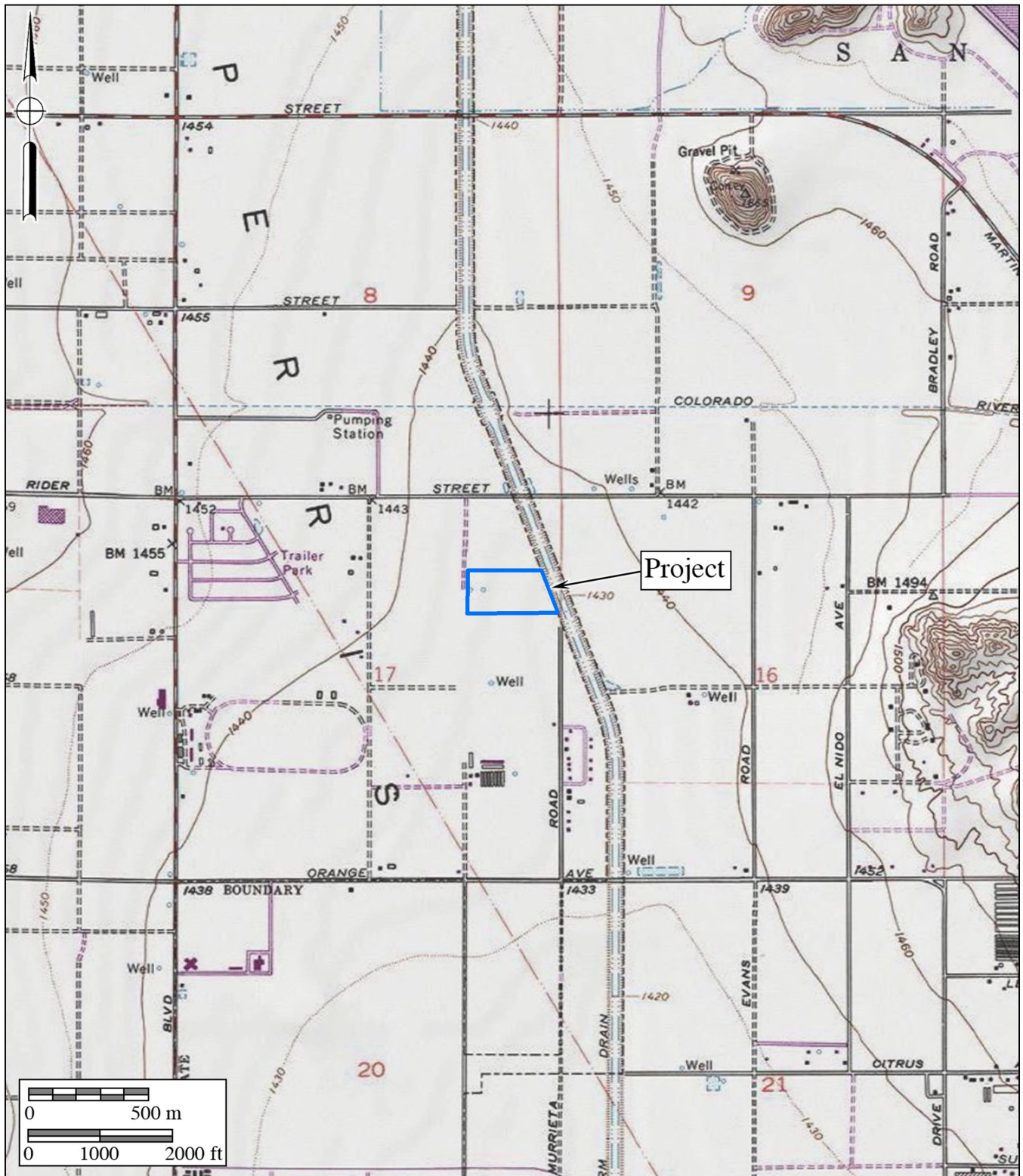
2. Preparation of recovered specimens to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Preparation of individual vertebrate fossils is often more time-consuming than for accumulations of invertebrate 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" for recovered fossils, they should, by preference, be directed to (deposited at) the Western Science Center Museum, 2345 Searl Parkway, Hemet, California 92543. The City of Perris may choose an alternate institution in which to deposit any recovered paleontological resources, if so desired. 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 (City of Perris), will signify satisfactory completion of the project program to mitigate impacts to any paleontological resources.



Attachment 1
General Location Map
 The First Industrial Wilson Avenue Project
 DeLorme (1:250,000)



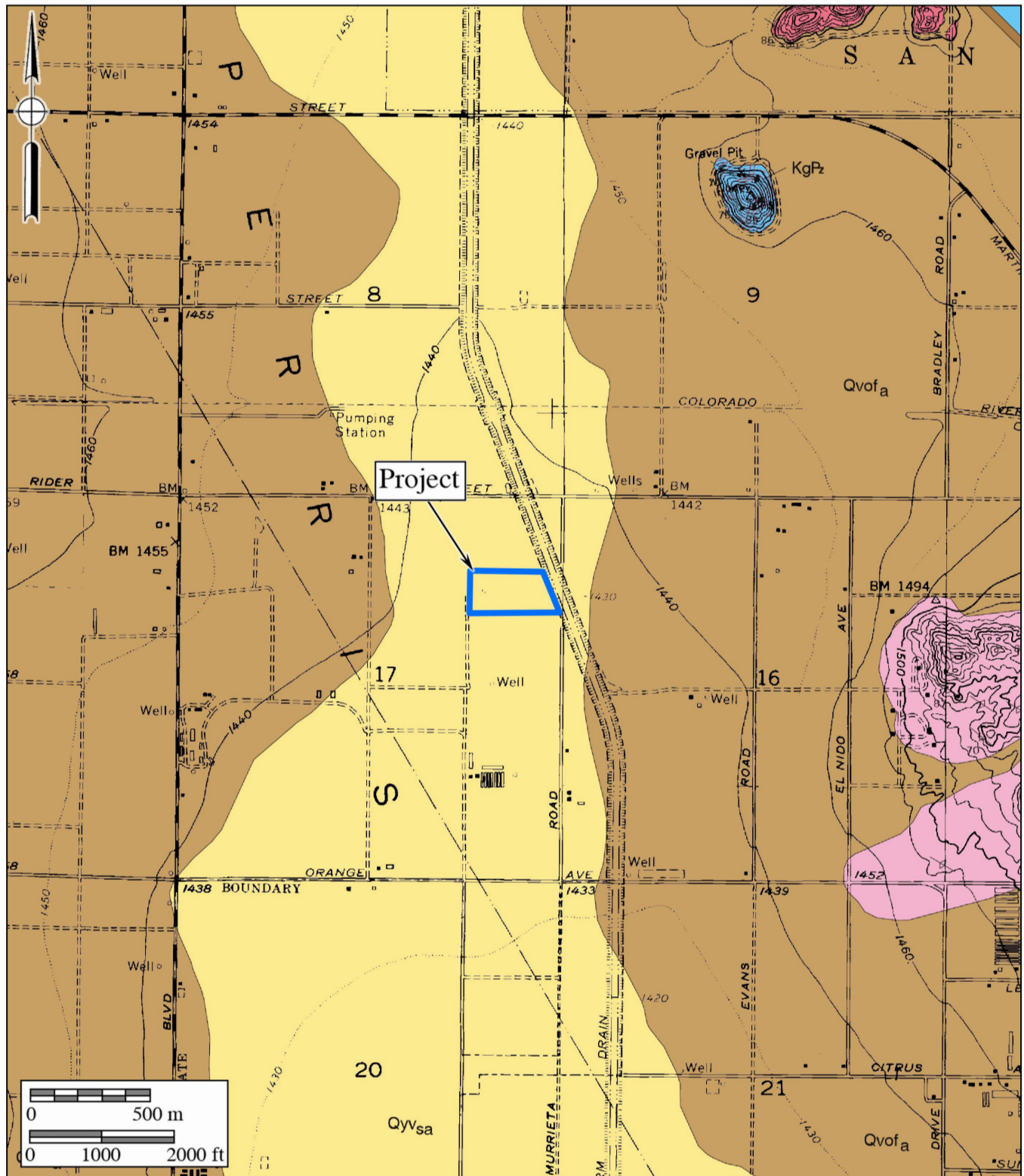
Attachment 2

Project Location Map

The First Industrial Wilson Avenue Project

USGS *Perris* Quadrangle (7.5-minute series)





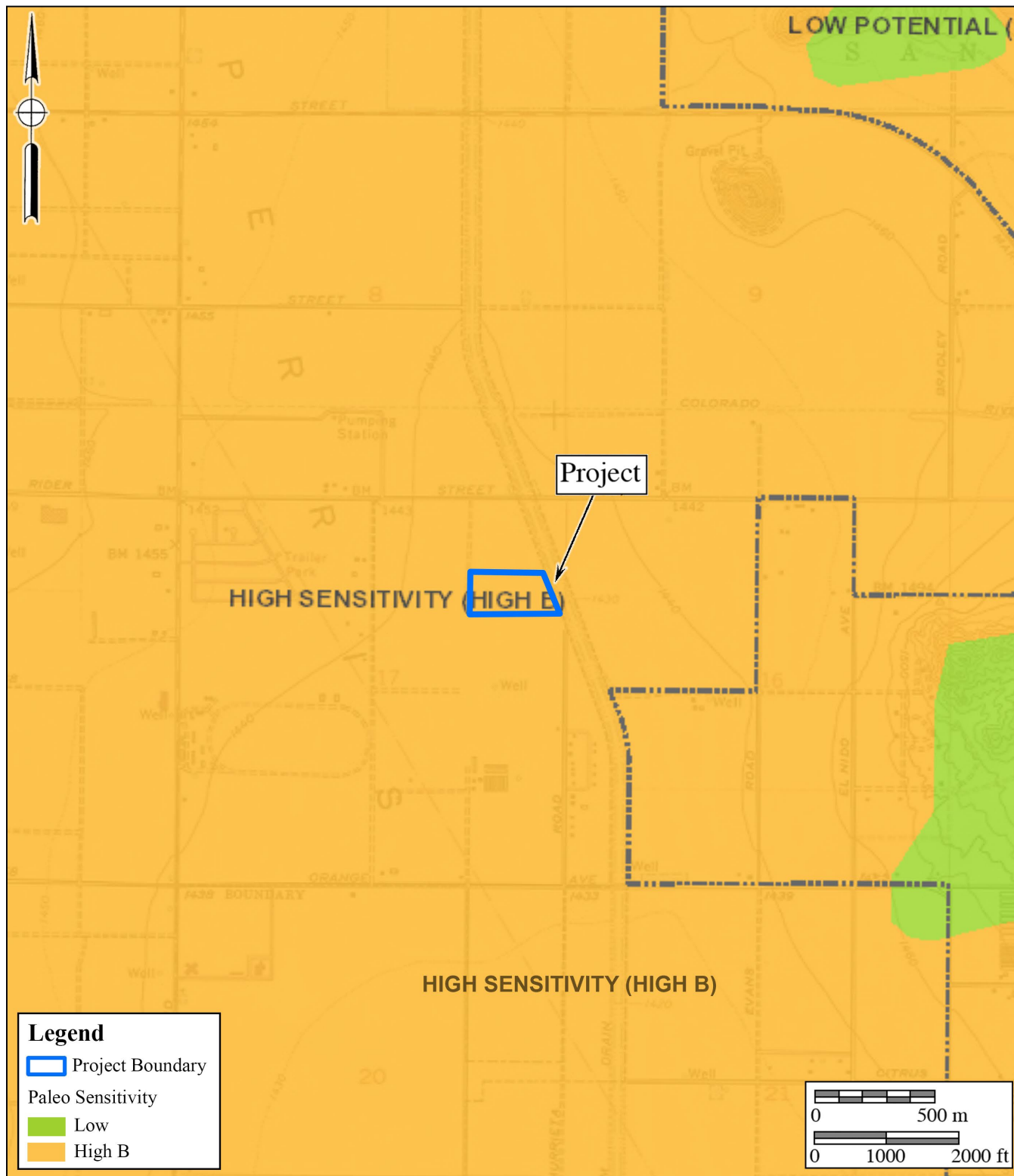
Attachment 3

Geologic Map

The First Industrial Wilson Avenue Project

Geology after Morton (2003)





Attachment 4

Paleontological Sensitivity Map

The First Industrial Wilson Avenue Project



SAN BERNARDINO COUNTY MUSEUM

2024 Orange Tree Lane • Redlands, California USA 92374-4560
(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

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Assistant County Administrator
Economic Development and
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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.

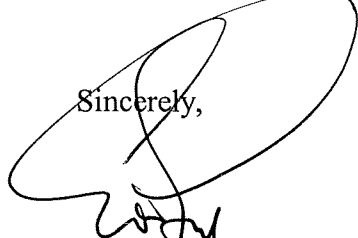
References

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- 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



Museum

Leonard X. Hernandez
Interim Museum Director

12 March 2015

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, MORENO
VALLEY LOGISTICS CENTER, CITY OF MORENO VALLEY, 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 City of Moreno Valley, Riverside County, California. Specifically, the proposed study area is located in the southwestern quadrant of section 30, Township 3 South, Range 3 West, San Bernardino Base and Meridian, as seen on the Perris, California and the Sunnymead, California 7.5' United States Geological Survey topographic quadrangle maps (1967 editions, photorevised 1973 and 1980, respectively).

Previous mapping of the proposed property (Rogers, 1965; Morton and Matti, 2001; Morton, 2003) indicates that the study area is situated entirely upon surface exposures of early Pleistocene alluvial fan deposits (= unit **Qvof_a**). These Pleistocene fan deposits may have high paleontologic sensitivity, depending upon their lithology. Pleistocene alluvium elsewhere throughout Riverside County and the Inland Empire has repeatedly been reported to yield significant fossils of extinct animals from the Ice Age (Jefferson, 1991; Reynolds, 1991; Anderson and others, 2002; Scott and Cox, 2008; Springer and others, 2009, 2010; Scott, 2010). Fossils recovered from these Pleistocene sediments represent extinct taxa including mammoths, mastodons, ground sloths, dire wolves, sabre-toothed cats, large and small horses, large and small camels, and bison (Jefferson, 1991; Reynolds, 1991; Scott and Cox, 2008; Springer and others, 2009, 2010; Scott, 2010), as well as plant macro- and microfossils (Anderson and others, 2002). If not previously disturbed by development, and depending upon the lithology exhibited, these sediments have high potential to contain significant nonrenewable paleontologic resources.

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-recorded fossil resource

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localities from Pleistocene older alluvium are present within the boundaries of the proposed development property, nor from at least within one mile in any direction.

Recommendations

The results of the literature review and the search of the RPLI at the SBCM demonstrate that the proposed study area is situated upon Pleistocene older alluvial deposits that, if not previously disturbed by development and depending upon their lithology, have high potential to contain paleontologic resources. Excavation in this older alluvium therefore has high potential to impact 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 currently implemented by the County of Riverside. 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. Areas requiring monitoring include all previously-undisturbed Pleistocene older alluvial sediments present, at the surface or at depth, 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 or eliminated if the potentially-fossiliferous units described herein 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. 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, would 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. Paleoeecology of a Middle Wisconsin deposit from southern California. *Quaternary Research* 58(3): 310-317.
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Please do not hesitate to contact us with any further questions you may have.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Scott'. The signature is stylized with a large, looping 'E' and a cursive 'S'.

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