# PALEONTOLOGICAL ASSESSMENT FOR THE 12118 BLOOMFIELD PROJECT

# CITY OF SANTA FE SPRINGS, LOS ANGELES COUNTY, CALIFORNIA

APN 8026-019-022

#### **Prepared on Behalf of:**

EPD Solutions 2 Park Plaza, Suite 1120 Irvine, California 92614

#### **Prepared for:**

City of Santa Fe Springs 11710 E. Telegraph Road Santa Fe Springs, California 90670

#### **Prepared by:**

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



October 7, 2021

#### **Paleontological Database Information**

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**Report Date:** October 7, 2021

**Report Title:** Paleontological Assessment for the 12118 Bloomfield Project,

City of Santa Fe Springs, Los Angeles County, California

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Assessor's Parcel Number: 8026-019-022

**USGS Quadrangle:** Unsectioned Township 3 South, Range 11 West (projected)

USGS Whittier, California Quadrangle (7.5-minute)

Study Area: 5.16 acres

**Key Words:** City of Santa Fe Springs; paleontological assessment;

Pleistocene old alluvial fan deposits; High sensitivity; monitoring

below five feet.

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

A paleontological resource assessment has been completed for the 12118 Bloomfield Project located at 12118 Bloomfield Avenue in the city of Santa Fe Springs, Los Angeles County, California (Figures 1 and 2). The 5.16-acre project occupies Assessor's Parcel Number (APN) 8026-019-022. On the United States Geological Survey 7.5-minute, 1:24,000-scale Whittier, California topographic quadrangle map, the project is located in unsectioned Township 3 South, Range 11 West (projected), San Bernardino Baseline and Meridian (see Figure 2). The project proposes the construction of a 107,472 square-foot industrial warehouse with associated parking and hardscape. Currently, the subject property is occupied by an existing industrial facility.

As the lead agency, the City of Santa Fe Springs 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. A paleontological field survey was not conducted since the surface of the project property is currently paved over.

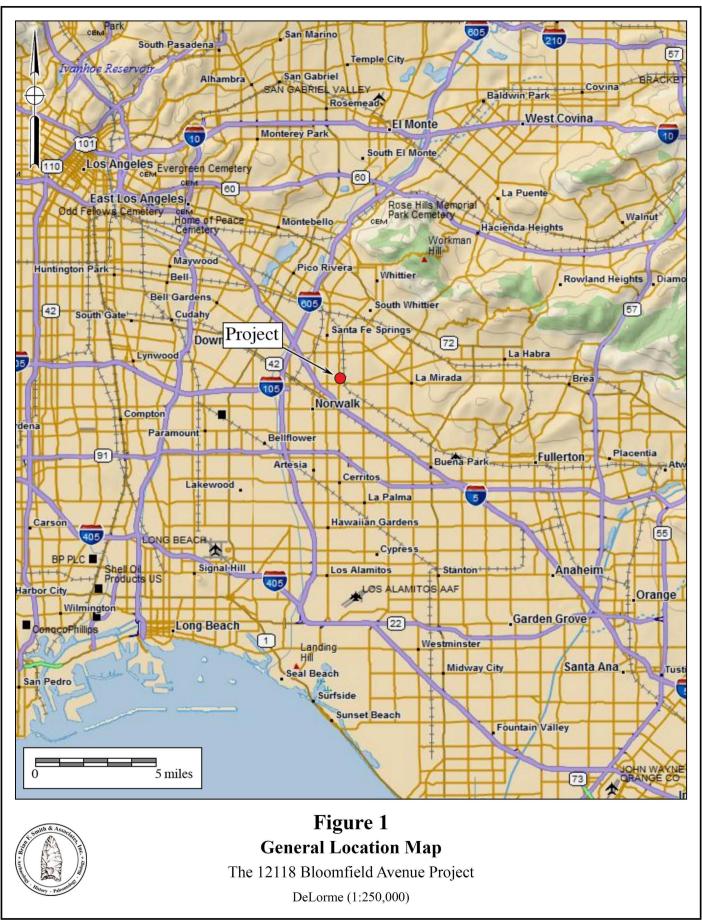
#### II. <u>REGULATORY SETTING</u>

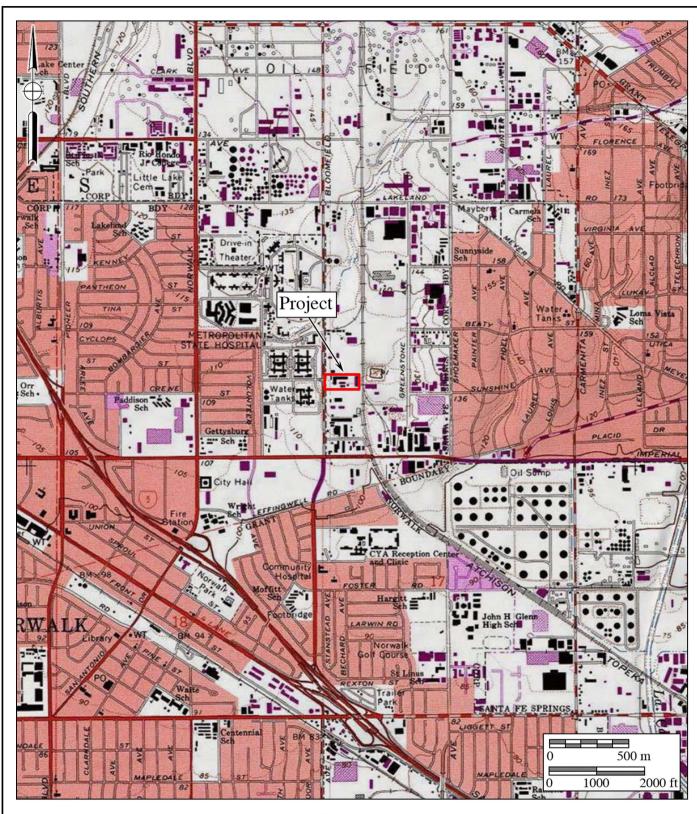
The California Environmental Quality Act (CEQA), which is patterned after the National Environmental Policy Act, is the overriding environmental regulation that sets the requirement for protecting California's paleontological resources. CEQA mandates that governing permitting agencies (lead agencies) set their own guidelines for the protection of nonrenewable paleontological resources under their jurisdiction.

#### State of California

Under "Guidelines for Implementation of CEQA," 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 that protects nonrenewable resources, including fossils:







# Figure 2 Project Location Map

The 12118 Bloomfield Avenue Project

USGS Whittier 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.

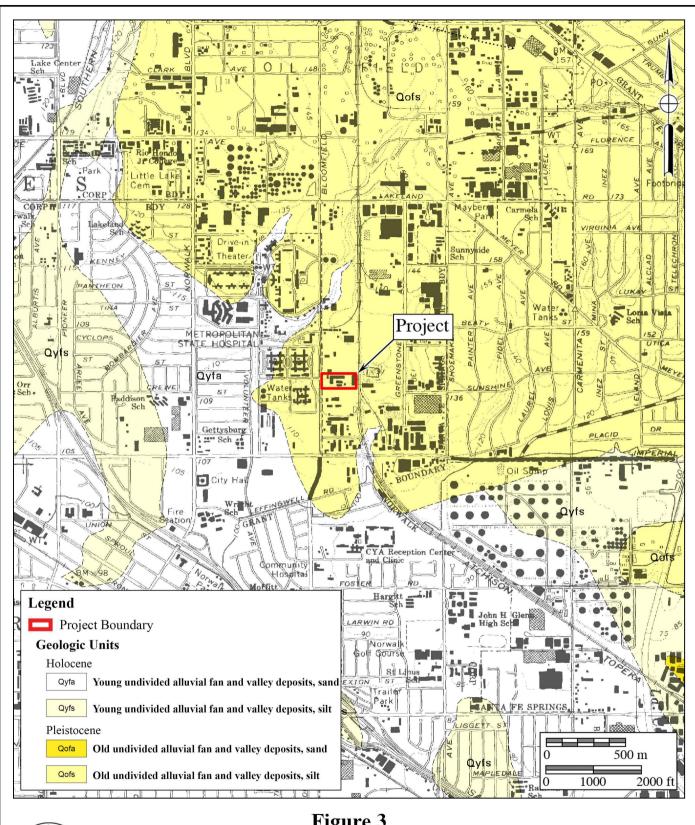
#### City of Santa Fe Springs

The current draft environmental impact report (EIR) for the General Plan of the City of Santa Fe Springs does not include paleontological resources (City of Santa Fe Springs 1994). According to the city website, the city is planning to finalize updated general plan and EIR documents in the Fall of 2021.

#### III. <u>GEOLOGY</u>

The project is located within the Central Basin of the larger Los Angeles Basin, a large structural sedimentary basin bounded and cut through by several active fault systems in the Los Angeles metropolitan area (Hillhouse et al. 2002). The San Gabriel River is approximately two and a half miles to the west (see Figure 1). As mapped by Saucedo (1999), the project is underlain by undivided Pleistocene silty, old alluvial fan and valley deposits (amber area labeled as "Qofs" on Figure 3). Yerkes (1972) assigned an age of upper Pleistocene and questionably Holocene to these alluvial deposits, describing them as reddish-brown consolidated gravel, sand, and silt.

A geotechnical investigation was recently performed for the project by Leighton Consulting, Inc. (Pflueger and Kim 2021). Findings from drilling and soil sampling activities indicated the project is covered by approximately two to five feet (with deeper localized spots) of undocumented fill soils that overlie undisturbed sandy clays and clayey sands to about 10 to 12 feet deep. In turn, this fine-grained horizon is generally underlain by silt and silty sands to about 20 feet deep, followed by mostly sands to the total depth explored of about 50 feet. To accommodate the planned construction, Pflueger and Kim (2021) recommended: the removal of all undocumented fill soils below the building footprint for replacement with engineered fill; a minimum of three feet of engineered fill should be established below the proposed foundation; an overexcavation depth of two feet below the surface is recommended for non-structural areas; deeper overexcavation may be warranted in places depending on encountered conditions.





# Figure 3 Project Location Map

The 12118 Bloomfield Avenue Project

Geology after Saucedo (1999)

#### 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 locality and records search was performed for the project by the Natural History Museum of Los Angeles County (LACM) (Bell 2021 [Appendix B]). The records search indicates that no fossil localities were identified within the project boundaries or near the project. The closest-known fossil locality is located approximately three miles east of the project, consisting of Pleistocene-aged horse remains from lacustrine (lake) deposits of the La Habra Formation (LACM loc. VP 3347). The nearest locality from unnamed alluvial deposits, possibly similar to those at the project, is identified in Commerce, between seven and eight miles to the northwest, consisting of Pleistocene-aged fish, snake, rodent, and rabbit remains, from a depth of 30 feet (LACM loc. VP 7702). Other, more distant nearby localities are summarized in the records search in Appendix B.

A review of published and unpublished literature was conducted for potential paleontological resources that are known in the vicinity of the project. Miller (1971) and Jefferson (1991) report on a locality between three and four miles east of the project along the Imperial Highway, yielding turkey, mastodon, ground sloth, deer, and horse remains of Pleistocene age (LACM loc. VP 1052). This locality, just southeast of LACM loc. VP 3347, is positioned within the Pleistocene La Habra Formation (Jefferson 1991), as mapped by Yerkes (1972).

### 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. Pleistocene (more than 11,700 years old) alluvial and alluvial fan deposits in the Los Angeles Basin, however, often 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 (Jefferson 1991). These Pleistocene sediments are accorded a High paleontological resource sensitivity.

#### <u>Professional Standards</u>

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:

- <u>High Potential:</u> 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; 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 significant but scattered nearby Pleistocene vertebrate localities and descriptions of the underlying regional and project-specific geology, an undetermined to high paleontological potential may be assigned to the project.

#### VI. CONCLUSIONS AND RECOMMENDATIONS

Research has confirmed the existence of potentially fossiliferous Pleistocene old alluvial fan deposits ("Qofs" on Figure 3) that are mapped at the surface of the project. The occurrence of terrestrial vertebrate fossils at shallow depths from Pleistocene alluvial fan sediments across the Los Angeles Basin is well documented. The "High" paleontological sensitivity rating typically assigned to Pleistocene alluvial fan sediments for yielding paleontological resources supports the recommendation that paleontological monitoring be implemented during mass grading and excavation activities in undisturbed Pleistocene old alluvial fan sediments to mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources. Full-time monitoring of undisturbed alluvial fan deposits at the project is warranted

starting at a depth of five feet below the surface.

If a fossil(s) is found at shallower depths, earth disturbance activities should be halted within a radius of 50 feet from the location of the fossil, and a qualified, project-level paleontologist shall be consulted to determine the significance of the fossilized remains. If the fossil is deemed significant by the paleontologist, full-time monitoring should be initiated at the project.

#### Mitigation Monitoring and Reporting Program (MMRP)

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

- 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. Starting at a depth of five feet, monitoring will be conducted full-time in areas of grading or excavation in undisturbed sediments of alluvial fan deposits.
- 2. If a fossil(s) is found at a shallower depth, earth disturbance activities should be halted within a radius of 50 feet from the location of the fossil, and a project-level paleontologist shall be consulted to determine the significance of the fossilized remains. If the fossil is deemed significant by the project-level paleontologist, full-time monitoring should be initiated at the project.
- 3. Paleontological monitors will be equipped to salvage fossils as they are unearthed to avoid construction delays. The monitor must be empowered to temporarily halt or divert equipment to allow 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 present, are determined on exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources. The monitor shall notify the project paleontologist, who will then notify the concerned parties of the discovery.
- 4. Paleontological salvage during trenching and boring activities is typically from the generated spoils and does not delay the trenching or drilling activities. Fossils are collected and placed in cardboard flats or plastic buckets and identified by field number, collector, and date collected. Notes are taken on the map location and stratigraphy of the site, which is photographed before it is vacated and the fossils are removed to a safe place. On mass grading projects, discovered fossil sites are protected by flagging to prevent them from being overrun by earthmovers (scrapers) before salvage begins. Fossils are collected in a similar manner, with notes and

photographs being taken before removing the fossils. Precise location of the site is determined with the use of handheld GPS units. If the site involves remains from a large terrestrial vertebrate, such as large bone(s) or a mammoth tusk, that is/are too large to be easily removed by a single monitor, a fossil recovery crew shall excavate around the find, encase the find within a plaster and burlap jacket, and remove it after the plaster is set. For large fossils, use of the contractor's construction equipment may be solicited to help remove the jacket to a safe location.

- 5. Isolated fossils are collected by hand, wrapped in paper, and placed in temporary collecting flats or five-gallon buckets. Notes are taken on the map location and stratigraphy of the site, which is photographed before it is vacated and the fossils are removed to a safe place.
- 6. Particularly small invertebrate fossils typically represent multiple specimens of a limited number of organisms, and a scientifically suitable sample can be obtained from one to several five-gallon buckets of fossiliferous sediment. If it is possible to dry screen the sediment in the field, a concentrated sample may consist of one or two buckets of material. For vertebrate fossils, the test is usually the observed presence of small pieces of bones within the sediments. If present, as many as 20 to 40 five-gallon buckets of sediment can be collected and returned to a separate facility to wet-screen the sediment.
- 7. In accordance with the "Microfossil Salvage" section of the Society of Vertebrate Paleontology guidelines (2010:7), bulk sampling and screening of fine-grained sedimentary deposits (including carbonate-rich paleosols) must be performed if the deposits are identified to possess indications of producing fossil "microvertebrates" to test the feasibility of the deposit to yield fossil bones and teeth.
- 8. In the laboratory, individual fossils are cleaned of extraneous matrix, any breaks are repaired, and the specimen, if needed, is stabilized by soaking in an archivally approved acrylic hardener (*e.g.*, a solution of acetone and Paraloid B-72).
- 9. Recovered specimens are prepared to a point of identification and permanent preservation (not display), including screen-washing sediments to recover small invertebrates and vertebrates. Preparation of individual vertebrate fossils is often more time-consuming than for accumulations of invertebrate fossils.
- 10. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage (e.g., the LACM) shall be conducted. The paleontological program should include a written repository agreement prior to the initiation of mitigation activities. Prior to curation, the lead agency (e.g., the City of Santa Fe Springs) will be consulted on the repository/museum to receive the fossil material.
- 11. A final report of findings and significance will be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original

TODD A. WIRTH

location(s). The report, when submitted to, and accepted by, the appropriate lead agency, will signify satisfactory completion of the project program to mitigate impacts to any potential nonrenewable paleontological resources (*i.e.*, fossils) that might have been lost or otherwise adversely affected without such a program in place.

#### VII. <u>CERTIFICATION</u>

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 problem 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, Alyssa. 2021. Paleontological resources for the 12118 Bloomfield Project (21-242). Natural History Museum of Los Angeles County. Letter prepared for Brian F. Smith and Associates, Inc., Poway, California.
- City of Santa Fe Springs. 1994. City of Santa Fe Springs general plan update draft environmental impact report. https://www.santafesprings.org/civicax/filebank/blobdload.aspx?BlobID=12756.
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- 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.
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- Pflueger, J.M. and Kim, C.C. 2021. Geotechnical exploration report, proposed industrial building, 12118 Bloomfield Avenue, Santa Fe Springs, California. Unpublished

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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. Electronic document, http://vertpaleo.org/Membership/Member-Ethics/SVP\_Impact\_Mitigation\_Guidelines.aspx.
- Yerkes, R.F. 1972. Geology and Oil Resources of the Western Puente Hills Area, Southern California: U.S. Geological Survey Professional Paper 420-C, 63 p.

# 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

**Paleontological Records 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

September 22, 2021

Brian F. Smith and Associates, Inc.

Attn: Todd Wirths

re: Paleontological resources for the 12118 Bloomfield Project (21-242)

#### Dear Todd:

I have conducted a thorough search of our paleontology collection records for the locality and specimen data for proposed development at the 12118 Bloomfield project area as outlined on the portion of the Whittier USGS topographic quadrangle map that you sent to me via e-mail on September 15, 2021. 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
LACM VP 3347	11204 Bluefield; Whittier	La Habra Formation (lacustrine silt with caliche and plant detritus)	Horse ( <i>Equus</i> )	2 feet bgs
LACM VP 4185-4201	Coyote Creek, adjacent to Ralph B Clark Regional Park in West Coyote Hills	La Habra Formation (Pleistocene; sandy silt shot through with caliche)	Bison (Bison), camel (Camelops), horse (Equus), mammoth (Mammuthus), mastodon (Mamut), elephant clade (Proboscidea), dire wolf (Canis dirus), Coyote (C. latrans), deer (Odocoileus), dwarf pronghorn (Capromeryx), unidentified artiodactyl; sea duck (Chendytes)	Surface, in creek bed
			Fish (Gasterosteus); Snake	
	Intersection of 26th	Unknown	(Colubridae), Rodents	
LACM VP	St and Atlantic Blvd,	formation	(Thomomys, Microtus,	
7702	Bell Gardens	(Pleistocene; silt)	Reithrodontomys); Rabbit	30 ft bgs

			(Sylvilagus)	
	near Compton			735 ft bgs
	(more precise	Unknown		(collected
	locality not	formation		from well
LACM IP 7	available)	(Pleistocene)	Oysters on a fragment of pecten excavations)	excavations)
	NE of the			
	intersection of	Unknown		
	Artesia Blvd and	formation		
LACM VP	Williams Ave.,	(Pleistocene; brown		
3382	Compton	clay silt)	Mammoth ( <i>Mammuthus</i> )	5 ft bgs
		Unknown		
LACM VP	Cover St & Pixie	formation		
3660	Ave; Lakewood	(Pleistocene)	Mammoth ( <i>Mammuthus</i> )	19 feet bgs
VD Wantake	ata Dalaantalaan ID	Importable Dalacet	VD Vortchart Palacetology ID Invertabrate Palacetology has heleve several surface	,

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

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

Sincerely, Alyssa Bell

Natural History Museum of Los Angeles County Alyssa Bell, Ph.D.

enclosure: invoice