PALEONTOLOGICAL RESOURCES ASSESSMENT REPORT

SIXTH STREET PROPERTIES SUB FUND, LLC WAREHOUSE PROJECT

Assessor's Parcel No. 0278-191-37
Near the City of San Bernardino, San Bernardino County, California

For Submittal to:

Land Use Services Department, Planning Division
County of San Bernardino
385 North Arrowhead Avenue
San Bernardino, CA 92415

Prepared for:

MIG
1650 Spruce Street, Suite 106
Riverside, CA 92507

Prepared by:

Michael Hogan, Principal Investigator
Deirdre Encarnación, Report Writer
CRM TECH
1016 East Cooley Drive, Suite A/B
Colton, CA 92324

April 5, 2021

CRM TECH Contract #3689P
Approximately 9.6 Acres
USGS San Bernardino South, Calif., 7.5' (1:24,000) Quadrangle
Portion of Rancho San Bernardino Land Grant; T1S R4W, San Bernardino Baseline and Meridian

EXECUTIVE SUMMARY

Between December 2020 and April 2021, at the request of MIG and Sixth Street Properties Sub Fund, LLC, CRM TECH performed a paleontological resource assessment on approximately 9.6 acres of former ranch land near the City of San Bernardino, San Bernardino County, California. The subject property of the study, Assessor's Parcel No. 0278-191-37, is located at 24662-24712 East 6th Street, on the northeast corner of 6th Street and Pedley Road, in a portion of the Rancho San Bernardino land grant lying within T1S R4W, San Bernardino Baseline and Meridian.

The study is part of the environmental review process for an industrial/commercial development project proposed by Sixth Street Properties Sub Fund, LLC, which entails primarily the construction of a 179,000-square-foot building with 169,000 square feet of warehouse space and 10,000 square feet of office space. The County of San Bernardino, as the lead agency for the project, required the study in compliance with the California Environmental Quality Act (CEQA). The purpose of the study is to provide the County with the necessary information and analysis to determine whether the proposed project would adversely affect any significant, nonrenewable paleontological resources, as required by CEQA, and to design a paleontological mitigation program, if necessary.

In order to identify any paleontological resource localities that may exist in or near the project area and to assess the possibility for such resources to be encountered during the project, CRM TECH initiated a paleontological records search, conducted a literature review, and carried out a systematic field survey of the project area. The results of these research procedures indicate that the proposed project's potential to impact significant paleontological resources appears to be low in the surficial Holocene-age alluvium but high in the Pleistocene-age sediments potentially present at great depths.

Based on these findings, CRM TECH recommends that a paleontological resource impact mitigation program be developed prior to commencement of ground-disturbing activities and implemented during construction to prevent potential impacts on significant, nonrenewable paleontological resources or reduce such impacts to a level less than significant. As the primary component of the mitigation program, all earth-moving operations reaching beyond the depth of ten feet, or at shallower depths upon encountering the paleontologically sensitive soils, should be monitored for any evidence of paleontological remains.

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INTRODUCTION

Between December 2020 and April 2021, at the request of MIG and Sixth Street Properties Sub Fund, LLC, CRM TECH performed a paleontological resource assessment on approximately 9.6 acres of former ranch land near the City of San Bernardino, San Bernardino County, California (Fig. 1). The subject property of the study, Assessor's Parcel No. 0278-191-37, is located at 24662-24712 East 6th Street, on the northeast corner of 6th Street and Pedley Road, in a portion of the Rancho San Bernardino land grant lying within T1S R4W, San Bernardino Baseline and Meridian (Figs. 2, 3).

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In order to identify any paleontological resource localities that may exist in or near the project area and to assess the possibility for such resources to be encountered during the project, CRM TECH initiated a paleontological records search, conducted a literature review, and carried out a systematic field survey of the project area. The following report is a complete account of the methods, results, and final conclusion of this study. Personnel who participated in the study are named in the appropriate sections below, and their qualifications are provided in Appendix 1.

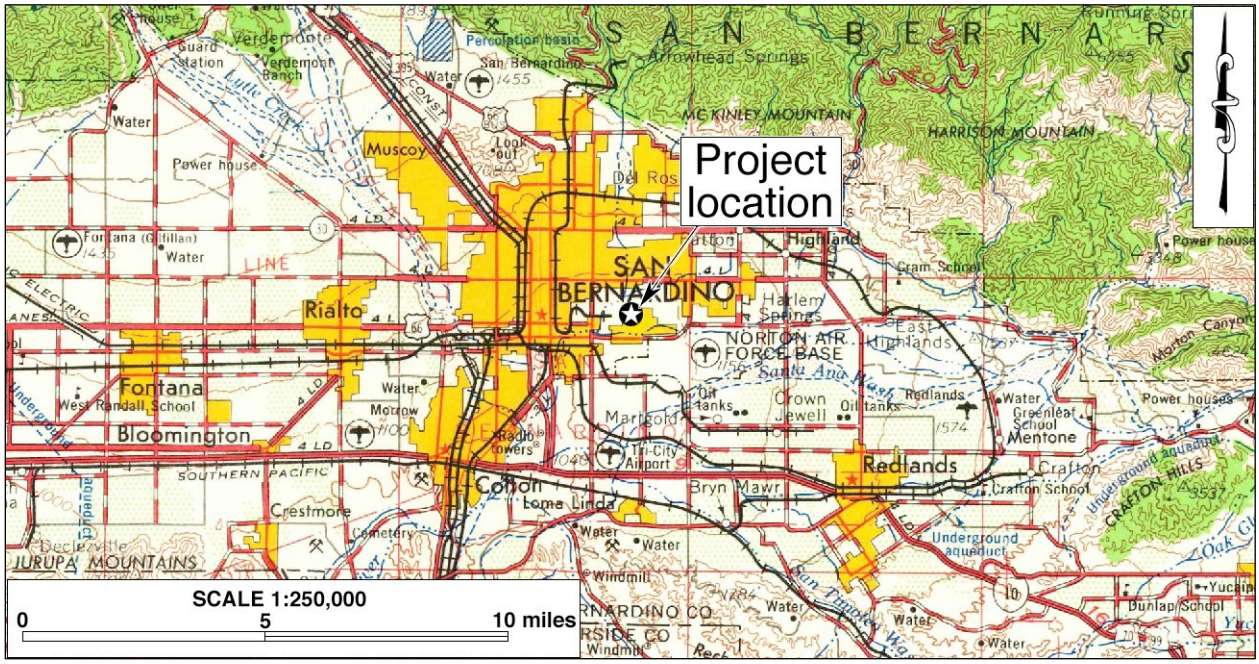

Figure 1. Project vicinity. (Based on USGS San Bernardino, Calif., 120'x60' quadrangle)

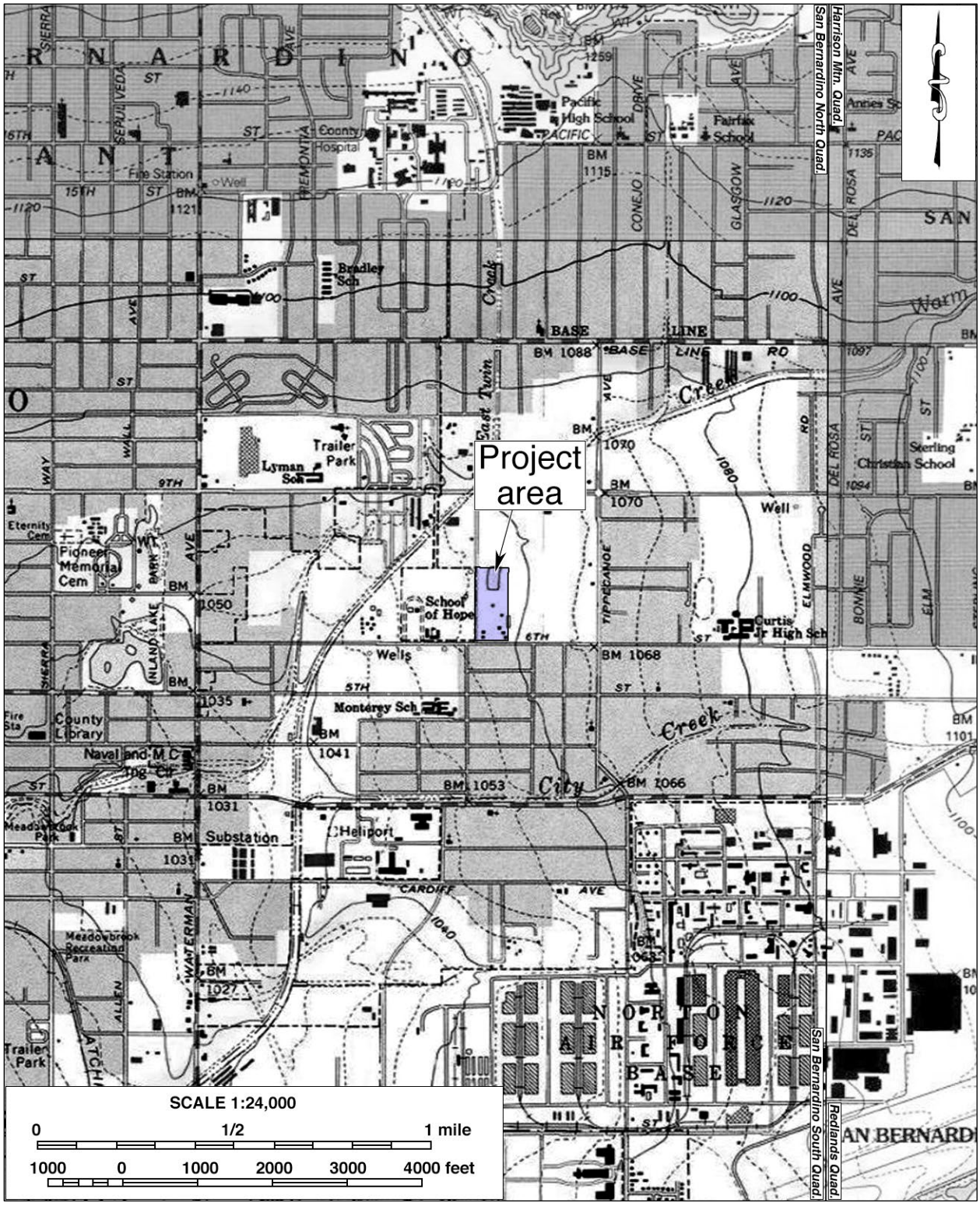

Figure 2. Project location. (Based on USGS Harrison Mtn., Redlands, San Bernardino North, and San Bernardino South, Calif., 7.5' quadrangles)

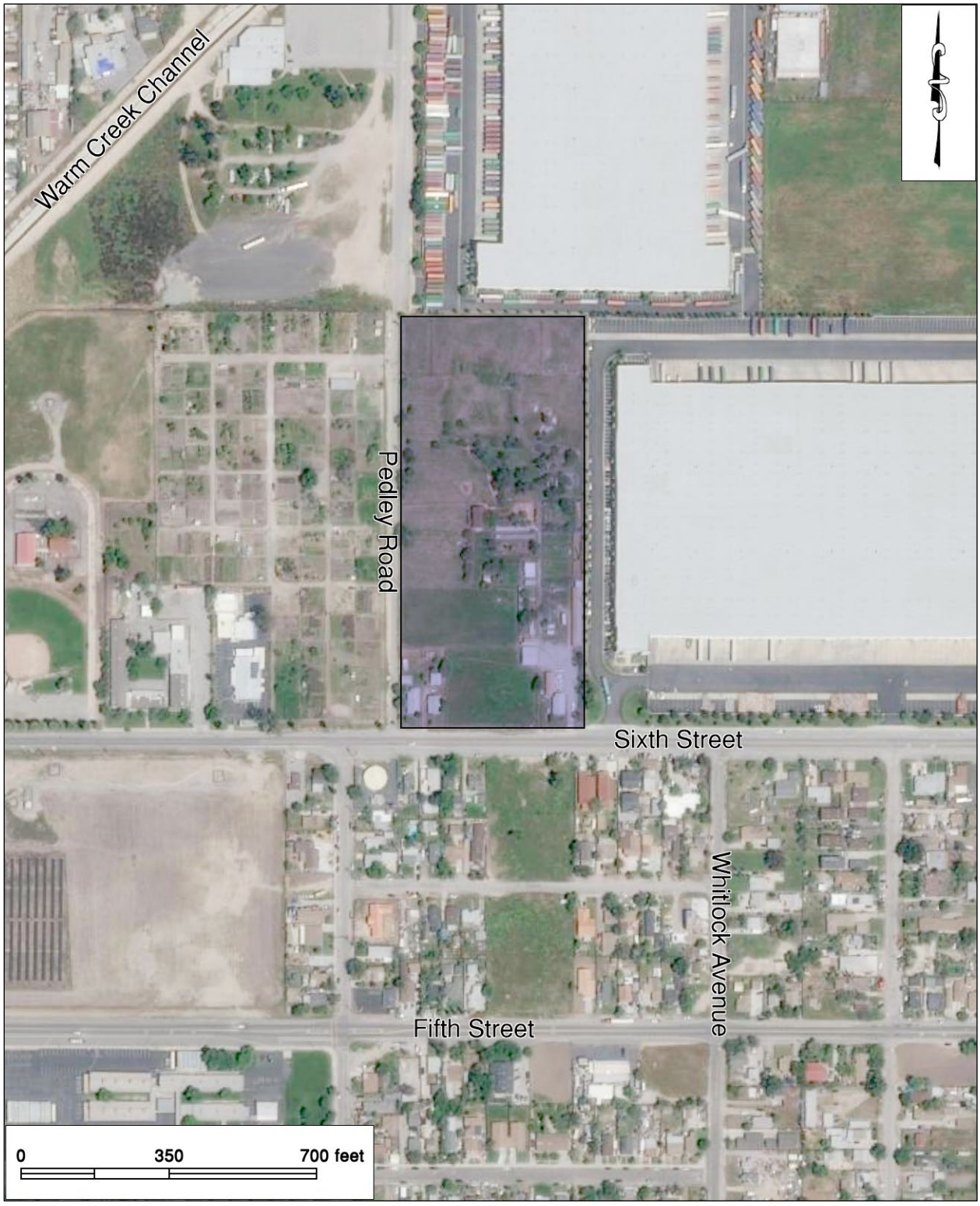

Figure 3. Aerial view of the project area.

PALEONTOLOGICAL RESOURCES

DEFINITION

Paleontological resources represent the remains of prehistoric life, exclusive of any human remains, and include the localities where fossils were collected as well as the sedimentary rock formations in which they were found. The defining character of fossils or fossil deposits is their geologic age, typically older than recorded human history and/or older than the middle Holocene Epoch, which dates to circa 5,000 radiocarbon years (Society of Vertebrate Paleontology 2010:11).

Common fossil remains include marine and freshwater mollusk shells; the bones and teeth of fish, amphibians, reptiles, and mammals; leaf imprint assemblages; and petrified wood. Fossil traces, another type of paleontological resource, include internal and external molds (impressions) and casts created by these organisms. These items can serve as important guides to the age of the rocks and sediments in which they are contained, and may prove useful in determining the temporal relationships between rock deposits from one area and those from another as well as the timing of geologic events. They can also provide information regarding evolutionary relationships, development trends, and environmental conditions.

Fossil resources generally occur only in areas of sedimentary rock (e.g., sandstone, siltstone, mudstone, claystone, or shale). Because of the infrequency of fossil preservation, fossils, particularly vertebrate fossils, are considered nonrenewable paleontological resources. Occasionally fossils may be exposed at the surface through the process of natural erosion or because of human disturbances; however, they generally lay buried beneath the surficial soils. Thus, the absence of fossils on the surface does not preclude the possibility of their being present within subsurface deposits, while the presence of fossils at the surface is often a good indication that more remains may be found in the subsurface.

SIGNIFICANCE CRITERIA

According to guidelines proposed by Eric Scott and Kathleen Springer (2003) of the San Bernardino County Museum, paleontological resources can be considered to be of significant scientific interest if they meet one or more of the following criteria:

1. The fossils provide information on the evolutionary relationships and developmental trends exhibited among organisms, living or extinct;
2. The fossils provide data useful in determining the age(s) of the rock unit or sedimentary stratum, including data important in determining the depositional history of the region and the timing of geologic events therein;
3. The fossils provide data regarding the development of biological communities or the interactions between paleobotanical and paleozoological biotas;
4. The fossils demonstrate unusual or spectacular circumstances in the history of life; and/or
5. The fossils are in short supply and/or in danger of being depleted or destroyed by the elements, vandalism, or commercial exploitation, and are not found in other geographic locations.

PALEONTOLOGICAL SENSITIVITY

The fossil record is unpredictable, and the preservation of organic remains is rare, requiring a particular sequence of events involving physical and biological factors. Skeletal tissue with a high percentage of mineral matter is the most readily preserved within the fossil record; soft tissues not intimately connected with the skeletal parts, however, are the least likely to be preserved (Raup and Stanley 1978). For this reason, the fossil record contains a biased selection not only of the types of organisms preserved but also of certain parts of the organisms themselves. As a consequence, paleontologists are unable to know with certainty, the quantity of fossils or the quality of their preservation that might be present within any given geologic unit.

Sedimentary units that are paleontologically sensitive are those geologic units (mappable rock formations) with a high potential to contain significant nonrenewable paleontological resources. More specifically, these are geologic units within which vertebrate fossils or significant invertebrate fossils have been determined by previous studies to be present or are likely to be present. These units include, but are not limited to, sedimentary formations that contain significant paleontological resources anywhere within their geographical extent as well as sedimentary rock units temporally or lithologically amenable to the preservation of fossils.

A geologic formation is defined as a stratigraphic unit identified by its lithic characteristics (e.g., grain size, texture, color, and mineral content) and stratigraphic position. There is a direct relationship between fossils and the geologic formations within which they are enclosed and, with sufficient knowledge of the geology and stratigraphy of a particular area, it is possible for paleontologists to reasonably determine the formation's potential to contain significant nonrenewable vertebrate, invertebrate, marine, or plant fossil remains.

The paleontological sensitivity for a geologic formation is determined by the potential for that formation to produce significant nonrenewable fossils. This determination is based on what fossil resources the particular geologic formation has produced in the past at other nearby locations. Determinations of paleontologic sensitivity must consider not only the potential for yielding vertebrate fossils but also the potential of yielding a few significant fossils that may provide new and significant taxonomic, phylogenetic, and/or stratigraphic data.

The Society of Vertebrate Paleontology issued a set of standard guidelines intended to assist paleontologists to assess and mitigate any adverse effects/impacts to nonrenewable paleontological resources. The guidelines defined four categories of paleontological sensitivity for geologic units that might be impacted by a proposed project, as listed below (Society of Vertebrate Paleontology 2010:1-2):

- **High Potential**: Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered.
- **Undetermined Potential**: Rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment.
- **Low Potential**: Rock units that are poorly represented by fossil specimens in institutional collections, or based on general scientific consensus 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.

SETTING

The City of San Bernardino is located in the Transverse Ranges Geomorphic Province of southern California, which consists of a series of steep east-west trending mountain ranges and valleys (Harden 2004:426). This east-west structure is in contrast to the usual coastal California northwest trend, hence the name "Transverse" (Jennings 1980). The Transverse Ranges Geomorphic Province extends west offshore to include the San Miguel, Santa Rosa, and Santa Cruz Islands, and the eastern end of the province is the San Bernardino Mountains (*ibid.*).

More specifically, the city lies in the eastern San Bernardino Valley, to the south of the San Bernardino Mountains. Alluvial fans associated with the San Bernardino Mountains stem from canyons along the southern margin of the mountains, including the canyons of City Creek and the Santa Ana River in the vicinity of the project area, which then in turn combine and cross to form an extremely complex alluvial-fan array (Morton and Miller 2006:70). Alluvial sediments from the Santa Ana River and Mill Creek systems dominate the alluvial deposits in the project vicinity, merging to the west with those created by the Cajon Wash and Lytle Creek systems (*ibid*.). The Lytle Creek system contributes sediments from both the western San Bernardino Mountains and the eastern San Gabriel Mountains.

The project location is in a formerly rural area just outside the San Bernardino city limits, which has been increasingly taking on commercial/industrial characteristics in recent decades,, partially due to its proximity to the San Bernardino International Airport (formerly Norton Air Force Base). The project area is bounded by Pedley Road on the west, Sixth Street on the south, and existing warehouses on the east and the north. Four residences, a stable, a large workshop, and various sheds stand in the southern portion of the property near Sixth Street (Figs. 3, 4). A large wooden canopy

Figure 4. Overview of the project area. (Photograph taken on February 4, 2021; view to the southeast)

stands near the center of the property, housing hay bales, wooden pallets, and farming equipment. Animal keeping hutches, pens, kennels, and wire cages are scattered across the eastern portion, along with wells with pumps, trailers, and wooden and metal crates.

Former pastures, divided into smaller areas by metal fences and trees, are found along the western project boundary. A southwest-northeast trending power transmission line bisects the property. Construction and animal-keeping activities in the past have greatly disturbed the ground surface. Today, the terrain is relatively level with the exception of a concrete-lined basin in the north-central portion of the property. Elevations range approximately around 1,058 to 1,065 feet above mean sea level. The existing vegetation consists primarily of a thick cover of mixed grasses and low-lying weeds with scattered pepper trees (Fig. 4).

METHODS AND PROCEDURES

RECORDS SEARCHES

The records search service for this study was provided by the San Bernardino County Museum (SBCM) in Redlands. The SBCM maintains files of regional paleontological localities as well as supporting maps and documents. The records search results were used to identify known previously performed paleontological resource assessments as well as known paleontological localities within a one-mile radius of the project area.

LITERATURE REVIEW

In conjunction with the records searches, CRM TECH report writer Deirdre Encarnación pursued a literature review on the project vicinity under the direction of CRM TECH geologist/paleontologist Harry M. Quinn, California Professional Geologist #3477. Sources consulted during the review include primarily topographic, geologic, and soil maps of the San Bernardino region, published geologic literature pertaining to the project location, and other materials in the CRM TECH library, including unpublished reports produced during similar surveys in the vicinity.

FIELD SURVEY

On February 4, 2021, CRM TECH field director Daniel Ballester and paleontological surveyor Nina Gallardo carried out the field survey of the project area under Harry M. Quinn's direction. The survey was conducted on foot by walking a series of parallel transects oriented east-west and spaced 15 meters (approximately 50 feet) apart. Where transects were impracticable, such as around the buildings, structures, and farm equipment, the field team stayed as close to the transect system as possible and examined the ground surface wherever it was exposed. In this way, the entire project area was systematically examined for any indications of paleontological remains and to verify the geological formations and the soil types. Ground visibility was generally poor (0-25%) over most of the property due to the presence of dense grasses but was good (70-80%) near the perimeter fences.

RESULTS AND FINDINGS

RECORDS SEARCHES

The SBCM finds the project area to be located upon Quaternary younger alluvial fan deposits of Holocene age (Cortez 2020:1; see App. 2). These sediments have a generally low potential to contain significant paleontological resources, but can overlay older, deeper Pleistocene fan deposits or alluvium, which are conducive to the preservation of fossil remains (*ibid*.). The Regional Paleontological Locality Inventory at the SBCM contains no known paleontological localities within or adjacent to project boundaries.

According to the SBCM, the closest known fossil locality was found four miles to the southwest in sediment lithologies similar to those that may occur at depth at the project location (Cortez 2020:1). Fossil *Tracheophyta* wood was recovered at that locality at the depths of roughly 437 to 725 feet below the ground surface in gray sands (*ibid*.:1). Based on this previous discovery, soils within the project area are assigned a low potential for containing significant, nonrenewable fossil resources at and just below the surface, but a high potential in the undisturbed Pleistocene deposits at significant depths (*ibid*.).

LITERATURE REVIEW

The surface geology in the project area was mapped in its entirety by Rogers (1967) as *Qal*, or Quaternary Alluvium of Recent age, defined as "stream, river channel, and alluvial fan deposits." Surficial sediments within the project area have also been mapped as Qya_1, described as "unconsolidated grayish sandy to pebbly alluvium" of Recent age (Morton 1978). Morton and Miller (2003) mapped the soils at the project location as entirely Qya_4, described as young axial-channel deposit of late Holocene age that "occupies inactive channels adjacent to Mill Creek and forms benches along Santa Ana River, City Creek, and Yucaipa Creek" (Morton and Miller 2006:85).

FIELD SURVEY

The field survey of the project area produced negative results for potential paleontological resources on the surface. Throughout the course of the field survey, no notable surface manifestation of any fossil remains was observed within the project area. While surface visibility was hampered by the presence of a vegetative ground cover, in light of the extent of past ground disturbances on the property, no intact fossil remains had been anticipated on the surface or in shallow deposits prior to the survey.

DISCUSSION

According to the research results summarized above, surface sediments in the project area consist of younger Quaternary alluvial deposits. These sediments are generally considered low in paleontological sensitivity, but they may be underlain at great depths by older sedimentary deposits that could contain significant vertebrate fossils. The SBCM reported one known fossil locality from

late Pleistocene deposits similar to those that may occur at depth within the project boundaries. Based on these findings, the surface soils in the project area are determined to be low in potential for containing significant, nonrenewable fossil resources, while the undisturbed subsurface deposits of older Quaternary-age potentially present at significant depth are assigned a high potential.

CONCLUSION AND RECOMMENDATIONS

CEQA guidelines (Title 14 CCR App. G, Sec. VII(f)) require that public agencies in the State of California determine whether a proposed project would "directly or indirectly destroy a unique paleontological resource" during the environmental review process. The present study, conducted in compliance with this provision, is designed to identify any significant, non-renewable paleontological resources that may exist within or adjacent to the project area, and to assess the possibility for such resources to be encountered in future excavation and construction activities.

In conclusion, the proposed project's potential to impact significant paleontological resources appears to be low in the Holocene-age alluvium on the surface but high in the subsurface deposit of Pleistocene-age sediments at significant depth. Therefore, CRM TECH recommends that a paleontological resource impact mitigation program be developed prior to commencement of ground-disturbing activities and implemented during construction to prevent potential impacts on significant, nonrenewable paleontological resources or reduce such impacts to a level less than significant. The mitigation program should be developed in accordance with the provisions of CEQA as well as the proposed guidelines of the Society of Vertebrate Paleontology (2010), and should include but not be limited to the following:

- All earth-moving operations reaching beyond the depth of 10 feet, or at shallower depths upon encountering the paleontologically sensitive soils, should be monitored for any evidence of significant, nonrenewable paleontological resources. The monitor should be prepared to quickly salvage fossils, if they are unearthed, to avoid construction delays, but must have the power to temporarily halt or divert construction equipment to allow for removal of abundant or large specimens.
- Samples of sediments should be collected and processed to recover small fossil remains.
- Recovered specimens should be identified and curated at a repository with permanent retrievable storage that would allow for further research in the future.
- A report of findings, including an itemized inventory of recovered specimens and a discussion of their significance when appropriate, should be prepared upon completion of the research procedures outlined above. The approval of the report and the inventory by the County of San Bernardino would signify completion of the mitigation program.

REFERENCES

Cortez, Crystal
2020 Paleontology Records Review: Proposed Starpoint Properties Project; Assessor's Parcel Number 0278-191-37 (CRM TECH Contract No. 3689P) in the City of San Bernardino, San Bernardino County, California. Records review letter report prepared by the San Bernardino County Museum, Division of Earth Sciences, Redlands, California.

Jennings, Olaf P.
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Morton, Douglas M.
1978 Preliminary Geologic Map of the San Bernardino South Quadrangle, San Bernardino and Riverside Counties, California. United States Geological Survey Open-file Report 78-20. Washington, D.C.
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2006 Preliminary Digital Geologic Map of the San Bernardino 30'x60' quadrangle, California: Geology and Description of Map Units, version1.0. United States Geological Survey Open-File Report 2006-1217. Digital preparation by P.M. Cossette and K.R. Bovard.
Raup, David M., and Steven M. Stanley
1978 *Principle of Paleontology*. W.H. Freeman and Company, San Francisco.
Rogers, Thomas H.
1967 Geological Map of California, San Bernardino Sheet (1:250,000). California Division of Mines and Geology, Sacramento.
Scott, Eric, and Kathleen Springer
2003 CEQA and Fossil Preservation in California. *Environmental Monitor* Fall:4-10. Association of Environmental Professionals, Sacramento, California.
Society of Vertebrate Paleontology
2010 Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. http://vertpaleo.org/Membership/Member-Resources/SVP_ Impact_Mitigation_Guidelines.aspx.

APPENDIX 1

PERSONNEL QUALIFICATIONS

PROJECT GEOLOGIST/PALEONTOLOGIST
Harry M. Quinn, M.S., California Professional Geologist #3477

Education

1968 M.S., Geology, University of Southern California, Los Angeles, California.
1964 B.S, Geology, Long Beach State College, Long Beach.
1962 A.A., Los Angeles Harbor College, Wilmington, California.

- Graduate work oriented toward invertebrate paleontology; M.S. thesis completed as a stratigraphic paleontology project on the Precambrian and Lower Cambrian rocks of Eastern California.

Professional Experience

2000- Project Paleontologist, CRM TECH, Riverside/Colton, California.
1998- Project Archaeologist, CRM TECH, Riverside/Colton, California.
1992-1998 Independent Geological/Geoarchaeological/Environmental Consultant, Pinyon Pines, California.
1994-1996 Environmental Geologist, E.C E.S., Inc, Redlands, California.
1988-1992 Project Geologist/Director of Environmental Services, STE, San Bernardino, California.
1987-1988 Senior Geologist, Jirsa Environmental Services, Norco, California.
1986 Consulting Petroleum Geologist, LOCO Exploration, Inc. Aurora, Colorado.
1978-1986 Senior Exploration Geologist, Tenneco Oil E & P, Englewood, Colorado.
1965-1978 Exploration and Development Geologist, Texaco, Inc., Los Angeles, California.

Previous Work Experience in Paleontology

1969-1973 Attended Texaco company-wide seminars designed to acquaint all paleontological laboratories with the capability of one another and the procedures of mutual assistance in solving correlation and paleo-environmental reconstruction problems.
1967-1968 Attended Texaco seminars on Carboniferous coral zonation techniques and Carboniferous smaller foraminifera zonation techniques for Alaska and Nevada.
1966-1972, 1974, 1975 Conducted stratigraphic section measuring and field paleontological identification in Alaska for stratigraphic controls. Pursued more detailed fossil identification in the paleontological laboratory to establish closer stratigraphic controls, mainly with Paleozoic and Mesozoic rocks and some Tertiary rocks, including both megafossil and microfossil identification, as well as fossil plant identification.
1965 Conducted stratigraphic section measuring and field paleontological identification in Nevada for stratigraphic controls. Pursued more detailed fossil identification in the paleontological laboratory to establish closer stratigraphic controls, mainly with Paleozoic rocks and some Mesozoic and Tertiary rocks. The Tertiary work included identification of ostracods from the Humboldt and Sheep Pass Formations and vertebrate and plant remains from Miocene alluvial sediments.

Memberships

Society of Vertebrate Paleontology; American Association of Petroleum Geologists; Association of Environmental Professionals; Rocky Mountain Association of Geologists, Pacific Section; Society of Economic Paleontologists and Mineralogists; San Bernardino County Museum.

Publications in Geology

Five publications in Geology concerning an oil field study, a ground water and earthquake study, a report on the geology of the Santa Rosa Mountain area, and papers on vertebrate and invertebrate Holocene Lake Cahuilla faunas.

REPORT WRITER
Deirdre Encarnación, M.A.

Education

2003	M.A., Anthropology, San Diego State University, California.
2000	B.A., Anthropology, minor in Biology, with honors; San Diego State University, California.
1993	A.A., Communications, Nassau Community College, Garden City, N.Y.
2001	Archaeological Field School, San Diego State University.
2000	Archaeological Field School, San Diego State University.

- Cross-trained in paleontological procedures and identifications by CRM TECH Geologist/Paleontologist Harry M. Quinn.

Professional Experience

2004-	Project Archaeologist/Report Writer, CRM TECH, Riverside/Colton, California.
2001-2003	Part-time Lecturer, San Diego State University, California.
2001	Research Assistant for Dr. Lynn Gamble, San Diego State University.
2001	Archaeological Collection Catalog, SDSU Foundation.

PALEONTOLOGICAL SURVEYOR/MONITOR
Nina Gallardo, B.A.

Education

2004 B.A., Anthropology/Law and Society, University of California, Riverside.

- Cross-trained in paleontological field procedures and identifications by CRM TECH Geologist/Paleontologist Harry M. Quinn.

Professional Experience

2004- Project Archaeologist, CRM TECH, Riverside/Colton, California.
- Surveys, excavations, monitoring; mapping; Native American consultation; records searches.

2004- Paleontological Surveyor/Monitor, CRM TECH, Riverside/Colton, California.
- Paleontological field surveys and monitoring; mapping of resources; fossil recovery; soil sample collection; stratigraphic profiles.

Cultural Resources Management Reports

Co-author of and contributor to numerous cultural resources management reports since 2004.

FIELD DIRECTOR/PALEONTOLOGICAL SURVEYOR
Daniel Ballester, M.S.

Education

2013	M.S., Geographic Information System (GIS), University of Redlands, California.
1998	B.A., Anthropology, California State University, San Bernardino.
1997	Archaeological Field School, University of Las Vegas and University of California, Riverside.
1994	University of Puerto Rico, Rio Piedras, Puerto Rico.

- Cross-trained in paleontological field procedures and identifications by CRM TECH Geologist/Paleontologist Harry M. Quinn.

Professional Experience

2002-	Field Director/GIS Specialist, CRM TECH, Riverside/Colton, California.
2011-2012	GIS Specialist for Caltrans District 8 Project, Garcia and Associates, San Anselmo, California.
2009-2010	Field Crew Chief, Garcia and Associates, San Anselmo, California.
2009-2010	Field Crew, ECorp, Redlands.
1999-2002	Project Archaeologist, CRM TECH, Riverside, California.
1998-1999	Field Crew, K.E.A. Environmental, San Diego, California.
1998	Field Crew, A.S.M. Affiliates, Encinitas, California.
1998	Field Crew, Archaeological Research Unit, University of California, Riverside

APPENDIX 2

RECORDS SEARCH RESULTS

2024 Orange Tree Lane, Redlands, CA 92374 | Phone: 909.798.8616 Fax: 909.307.0539

San Bernardino County Museum
Division of Earth Sciences

Crystal Cortez
Curator of Earth Sciences

email: Crystal.cortez@sbcm.sbcounty.org

16 December, 2020

CRM Tech
Attn: Nina Gallardo
1016 E. Cooley Drive, Suite B
Colton, CA 92324

PALEONTOLOGY RECORDS REVIEW Proposed Starpoint Properties Project; Assessor's Parcel Number 0278-191-37 (CRM TECH Contract No. 3689P) in the City of San Bernardino, San Bernardino County, California

Dear Nina,

The Division of Earth Sciences of the San Bernardino County Museum (SBCM) has completed a records search for the above-named project in San Bernardino County, California. The proposed Starpoint Properties Project; Assessor's Parcel Number 0278-191-37 (CRM TECH Contract No. 3689) in the County of San Bernardino, California located in the City of San Bernardino, as shown on the United States Geological Survey (USGS) 7.5 minute San Bernardino South, California quadrangle.

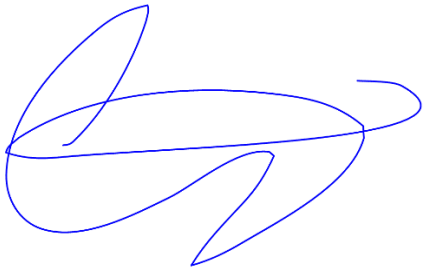
Geologic mapping of that region indicates that the proposed development is located on Quaternary younger alluvial fan deposits of Holocene (recent) age. These sediments have low potential to contain significant paleontological resources. However, these sediments may overlay older Pleistocene fan deposits or Pleistocene alluvium. These potentially-fossiliferous sediments were deposited between ~1.8 million years ago to ~11,000 years ago. Older Pleistocene deposits in the area have been found to be highly fossiliferous.

For this review, I conducted a search of the Regional Paleontological Locality Inventory (RPLI) at the SBCM. The results of this search indicate that no recorded paleontological resource localities are present within the proposed project. The nearest SBCM locality (SBCM 1.102.2) is located 4 miles South west of the site where *Tracheophyta* wood was discovered during a well project at ~437 and ~725 feet below the ground surface in gray sands.

This records search covers only the paleontological records of the San Bernardino County Museum. It is not intended to be a thorough paleontological survey of the proposed project area covering other institutional records, a literature survey, or any potential on-site survey.

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

Sincerely,



Crystal Cortez, Curator of Earth Sciences
Division of Earth Sciences
San Bernardino County Museum