
APPENDIX F3: EBPSP PALEONTOLOGICAL RESOURCES



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PALEONTOLOGICAL ASSESSMENT FOR THE EUCALYPTUS BUSINESS PARK SPECIFIC PLAN PROJECT

**CITY OF ONTARIO,
SAN BERNARDINO COUNTY, CALIFORNIA**

Prepared for:

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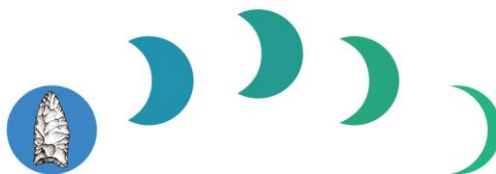
Submitted to:

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Planning Department
303 East B Street
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May 9, 2025; Revised July 14, 2025; Revised July 25, 2025



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Paleontological Database Information

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- Report Title:** Paleontological Assessment for the Eucalyptus Business Park Specific Plan Project, City of Ontario, San Bernardino County, California
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- Submitted to:** City of Ontario
Planning Department
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- USGS Quadrangle:** Township 2 South, Range 7 West, of the *Prado Dam* and *Corona North, California* (7.5-minute) USGS Quadrangles
- Study Area:** Approximately 300 acres
- Key Words:** Paleontological assessment; Pleistocene alluvial deposits; high paleontological resource sensitivity; full-time monitoring recommended.

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I. INTRODUCTION AND LOCATION

A paleontological resource assessment has been completed for the Eucalyptus Business Park Specific Plan Project, located in the city of Ontario, San Bernardino County, California (Figures 1 and 2). The project, located along the north side of Eucalyptus Avenue between Campus and Walker avenues, consists of approximately 300 acres and is situated within Township 2 South, Range 7 West, as shown on the United States Geological Survey 1:24,000-scale (7.5-minute) *Prado Dam* and *Corona North, California* topographic quadrangle maps (Figure 2). As designed, the applicant proposes the development of an approximately 140-acre business park with approximately 100 acres of developed parkland (approximately 36 acres within the project and 54 acres outside the project but within the limits of disturbance). In addition, project improvements include approximately 50 acres of off-site infrastructure, such as roadways and utilities. Currently, the project parcels are partly developed, with dairy and agricultural fields, and associated structures and infrastructure.

As the lead agency, the City of Ontario 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 for a previous project in the area, a review of the underlying geology, and recommendations to mitigate impacts to potential paleontological resources.

II. REGULATORY SETTING

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 the California Environmental Quality Act," as amended in December 2018 (California Code of Regulations [CCR] Title 14, Division 6, Chapter 3, Sections 15000 et seq.), procedures define the types of activities, persons, and public agencies required to comply with CEQA. Section 15063 of the CCR provides a process by which a lead agency may review a project's potential impact to the environment, determine whether the impacts are significant, and, if necessary, provide recommendations.

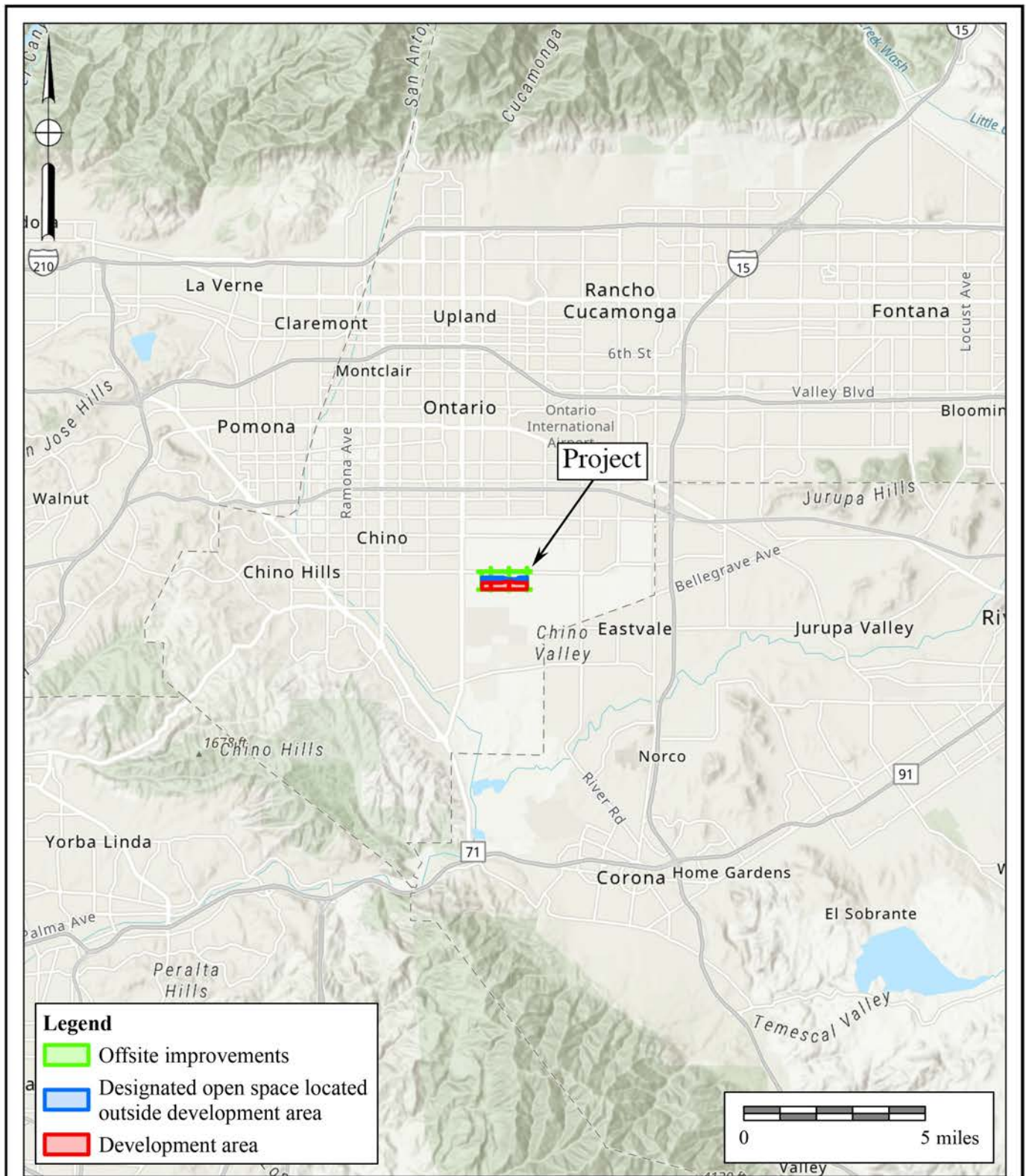


Figure 1
General Location Map

The Eucalyptus Business Park Specific Plan Project
 Esri World Topographic Map



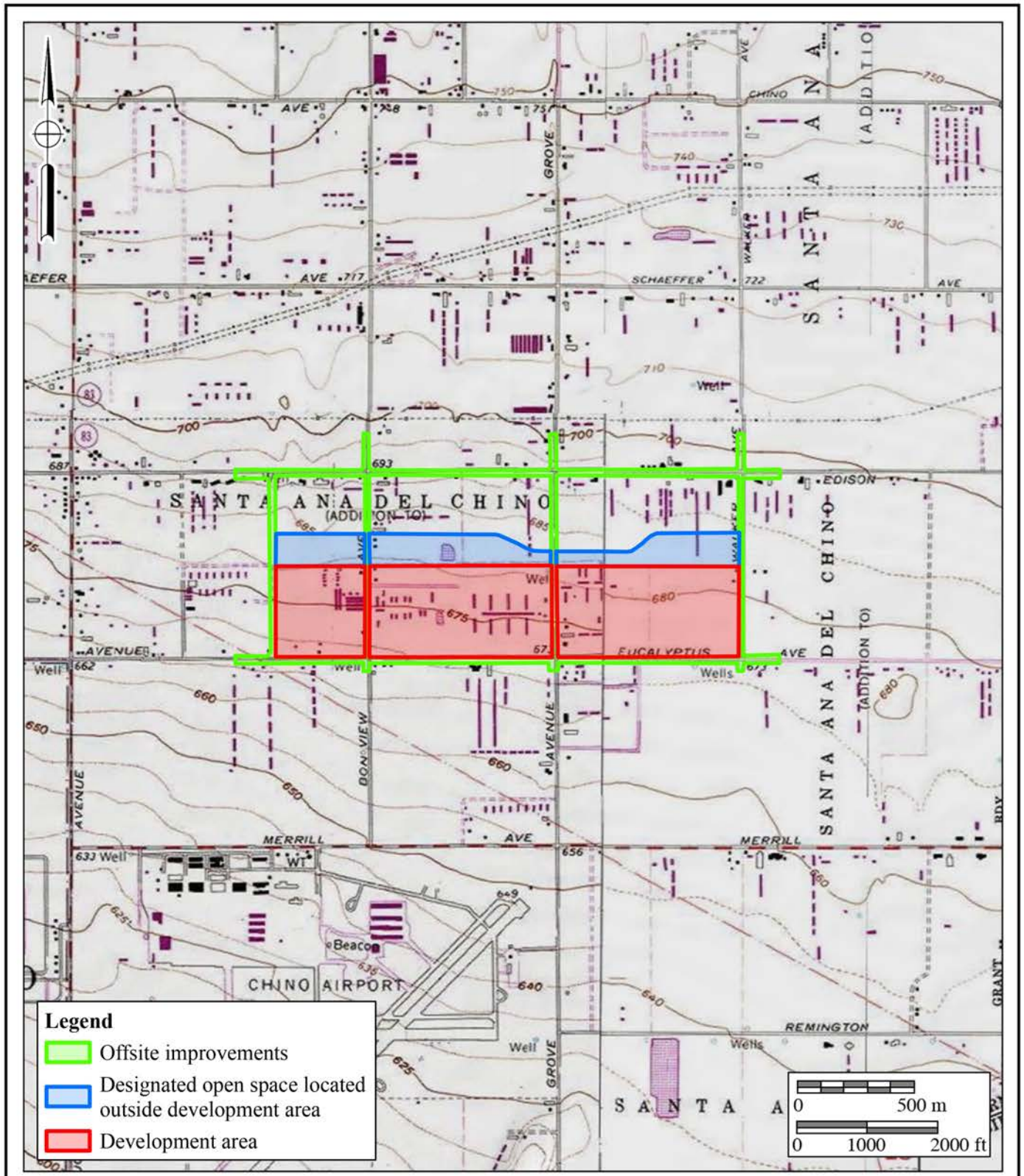


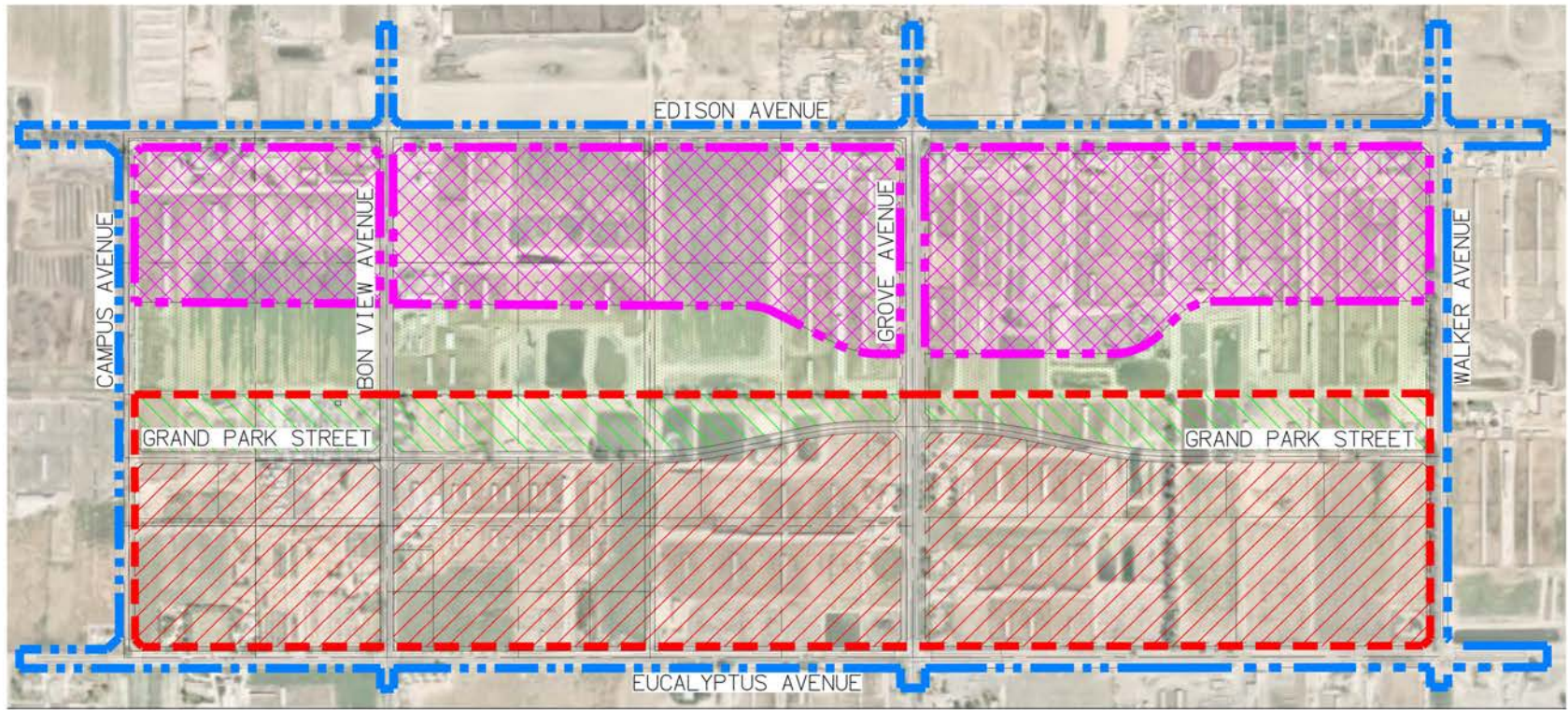
Figure 2

Project Location Map

The Eucalyptus Business Park Specific Plan Project

USGS Prado Dam, Corona North, Guasti, and Ontario Quadrangles (7.5-minute series)





LEGEND

- PROJECT LIMITS BOUNDARY - 190 AC
- OVERALL LIMITS OF DISTURBANCE BOUNDARY - 300 AC
- EXCLUDED FROM OVERALL LIMITS OF DISTURBANCE BOUNDARY
- BUSINESS PARK (WITHIN PROJECT LIMITS)
- OPEN SPACE (WITHIN PROJECT LIMITS)
- OPEN SPACE (NORTH OF PROJECT LIMITS)
- EXCLUDED FROM OVERALL LIMITS OF DISTURBANCE

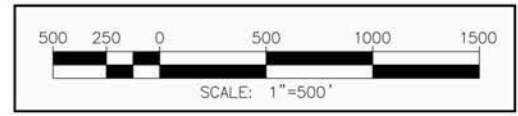


Figure 3
Project Development Map
 The Eucalyptus Business Park Specific Plan Project

In CEQA’s Environmental Checklist Form, a question to respond to 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, which is paraphrased below:

- 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 Ontario

The Ontario Plan (TOP) 2050 Final Supplemental Environmental Impact Report (FSEIR) sets forth goals and policies for the City to manage future growth and land uses. According to Impact 5.7-6 of the FSEIR:

Ontario is underlain by deposits of Quaternary and upper-Pleistocene sediments deposited during Pliocene and early Pleistocene time. Quaternary Older Alluvial sediments may contain significant, nonrenewable, paleontological resources and are therefore considered to have high sensitivity. Older Pleistocene alluvial sediments can yield fossil remains, often found at depths of 10 feet or more below existing ground surface. As previously discussed, for the Approved TOP, the San Bernardino County Museum, Division of Geological Sciences, conducted the paleontological records search and found one previously known paleontological resource locality recorded by the Regional Paleontologic Locality Inventory, a computer database with positional and contextual data for more than 3,000 fossil localities throughout California and the southwestern United States. This review found one paleontological locality for the City area (SBCM 5.1.8). This locality [at or near Champaign Avenue in eastern Ontario] yielded the remains of a mammoth from approximately 20 feet below the ground surface [Kottkamp 2022 indicates a depth of six feet for this locality]. As a result, the possibility of finding additional paleontological resources within City boundaries is moderate to

high at depths of 10 feet or more below ground surface. (PlaceWorks 2022a)

To mitigate the potential impacts identified in Impact 5.7-6, the FSEIR proposes the following mitigation measures. These measures are also stated in the Mitigation Monitoring and Reporting Program of TOP 2050 (PlaceWorks 2022a, 2022b):

Mitigation Measure MM 5-2: In areas of documented or inferred archaeological and/or paleontological resource presence, City staff shall require applicants for development permits to provide studies to document the presence/absence of such resources. On properties where resources are identified, such studies shall provide a detailed mitigation plan, including a monitoring program and recovery and/or in situ preservation plan, based on the recommendations of a qualified cultural preservation expert. The mitigation plan shall include the following requirements:

- a) Archaeologists and/or paleontologist shall be retained for the project and will be on call during grading and other significant ground-disturbing activities.
- b) Should any cultural resources be discovered, no further grading shall occur in the area of the discovery until the Planning Director or designee is satisfied that adequate provisions are in place to protect these resources.
- c) Unanticipated discoveries shall be evaluated for significance by a San Bernardino County Certified Professional Archaeologist/Paleontologist. If significance criteria are met, then the project shall be required to perform data recovery, professional identification, radiocarbon dates, and other special studies; submit materials to a museum for permanent curation; and provide a comprehensive final report including a catalog with museum numbers.

III. GEOLOGY

On the geologic map of the 1:100,000-scale San Bernardino-Santa Ana 30'x60' quadrangles (Figure 4, after Morton and Miller 2006), the project is located on the distal margins of the broad alluvial floodplain of the ancestral Santa Ana River. The project is mapped as middle Holocene-aged young sandy alluvial fan deposits (pale gray areas labeled “Qyf_{3a}” on

Figure 4). These young deposits overlie middle to late Pleistocene-aged very old sandy alluvial fan deposits, which are mapped at the surface south of the project.

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) 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).

Fossil Locality Records Search

A paleontological literature review and collections and locality records search was conducted for the project using records obtained for prior projects from the Division of Geological Sciences at the San Bernardino County Museum (SBCM) and the Western Science Center (WSC) in Hemet, and data from published and unpublished paleontological literature. The nearest known documented fossil localities are situated about a mile northeast of the project, containing several isolated fossil bones of camels (*Camelops* sp.) and a mastodon (*Mammuth pacificus*) rib fragment (SBCM localities 5.1.23 to 5.1.27; Kottkamp 2022). Kottkamp (2022) indicates that the deposits mapped at the surface of this area are unlikely to yield fossils, but the underlying, older deposits “have been found to be highly fossiliferous in the local area.”

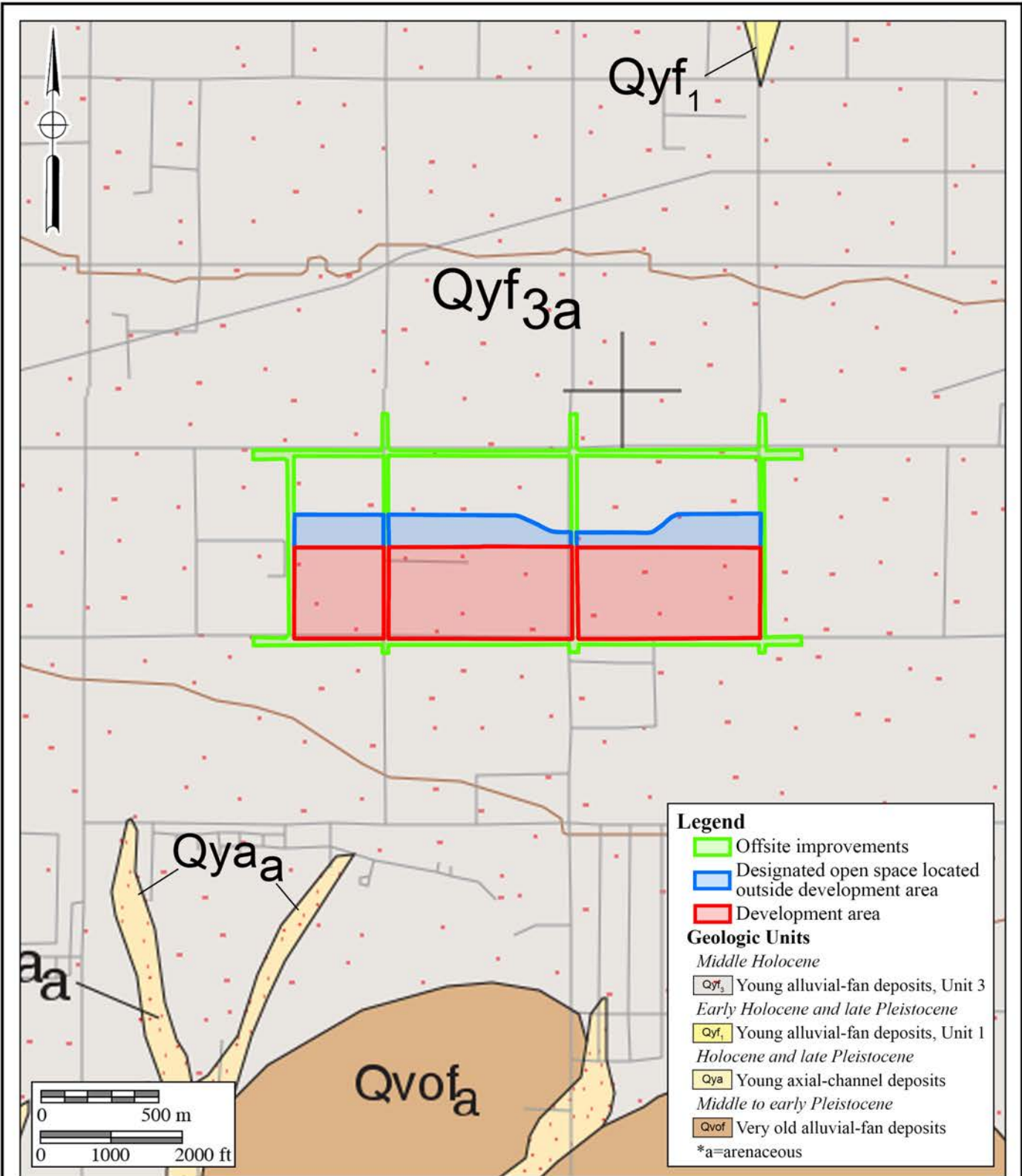


Figure 4
Geologic Map

The Eucalyptus Business Park Specific Plan Project

Geology after Morton and Miller (2006)



Several fossil localities are situated just south of the project, north of the Chino Airport, as a result of continuing paleontological monitoring for multiple projects by BFSAs Environmental Services, a Perennial Company (BFSAs), in this area of Ontario. At the ongoing Ontario Ranch Business Center Project, late Pleistocene-aged mammal bones have been collected from six localities, ranging from nine to 19 feet deep. These localities were found less than a half mile away, southwest of the current project and have yet to be prepared and curated at a museum. BFSAs discovered a large, fragmentary limb bone from an herbivore, as well as freshwater clams and snails from the mile-wide Merrill Commerce Center Project, located to the south of the project, across Eucalyptus Avenue. The bone was recovered from approximately 12 feet deep, while the mollusks were found from approximately 18 to 25 feet deep. More freshwater mollusks were discovered along Kimball Avenue in Chino, a mile and a half south of the current project, from approximately 10 feet deep at the Altitude Business Centre Project. At the Ontario 432 Project, just over a mile to east-southeast of the current project, the sacrum from a large artiodactyl and other unidentified mammalian remains were discovered, at depths ranging from five to seven feet. These specimens have been deposited at the WSC (Wirths 2021). All of these fossil localities are Pleistocene in age. It should be noted that all of these discoveries post-date the research materials used for paleontological resources in the FSEIR (PlaceWorks 2022a) and therefore, the document can be construed as out-of-date in that regard.

Project Survey

On April 29, 30 and May 2, 2025, BFSAs staff, under the supervision of Principal Investigator Todd Wirths, conducted an intuitive survey of the property and the entire limits of disturbance as indicated on Figures 2, 3, and 4, to determine if any paleontological resources were visible. The field methodology employed for the review included walking evenly spaced survey transects set approximately 10 to 15 meters apart while visually inspecting the ground surface, when possible. All potentially sensitive areas where paleontological resources might be located were closely inspected. Ground visibility of the business park and open space areas of the proposed project was limited due to active dairy operations, dense vegetation, development, pavement, and gravel. The entire property appears to have been previously rough-graded, including the off-site improvement areas. As a result of the field survey, multiple structures were identified within the property consisting of residences, garages, shade structures, dairy facilities, and other ancillary structures. No bedrock outcrops were exposed that might indicate the presence of fossils. No paleontological resources, or evidence of paleontological resources, were observed during the survey.

V. PALEONTOLOGICAL SENSITIVITY

Overview

The degree of paleontological sensitivity of any particular area is based upon 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 may 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 thus is typically assigned a low paleontological sensitivity. Pleistocene (over 11,700 years old) alluvial and alluvial fan deposits in the Inland Empire, however, often yield important terrestrial vertebrate fossils such as extinct mammoths, mastodons, and giant ground sloths, as well as extinct species of horse, bison, camel, saber-toothed cats, and others (Jefferson 1991). These Pleistocene sediments are thus accorded a high paleontological resource sensitivity.

Professional Standards

The Society of Vertebrate Paleontology (2010) has drafted guidelines that include four categories of paleontological sensitivity for geologic units (formations) that might be impacted by a proposed project, and are summarized below:

- 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, and further study is needed to determine the potential of the rock unit.
- Low Potential: 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 upon nearby fossil localities in southern and eastern Ontario and the mapped geology, the young alluvial fan deposits at the project may be considered to have a low potential for paleontological resources. However, with increasing depth and associated age, this potential increases to a high potential for yielding significant paleontological resources.

City of Ontario Assessment of Paleontological Sensitivity

The City of Ontario considers strata at depths of 10 feet or greater as having a moderate to high paleontological sensitivity. As such, the potential to uncover undiscovered paleontological resources is considered high (PlaceWorks 2022a: 5.7-17).

VI. CONCLUSIONS AND RECOMMENDATIONS

Potentially fossiliferous late Pleistocene alluvial fan deposits likely occur at a shallow depth below the project. These deposits underlie the Holocene young alluvial fan deposits mapped at the surface (“Qyf_{3a}” on Figure 4). The occurrence of terrestrial vertebrate fossils at shallow depths from Pleistocene alluvial fan sediments in Ontario 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 alluvial fan sediments to mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources.

On the basis of these statements, a Paleontological Resources Impact Mitigation Program (PRIMP) is recommended, in accordance with Mitigation Measure 5-2 of the City of Ontario (PlaceWorks 2022a, 2022b). The PRIMP shall be approved by the Planning Department of the City of Ontario prior to the issuance of the project’s grading permit. Based upon these findings, full-time monitoring starting at a depth of four feet below the surface during earth disturbance activities is strongly recommended. A proposed paleontological monitoring plan is detailed below. When implemented with the provisions of CEQA, the City of Ontario (PlaceWorks 2022a, 2022b), and the guidelines of the Society of Vertebrate Paleontology (2010), this paleontological monitoring plan would mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources (fossils), if present, to a level below significant.

Paleontological Monitoring Plan

1. All mitigation programs shall be performed by a qualified professional (project) paleontologist, defined as an individual with an M.S. or Ph.D. in paleontology or geology who has proven experience and who is knowledgeable in professional paleontological procedures and techniques. Fieldwork may be conducted by a qualified paleontological monitor, defined as an individual who has experience in the collection and salvage of fossil materials. The paleontological monitor shall always work under the direction of a qualified paleontologist.
2. Monitoring of mass grading and excavation activities shall be performed by a qualified paleontologist or paleontological monitor. Starting at a depth of four feet, monitoring will be conducted full-time in areas of grading or excavation in

- undisturbed sediments. Monitoring of artificial fill is not required.
3. 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.
 4. 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 from the affected area 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 upon 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.
 5. Paleontological salvage during trenching and boring activities is typically from the generated spoils and does not delay the trenching or drilling activities. Fossils will be collected and placed in cardboard flats or plastic buckets and identified by field number, collector, and date collected. Notes will be taken on the map location and stratigraphy of the site, which will be photographed before it is vacated, and the fossils are removed to a safe place. On mass grading projects, discovered fossil sites will be protected by flagging to prevent them from being overrun by earthmovers (scrapers) before salvage begins. Fossils will be collected in a similar manner, with notes and photographs being taken before removing the fossils. The precise location of the site is determined with the use of electronic handheld devices. 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 move the jacket to a safe location.
 6. Isolated fossils will be collected by hand, wrapped in protective materials, and placed in temporary collecting flats or five-gallon buckets. Notes will be taken on the map location and stratigraphy of the site, which will be photographed before it is vacated, and the fossils are moved to a safe place.
 7. 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.

8. In accordance with the “Microfossil Salvage” section of the SVP 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. If indicators of potential microvertebrate fossils are found, screening of a test sample (approximately 600 pounds) is recommended, according to the SVP guidelines. If feasible, wet screening shall be conducted on the project site. If screening yields significant fossils, then removing and processing a “standard sample” of 6,000 pounds shall be performed. If the test sample screening does not yield significant fossils, the standard sample screening is not performed.
9. In the laboratory, individual fossils will be cleaned of extraneous matrix, any breaks will be repaired, and the specimen, if needed, will be stabilized by soaking in an archivally approved acrylic hardener (*e.g.*, a solution of acetone and Paraloid B-72).
10. Recovered specimens will be 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.
11. Recovered specimens will be identified and curated into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage (*e.g.*, the San Bernardino County Museum). The paleontological program should include a written repository agreement prior to the initiation of mitigation activities. Prior to curation, the lead agency (the City of Ontario) will be consulted on the repository/museum to receive the fossil material.
12. 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 location(s). The report, when submitted to and accepted by the City of Ontario, 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. CERTIFICATION

I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this paleontological report, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief and have been compiled in accordance with CEQA criteria.



May 9, 2025; Revised July 14, 2025; Revised July 25, 2025

Todd A. Wirths, M.S., P.G.

Date

Principal Paleontologist

California Professional Geologist No. 7588

VIII. REFERENCES

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APPENDIX A

Qualifications of Key Personnel

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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 hydrocarbon-impacted 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.