Appendix F Paleontological Resources Assessment Report

Appendix

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PALEONTOLOGICAL RESOURCES ASSESSMENT REPORT

TUSTIN UNIFIED SCHOOL DISTRICT EDUCATION CENTER PROJECT

City of Tustin
Orange County, California

For Submittal to:

Tustin Unified School District
1302 Service Road
Tustin, CA 92780

Prepared for:

HANA Resources
20361 Hermana Circle
Lake Forest, CA 92630

Prepared by:

Ron C. Schmidtling, Principal Paleontologist
Elizabeth Beckner, Report Writer
CRM TECH
1016 E. Cooley Drive, Suite A/B
Colton, CA 92324

Michael Hogan, Principal Investigator
Bai Tang, Principal Investigator

June 29, 2025
Revised September 4, 2025

Approximately nine acres
USGS Tustin, Calif., 7.5' quadrangle
Tract 46, T5S R9W, San Bernardino Baseline and Meridian
CRM TECH Project No. 4252P

EXECUTIVE SUMMARY

Between March and June 2025, at the request of HANA Resources, CRM TECH performed a paleontological resource assessment on approximately nine acres of undeveloped land in the City of Tustin, Orange County, California. The subject property of the study is located at the southwest corner of Legacy Road and Valencia Avenue, within the former boundaries of the decommissioned Marine Corps Air Station Tustin. It comprises a portion of Tract 46, Township 5 South, Range 9 West, San Bernardino Baseline and Meridian, as depicted in the United States Geological Survey Tustin, California, 7.5' quadrangle.

The study is a part of the environmental review process for the proposed construction of offices and outdoor event space for the Tustin Unified School District (TUSD). As the lead agency for the project, the TUSD required the study in compliance with the California Environmental Quality Act (CEQA). The purpose of the study is to provide the TUSD 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 probability for such resources to be encountered during the project, CRM TECH initiated a records search at the appropriate repository, conducted a literature review, and carried out a systematic field survey of the project area. The results of these research procedures indicate no known fossil localities within the project area or a one-mile radius but suggest that the younger surface soils in the vicinity lie upon Pleistocene alluvial fan deposits that are known to be fossiliferous. Therefore, the project's potential to impact significant, nonrenewable paleontological resources appears to be low in the surface soils but high in the Pleistocene sediments occurring at unknown depths.

Based on these findings, CRM TECH recommends that a paleontological resource impact mitigation program be developed and implemented during the project to prevent impacts on significant, nonrenewable paleontological resources or reduce the impacts to a level less than significant. As a part of the mitigation program, earth-moving operations reaching beyond the previously disturbed surface soils, generally three feet in depth, should be monitored periodically by a qualified paleontological monitor to ensure the timely identification of potentially fossil-bearing sediments when they are encountered. Once potentially fossiliferous sediments are exposed, all further earth-moving operations will need to be monitored continuously. Under these conditions, CRM TECH further recommends that the proposed project may be cleared to proceed in compliance with CEQA provisions on paleontological resources.

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INTRODUCTION

Between March and June 2025, at the request of HANA Resources, CRM TECH performed a paleontological resource assessment on approximately nine acres of undeveloped land in the City of Tustin, Orange County, California (Fig. 1). The subject property of the study is located at the southwest corner of Legacy Road and Valencia Avenue, within the former boundaries of the decommissioned Marine Corps Air Station (MCAS) Tustin. It comprises a portion of Tract 46, Township 5 South, Range 9 West, San Bernardino Baseline and Meridian, as depicted in the United States Geological Survey (USGS) Tustin, California, 7.5' quadrangle (Figs. 2, 3).

The study is a part of the environmental review process for the proposed construction of offices and outdoor event space for the Tustin Unified School District (TUSD). As the lead agency for the project, the TUSD required the study in compliance with the California Environmental Quality Act (CEQA; PRC §21000, et seq.). The purpose of the study is to provide the TUSD 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 probability for such resources to be encountered during the project, CRM TECH initiated a records search at the appropriate repository, 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.

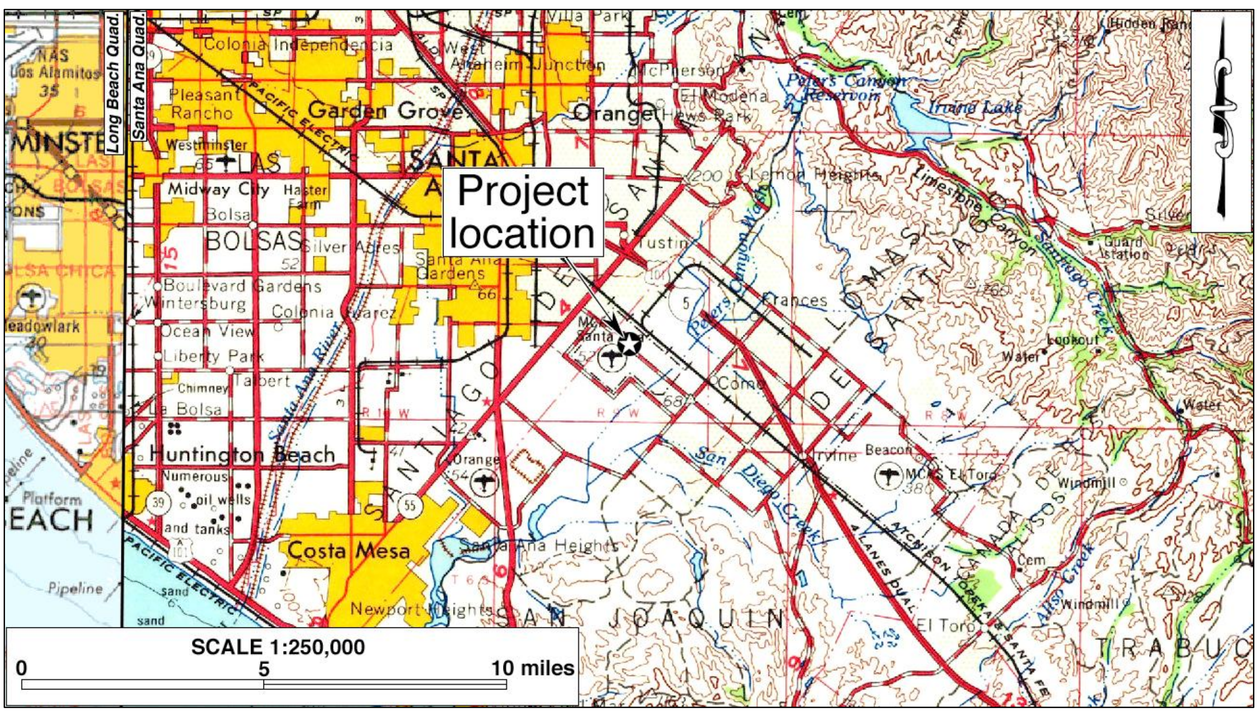

Figure 1. Project vicinity. (Based on USGS Long Beach and Santa Ana, Calif., 120'x60' quadrangles,1978/1979 edition)

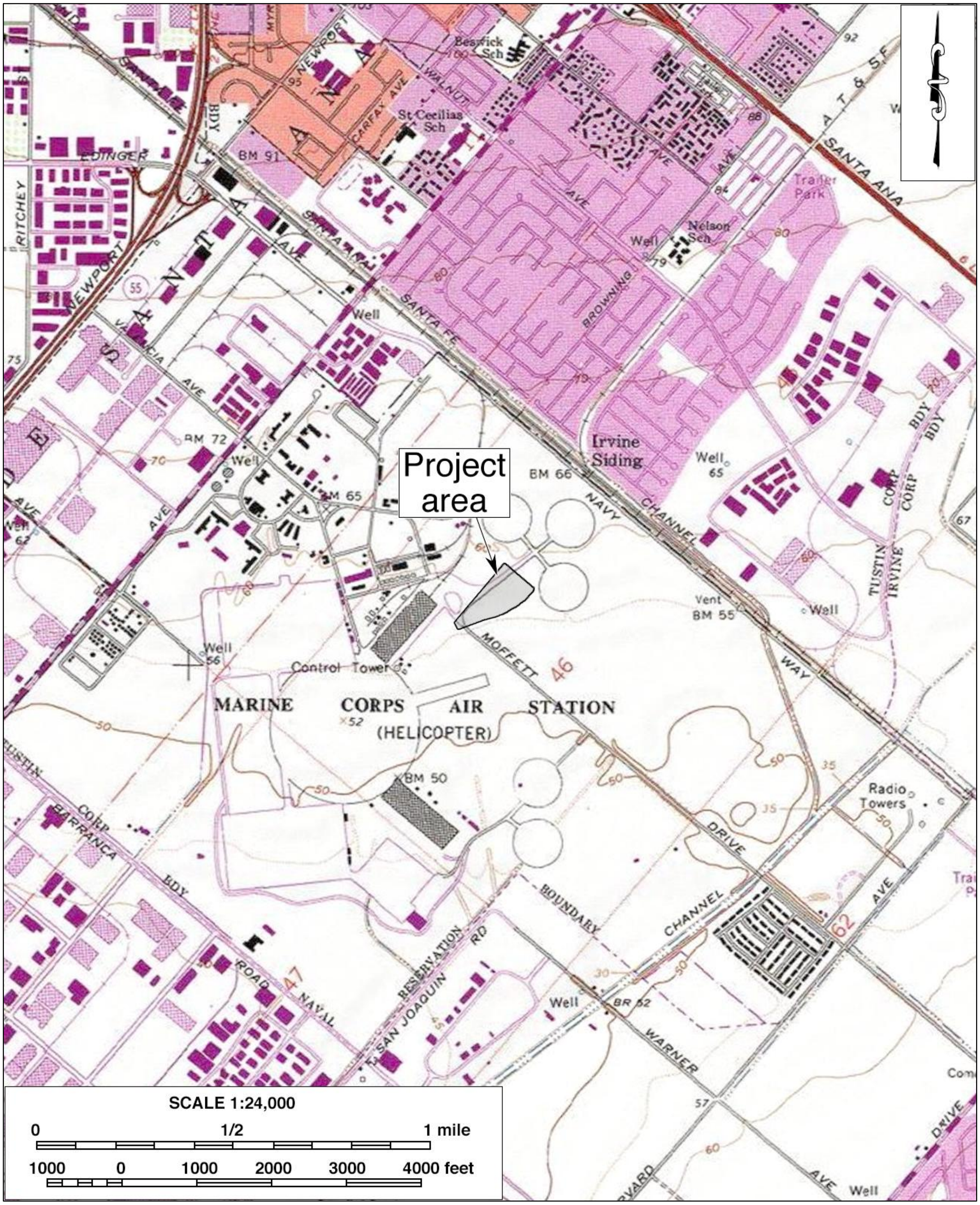

Figure 2. Project location. (Based on USGS Tustin, Calif., 7.5' quadrangle, 1981 edition).

Figure 3. Recent satellite image of the project area.

PALEONTOLOGICAL RESOURCES

The following section presents an overview of common paleontological resource types, along with criteria used in assessing resource significance and paleontological sensitivity.

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. Trace fossils, another type of paleontological resource, include internal and external molds (impressions) and casts, such as footprints, 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 Scott and Springer (2003:6), 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 to yield a large collection of fossil remains but also the potential to yield a few fossils that can 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

REGIONAL GEOLOGY

The City of Tustin is situated on the southeastern rim of the Los Angeles Basin, a structural basin that, according to most sources, lies at the northwestern end of the Peninsular Ranges province, which at its deepest point is filled by more than 30,000 feet of middle Miocene and younger sedimentary rock (Yerkes et al. 1965:A4; Jenkins 1980:40-41). Norris and Webb (1976:170) also place the portion of the Los Angeles Basin around the project location in the Peninsular Ranges province. Harden (2004:435), however, considers the Los Angeles Basin to be more closely related to the Transverse Ranges province than the Peninsular Ranges province, while Harms (1996:150-151) considers the basin to be so different geologically from both the Peninsular and Transverse Ranges provinces as to constitute a separate province.

Yerkes et al. (1965:A5) show the Los Angeles Basin to be bounded on the north by the Transverse Ranges and on the east by the Chino-Elsinore Fault and the Santa Ana Mountains while extending westward under the Pacific Ocean. The basin is divided into four well-defined structural blocks by the Santa Monica-Raymond Hill-Cucamonga Faults, the Whittier-Elsinore Faults and the Newport-Inglewood Fault (Yerkes et al. 1965:A5; Harms 1996:151). Harden (2004:435) also divides the Los Angeles Basin into four individual structural blocks, but bases the divisions on the Palos Verdes Fault, the Newport-Inglewood Fault, and the Whittier-Elsinore Fault Systems.

CURRENT ENVIRONMENTAL SETTING

Situated in the southwestern portion of the City of Tustin, the project area is surrounded by residential neighborhoods and commercial buildings to the northeast, the Legacy Magnet Academy to the south, and remaining structures of the decommissioned MCAS Tustin to the west (Figs. 3). Within the project area, there is a stockpile of soil that spans the length of the project area as well as several soil mounds near the southern and northern boundaries, likely spoils from recent construction nearby. Elevations on the property range around 55 feet above mean sea level. In its native state, the project area would be a part of the California Coastal Scrub Plant Community, but vegetation observed includes primarily invasive species such as foxtails and black mustard (Fig. 4).

METHODS AND PROCEDURES

RECORDS SEARCHES

The paleontological records search service for this study was provided by the Natural History Museum of Los Angeles County (NHMLA) in Los Angeles, which 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. A copy of the records search results is attached to this report in Appendix 2.

Figure 4. Typical landscape in the project area. Photograph taken on May 9, 2025; view to the southwest.

LITERATURE REVIEW

In conjunction with the records search, CRM TECH report writer Elizabeth Beckner reviewed geological literature pertaining to the project vicinity under the direction of principal paleontologist Ron C. Schmidtling. Sources consulted during the review include primarily topographic, geologic, and soil maps of the Tustin area, published geologic literature pertaining to the project location, aerial and satellite images available at the Nationwide Environmental Title Research (NETR) Online website and through Google Earth software, and other materials in the CRM TECH library, including unpublished reports produced during similar surveys in the vicinity.

FIELD SURVEY

On May 9, 2025, CRM TECH paleontological surveyor Melissa Portilla carried out the field survey of the project area under the direction of Ron Schmidtling. The survey was completed on foot at an intensive level by walking a series of parallel transects oriented northeast-southwest and spaced 15 meters (approximately 50 feet) apart. In this way, the ground surface in the entire project area was systematically and closely examined to determine soil types, verify the geological formations, and search for indications of paleontological remains. Ground visibility was generally poor (5-10%) in much of the project area due to either thick vegetation or the presence of soil stockpiles (Fig. 4). In light of the extent of past ground disturbances in the vicinity, however, the visibility level was not considered a major hindrance to the survey effort.

RESULTS AND FINDINGS

RECORDS SEARCHES

The records search results provided by the NHMLA identified no paleontological localities within the project area or within a one-mile radius but indicated the presence of such localities discovered elsewhere in southern California in sediment lithologies similar to those known to occur at the project location (Bell 2025; see App. 2). These localities have produced fossil remains that include rodent and sheep but also marine specimens such as school shark, eagle ray, goby, midshipmen, croaker, flatfish, cusk-eel, skate, angelshark, and sculpin from Quaternary deposits, as well as a dugong clade and sloth from the Vaqueros Formation.

The locations of these known fossil localities range from as close as the former Marine Corps Air Station El Toro in Irvine to as distant as Huntington Beach (*ibid*.). Although two of the fossil localities were recovered from unknown depths, two were recovered at 25 feet and 150-350 feet below ground surface, which far exceeds typical depths required for building construction. According to the NHMLA, potentially fossil-bearing soil units are present within the project area either at the surface or subsurface and, therefore, a full paleontological assessment was warranted (*ibid*.).

LITERATURE REVIEW

The surface geology in the project area was mapped by Rogers (1965) as *Qal*, or alluvium of recent age. Morton and Miller (2006) mapped the surface geology in the project area as Qyf_{sa} (Fig. 5), which is described as young alluvial-fan deposits that consist of "slightly to moderately consolidated silt, sand, and coarse-grained sand to bouldery alluvial-fan deposits having moderately dissected surfaces," dating to the early Holocene and late Pleistocene. Both of these geologic maps confirm the presence of younger sediments on the surface in the immediate vicinity of the project area.

Wachtell (1978:Map Sheet 10) mapped the surface soils in the project area as 140 (Chino silty clay loam, drained; 0 to 2 percent slopes). This soil type belongs to the Chino Series and consists of "somewhat poorly drained soils on alluvial fans" (*ibid.:*20). Also typical of the Chino Series is a 24-inch gray silty clay loam surface layer, with the underlying material extending to a depth of 60 inches or more and consisting of "grayish brown, gray, and light gray silty clay loam in places mottled with light brownish gray" (*ibid.*).

Historical aerial and satellite images indicate that the ground surface in and around the project area has been extensively disturbed since at least the 1940s, when the forerunner of MCAS Tustin was established. During the mid- and late 20th century, the project area was partially occupied by two of the main roads of the MCAS, while the rest of the property was covered by lawn grass (NETR Online 1946-2022; Google Earth 1994-2025). After the closure of the base in 1999, the entire project area was cleared in 2016-2017, although no further development has occurred (*ibid*.).

FIELD SURVEY

The field survey produced negative results for potential paleontological resources, and no fossilized faunal or floral remains were observed on the surface. Field observations confirmed that the ground

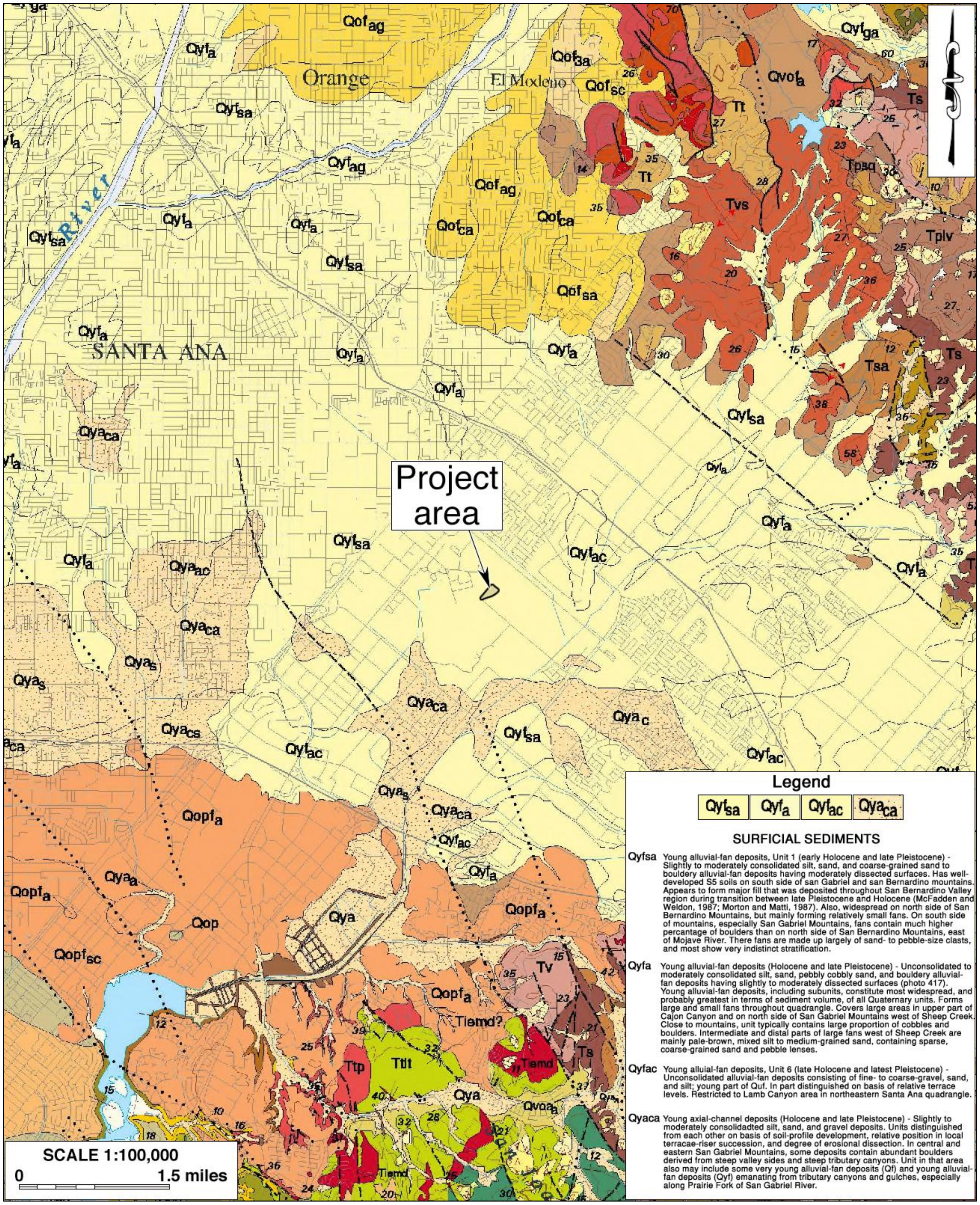

Figure 5. Geological map of the project area and vicinity. (Source: Morton and Miller 2006)

surface in the project area had been disturbed in the past, most recently in relation to nearby construction activities, with little vestige of the natural landscape remaining today (Fig. 4).

CONCLUSION AND RECOMMENDATIONS

CEQA guidelines (Title 14 CCR App. G, Sec. V(c)) 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.

Based on the research results presented above, no fossil localities have been identified within the project area or a one-mile radius, but the younger surface soils in the vicinity evidently lie upon Pleistocene alluvial fan deposits that are known to be fossiliferous. Therefore, the project's potential to impact significant, nonrenewable paleontological resources appears to be low in the surface soils but high in the Pleistocene sediments occurring at unknown depths. Based on these findings, CRM TECH recommends that a paleontological resource impact mitigation program be developed and implemented during the project to prevent impacts on significant, nonrenewable paleontological resources or reduce the impacts to a level less than significant. The mitigation program should be developed in accordance with the provisions of CEQA (Scott and Springer 2003) as well as the proposed guidelines of the Society of Vertebrate Paleontology (2010) and should include but not be limited to the following:

- Earth-moving operations reaching beyond the previously disturbed surface soils, generally three feet in depth, should be monitored periodically, or "spot-checked," by a qualified paleontological monitor to ensure the timely identification of potentially fossil-bearing sediments. The frequency of the field visits by the paleontological monitor will be dictated by the pace of the project and on-site assessment of the exposed sediments observed during each visit.
- Once potentially fossil-bearing sediments are exposed, continuous monitoring will become necessary. The monitor should be prepared to quickly salvage fossils, if they are unearthed, to avoid construction delays, but must be authorized to temporarily halt or divert construction equipment to allow for removal of abundant or large specimens.
- During continuous monitoring in the paleontologically sensitive sediments, 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 TUSD would signify completion of the mitigation program.

Under this condition, CRM TECH further recommends that the proposed project may be cleared to proceed in compliance with CEQA provisions on paleontological resources.

REFERENCES

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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.

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APPENDIX 1
PERSONNEL QUALIFICATIONS

PRINCIPAL PALEONTOLOGIST
Ron Schmidtling, M.S.

Education

1995	M.S., Geology, University of California, Los Angeles.
1991	Pasadena City College, Pasadena, California.
1985	B.A., Archaeology, Paleontology, Ancient Folklore, and Art History, University of Southern Mississippi, Hattiesburg.

Professional Experience:

2020-	Principal Paleontologist, CRM TECH, Colton, California.
2014-	Instructor of Earth Science, History of Life, Ecology, and Evolutionary Biology, Columbia College Hollywood, Reseda, California.
2013, 2015	Volunteer, excavation of a camarasaur and a diplodocid in southern Utah, Natural History Museum of Los Angeles County, California.
1993-2014	Consultant, Getty Conservation Institute, Brentwood, California. • Geological Consultant on the Renaissance Bronze Project, characterizing constituents of bronze core material; • Paleontological Consultant for Antiquities/Conservation, identifying the foraminifera and mineral constituents of a limestone torso of Aphrodite; • Scientific Consultant on the Brentwood Site Building Project, testing building materials for their suitability in the museum galleries.
1999-2001	Archaeological and Paleontological Monitor, Michael Brandman Associates, Irvine, California.
1997	Department of Archaeology, University of California, Los Angeles.
1994	Scientific Illustrator and Teaching Assistant, Department of Earth and Space Sciences and Department of Biological Sciences, University of California, Los Angeles.

Memberships

AAPS (Association of Applied Paleontological Sciences), USA; CSEOL (Center for the Study of Evolution and the Origin of Life), Department of Earth Sciences, University of California, Los Angeles.

Publications and Reports

Author, co-author, and contributor on numerous paleontological publications and paleontological resource management reports.

REPORT WRITER
Elizabeth L. Beckner, Ph.D.

Education

2024	Ph.D., Anthropology, University of California, Riverside.
2017	M.A., Anthropology, University of California, Riverside.
2016	B.A., Anthropology, University of California, Riverside.

Professional Experience

2024-	Project Archaeologist, CRM TECH, Colton, California.
2024-	Lecturer, California State University, San Bernardino.
2019-	Adjunct Instructor, Chaffey College, Rancho Cucamonga, California.
2019	Archaeologist, Dudek, Pasadena, California
2017-2019	Teaching Assistant, University of California, Riverside.
2018	Archaeologist, Proyecto Sacbé Cobá-Yaxuna (Sacbé Cobá-Yaxuna Project), Cobá, Quintana Roo, Mexico.
2016-2017	Field Assistant, Proyecto de Interacción Política del Centro de Yucatán (Political Interaction Project of Central Yucatan), Yaxuna, Yucatan, Mexico.
2015-2017	Information Officer, Eastern Information Center, Riverside, California.

Publication

2023	T.W. Stanton, Traci Ardren, Nicolas C. Barth, Juan C. Fernandez Diaz, Steph J. Miller, Karl A. Taube, Patrick Rohrer, Elizabeth Beckner;, and Aline Magnoni: Roads, Temples, and the Community Boundaries of Cobá, Quintana Roo. In T.H. Guderjan and J.P. Mathews (eds.): *Construction of Maya Space: Causeways, Walls, and Open Areas from Ancient to Modern Times*; pp. 71-98. University of Arizona Press, Tucson.

PALEONTOLOGICAL SURVEYOR
Melissa A. Portilla, B.A.

Education

2023	A.A. (*cum laude*), Anthropology, Fullerton College.
2019	B.A., Ancient History: Classics, University of Hawaii, Manoa.

Professional Experience

2023-	Project Archaeologist, CRM TECH, Colton, California.
2023-2024	Project Archaeologist, Psomas, Pasadena, California.
2020-2020	Collections Assistant, Museum of Us, San Diego, California.

APPENDIX 2

RECORDS SEARCH RESULTS

Natural History Museum
of Los Angeles County
900 Exposition Boulevard
Los Angeles, CA 90007

tel 213.763.DINO
www.nhm.org

NATURAL HISTORY MUSEUM LOS ANGELES COUNTY

Research & Collections

e-mail: paleorecords@nhm.org

March 30, 2025

CRM TECH
Attn: Eulices Lopez

re: Paleontological resources records search for the Tustin USD District Offices Project (CRM TECH No. 4252P)

Dear Eulices:

I have conducted a thorough search of our paleontology collection records for the locality and specimen data for proposed development at the Tustin USD District Offices project area as outlined on the portion of the Tustin USGS topographic quadrangle map that you sent to me via e-mail on March 24, 2025. 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 may 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 (NHMLA).

Locality Number	Location	Formation	Taxa	Depth
LACM VP 7867	Former El Toro Marine Base	Unknown formation (Pleistocene)	Rodent (rodentia)	25 feet bgs
LACM VP 7712-7713	City of Irvine south of I-405 & northeast of Sand Canyon Reservoir	Vaqueros Formation (fine-grained siltstone)	Dugong clade (Dugongidae), sloth (Mylodontidae?)	Unknown
LACM VP 1652	Rio Vista Avenue south of Lincoln Avenue	Alluvium (Pleistocene)	Sheep (*Ovis*)	Unknown (excavations for housing project)

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Locality Number	Location	Formation	Taxa	Depth
LACM VP 7657-7659	Ellis Avenue & Patterson Lane, Huntington Beach	Unknown Formation (Pleistocene; gray siltstone)	School shark (*Galeorhinus*), eagle ray (*Myliobatus*), goby (*Lepidogobius, Leptocottus*), midshipmen (*Porichthys*), croaker (*Seriphus*), flatfish (*Citharichthys*), cusk-eel (*Otophidium*), skate (*Raja*), angelshark (*Squatina*), sculpin (Cottidae)	150 - 350 ft bgs

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

This records search covers only the records of the NHMLA. It is not intended as a paleontological assessment of the project area for the purposes of CEQA or NEPA. Potentially fossil-bearing units are present in the project area, either at the surface or in the subsurface. As such, NHMLA recommends that a full paleontological assessment of the project area be conducted by a paleontologist meeting Federal (43 Code of Federal Regulations Part 49.110) or Society of Vertebrate Paleontology standards.

Sincerely,

Alyssa Bell

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