

PALEONTOLOGICAL ASSESSMENT FOR THE ROY ROGERS DRIVE PROJECT

CITY OF VICTORVILLE,
SAN BERNARDINO COUNTY, CALIFORNIA

PSUB25-00017
APNs 3106-201-20, -21, and a portion of -22

Prepared on Behalf of:

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June 9, 2025



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Paleontological Database Information

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- Assessor's Parcel Numbers:*** 3106-201-20, -21, and a portion of -22
- USGS Quadrangle:*** Section 17, Township 5 North, Range 4 West, *Victorville, California* (7.5-minute) Quadrangle
- Study Area:*** 3.42 acres
- Key Words:*** Paleontological assessment; City of Victorville; alluvium of the ancestral Mojave River; high sensitivity; monitoring recommended.

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I. INTRODUCTION AND LOCATION

A paleontological resource assessment has been completed for the Roy Rogers Drive Project, located north of Roy Rogers Drive and south of Midtown Drive, just west of Interstate Freeway 15, in the city of Victorville, San Bernardino County, California (Figure 1). The 3.42-acre project consists of three parcels, Assessor's Parcel Numbers (APNs) 3106-201-20, -21, and a portion of -22. On the United States Geological Survey (USGS) 1:24,000-scale *Victorville, California* (7.5-minute) topographic quadrangle map, the project is situated within Section 17, Township 5 North, Range 4 West (Figure 2). The project property is currently undeveloped.

The project plans call for the development of a farm and construction heavy equipment dealership, with an office building, enclosed outdoor display, parking, and other infrastructure. Access will be by driveways through easements between Midtown and Roy Rogers drives (Figure 3). The City's project number attached to the project is PSUB25-00017.

As the lead agency, the City of Victorville has required the preparation of a paleontological assessment to evaluate the project's potential to yield paleontological resources. The paleontological assessment of the project included a review of paleontological literature and fossil locality records in the area, a review of the underlying geology, and recommendations to mitigate impacts to potential paleontological resources, if necessary.

II. REGULATORY SETTING

The California Environmental Quality Act (CEQA), which is patterned after the National Environmental Policy Act, is the overriding regulation that sets the requirement for protecting California's cultural and paleontological resources. CEQA does not establish specific rules that must be followed but 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, whether the impacts are significant, and provide recommendations, if necessary.

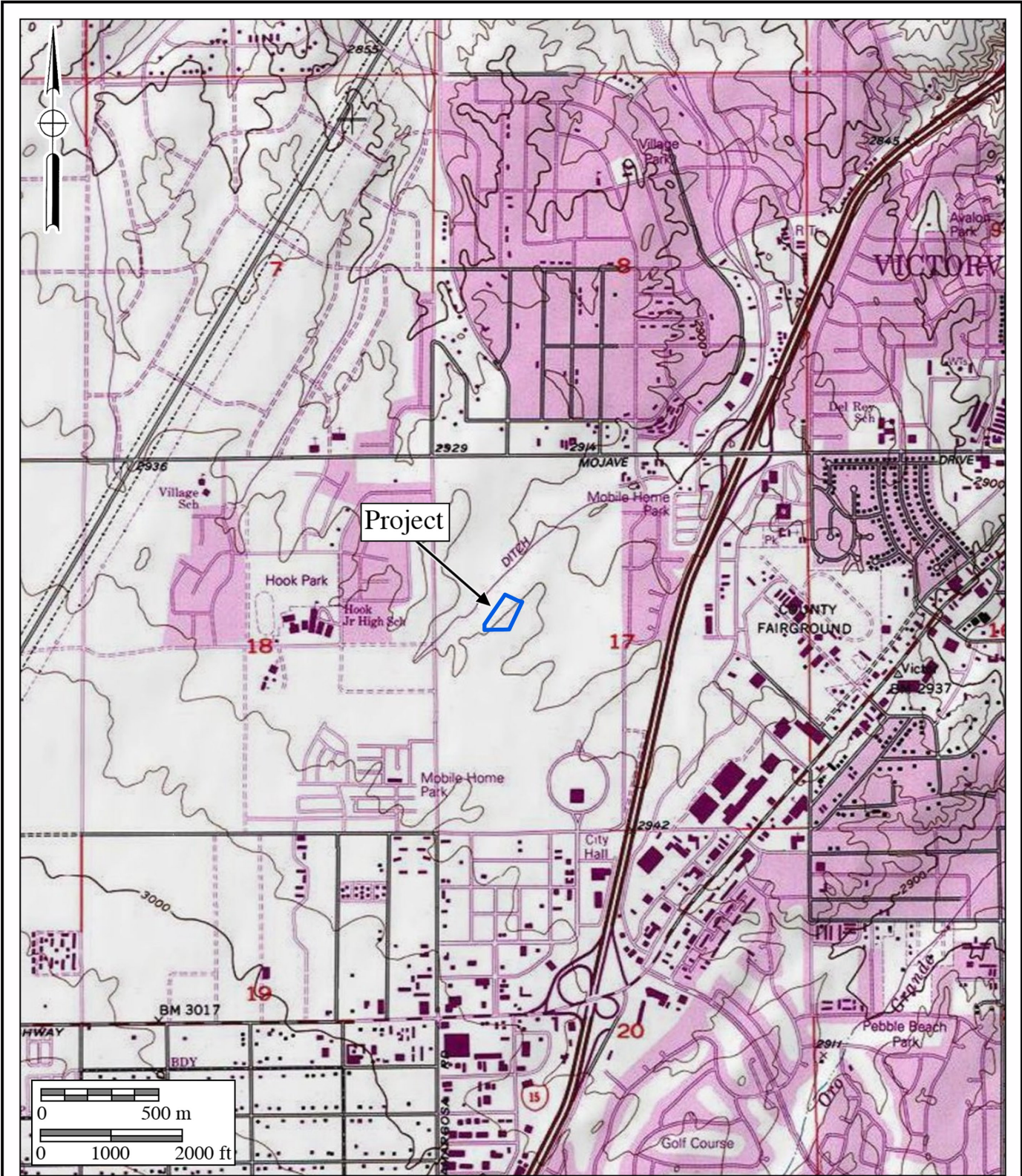


Figure 2
Project Location Map
 The Roy Rogers Drive Project

USGS *Victorville* and *Hesperia* Quadrangles (7.5-minute series)



Site Data Summary

Building Summary:

Tractor Supply:
 Indoor: ~23,957 SF
 Outdoor: ~20,000 SF

Existing Zoning: Commercial (C-2)
 Jurisdiction: City of Victorville

Area Summary:

Tractor Supply: 3.42 AC (148,812 SF)
 Parcel ID: 310620120, 310620121,
 310620122, 310620129

Vehicular Parking Summary:

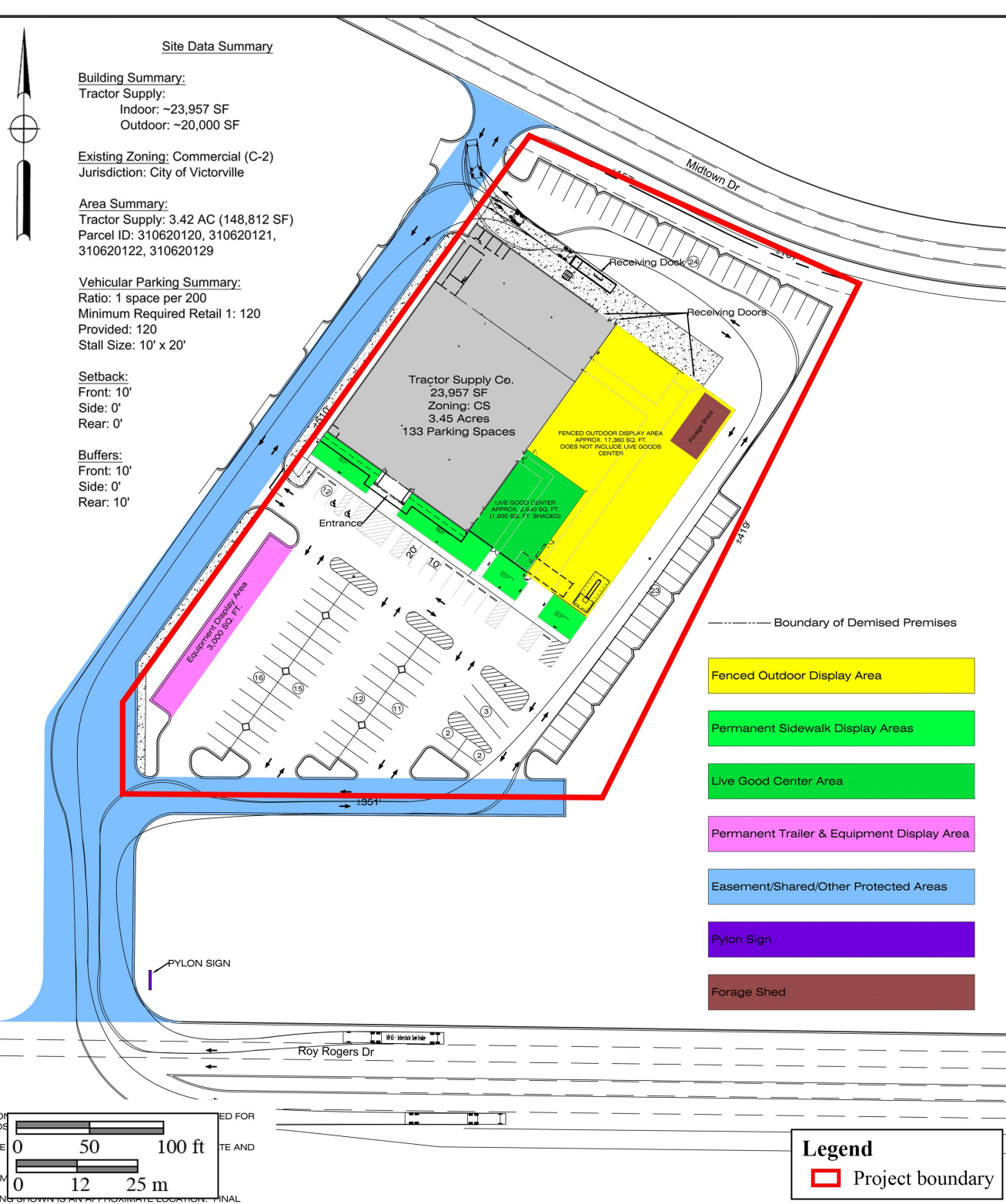
Ratio: 1 space per 200
 Minimum Required Retail 1: 120
 Provided: 120
 Stall Size: 10' x 20'

Setback:

Front: 10'
 Side: 0'
 Rear: 0'

Buffers:

Front: 10'
 Side: 0'
 Rear: 10'



----- Boundary of Demised Premises

- Fenced Outdoor Display Area
- Permanent Sidewalk Display Areas
- Live Good Center Area
- Permanent Trailer & Equipment Display Area
- Easement/Shared/Other Protected Areas
- Pylon Sign
- Forage Shed

Legend
 Project boundary

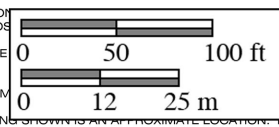


Figure 3
Site Plan
 The Roy Rogers Drive Project

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 Victorville

In the Final Environmental Impact Report (EIR) of the City of Victorville General Plan, paleontological resource mitigation measures are specified in CUL-1. For previously undeveloped properties greater than one acre, mitigation measure CUL-1 must be implemented before construction starts (City of Victorville 2008a). The measure is as follows:

CUL-1: The applicant shall provide for an on-site paleontological/archaeological inspector to monitor all grading operations, or a letter from said licensed professional indicating that monitoring is not necessary during grading. Further, if disturbed resources are required to be collected and preserved, the applicant shall be required to participate financially up to the limits imposed by Public Resources Code Section 21083.2. The results of said monitoring shall be filed with the Development Director or his designee prior to the final approval of the development. (City of Victorville 2008a)

III. GEOLOGY

The project is situated in the Victorville Basin, a structural depression about 40 kilometers wide and filled with sediments up to 1,300 meters thick, a succession of deposits ranging in age from middle Miocene to late Pleistocene time. The Victorville Basin is bordered by the San Gabriel and San Bernardino mountains to the south and, along the north, local peaks and ridges of pre-Cenozoic basement rocks in the areas of Quartzite Mountain and the southeastern Shadow

Mountains (local hills not to be confused with the more-prominent Shadow Mountains near the California-Nevada border). These deposits record the erosional and depositional cycles of the region during episodes of crustal slip along the San Andreas Fault, along with the coeval uplift and transrotation of the San Bernardino and San Gabriel mountains. A major feature of the area is the evolution of the northward-flowing ancestral Mojave River (Cox et al. 2003).

Geologically, the project is mapped within the Pleistocene and Pliocene-aged “alluvium of the ancestral Mojave River” (Figure 4, after Hernandez et al. 2008), composed of loose to well-consolidated, yellowish gray to light-yellowish-brown sand, silt, and pebble-cobble gravel. The current configuration of the Mojave River has developed gradually over a span of at least one million years. About 60 to 70 thousand years ago, the ancestral Mojave River began incising its modern canyon between Victorville and Barstow. The upper unit of the ancient Mojave River depositional sequence is approximately middle Pleistocene in age, based upon terrestrial vertebrate fossils (Cox et al. 2003).

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 of this report).

Fossil Locality Search

A prior paleontological resource locality search was performed for a nearby project by the Division of Earth Sciences at the San Bernardino County Museum (SBCM) (Kottkamp 2024). The locality search indicated that there are no fossil localities within the current project property. The nearest Pleistocene locality, which includes extinct horse remains, appears to be between two and three miles northeast of the project in ancient Mojave River deposits (SBCM locality number [loc.] 1.114.203).

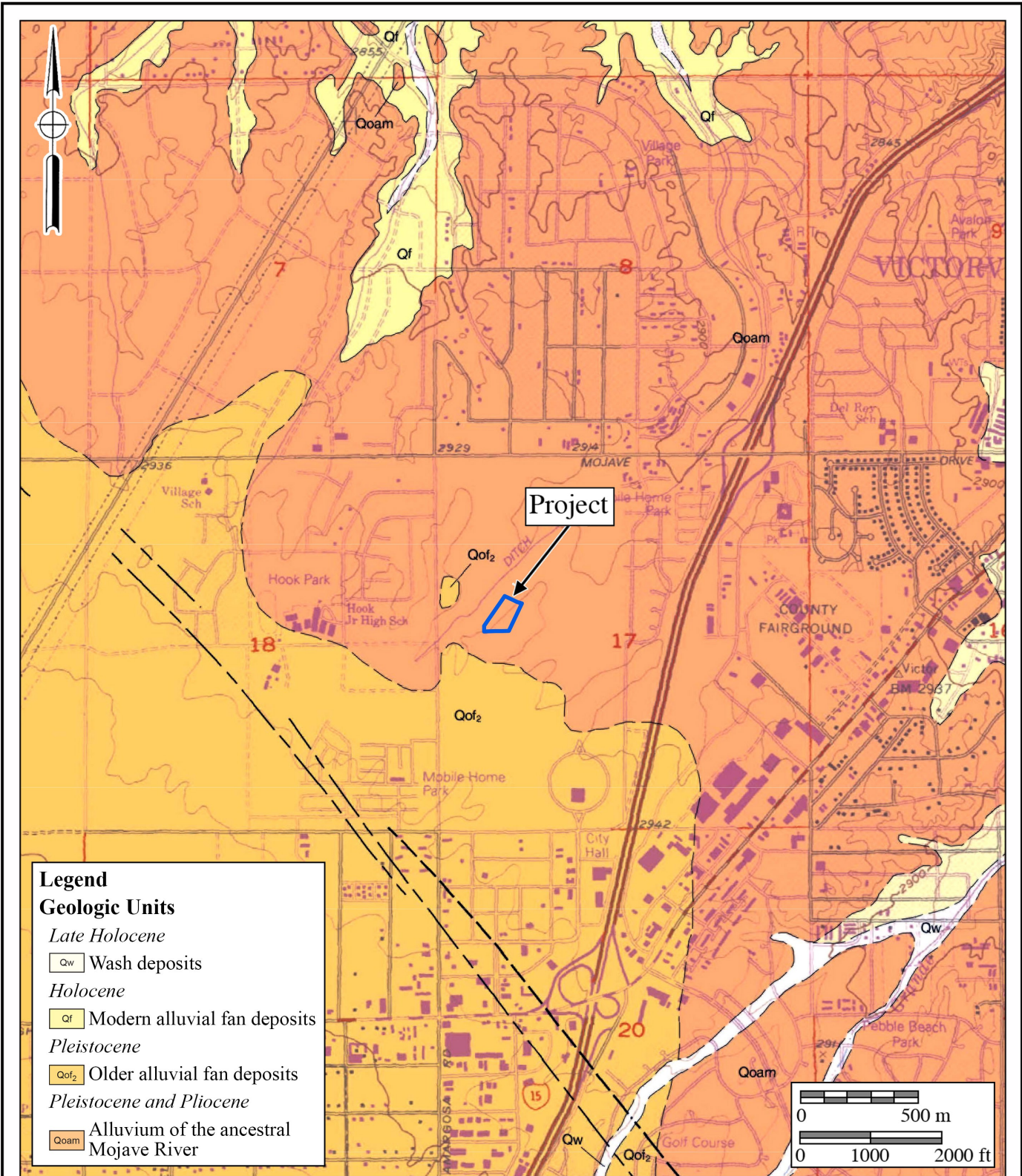


Figure 4
Geologic Map

The Roy Rogers Drive Project
Geology after Hernandez et al. (2008)

A review of published and unpublished literature was conducted for potential paleontological resources that are known in the vicinity of the project. The sources reviewed did not indicate the presence of any known fossil localities within the project. However, in the greater Victorville area, there are many recorded Pleistocene vertebrate fossil localities (Jefferson 1986, 1991, 2009; Cox et al. 2003; Romero and Hillburn 2006; City of Victorville 2008b; Reynolds and Reynolds 1994; several sources by R.E. Reynolds not available for review). Most of the specimens and records recovered from these localities are held by the SBCM. All the localities from these sources are derived from the alluvium of the ancestral Mojave River as mapped by Hernandez et al. (2008) and Cox et al. (2003) and are at least a few miles west and south of the project.

From published literature, the closest locality is about one mile northwest of the project, tusks of the mammoth species *Mammuthus* sp., cf. *M. meridionalis* were recovered during mitigation monitoring northwest of the intersection of Tawney Ridge Lane and Amargosa Road (Jefferson 2009; Reynolds and Miller 2010; Romero and Hillburn 2006) and are on display at the Mojave River Valley Museum in Barstow. Another two miles northwest of that locality, more mammoth (*M. meridionalis*) remains, consisting of the skull, mandible, pelvis, and several ribs (SBCM locs. 01.114.27, .28), were recovered near the intersection of Village Drive and Jurassic Place (Jefferson 1986, 1991, 2009) and were estimated to be approximately 375,000 years old (Cox et al. 2003).

To the southeast about two to three miles from the project, four localities were recovered from Eureka Street, Dean Place, Shrives Road, and Hesperia Road/Jasmine Street (the Southern California Edison office) (SBCM localities [locs.] 01.114.7, 01.114.31, 01.114.32, and 1.114.38, respectively; Jefferson 1986, 1991, 2009; Reynolds and Reynolds 1994). These localities include the remains of mammoths, camels, extinct horses, hare, and several species of rodents. In the neighborhood of Turner Springs, north of Air Base Road, fossils of hare (*Lepus* sp.) and freshwater invertebrates were found (SBCM locs. 01.114.24-26; Jefferson 1986, 1991, 2009). Several other Pleistocene-aged localities in the Victorville/George Air Force Base area listed by Jefferson (1986, 1991, 2009) could not be precisely located, but included mammoth, camel, llama, horse, mastodon, and rodent species.

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 is therefore typically assigned a low paleontological sensitivity. Pleistocene (greater than 11,700 years old) alluvial and alluvial fan

deposits in the Inland Empire and Mojave Desert, however, are known to yield important Ice Age terrestrial vertebrate fossils, such as extinct mammoths, mastodons, giant ground sloths, extinct species of horse, bison, and camel, saber-toothed cats, and others (Jefferson 1991). Therefore, these Pleistocene sediments are 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, as paraphrased 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 that 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.

Based upon these criteria, the geologic formation mapped at the project may be considered to have a high potential, since the geologic formation mapped at the project has yielded significant fossils nearby.

City of Victorville Assessment

Section 5.5.1.2 of the City of Victorville’s Draft EIR for the General Plan (City of Victorville 2008b) describes the paleontological resources within the city. Based upon Pleistocene vertebrate fossils recovered from sediments deposited by the ancestral Mojave River, areas mapped as such are assigned a “moderate to high sensitivity” for the potential to yield significant paleontological resources (City of Victorville 2008b [Sections 5.5-29, 5.5-30]).

In Section 5.5.4, “Project Impacts,” of the Draft EIR, mitigation of potentially significant impacts to significant nonrenewable resources is required if identified in program-level paleontological assessments. Implementation Measure 5.1.2.4 “Require[s] paleontologic monitoring of land alteration projects involving excavation into native geologic materials known to have a high sensitivity for the presence of paleontologic resources” (City of Victorville 2008b [Section 5.5-22]).

VI. CONCLUSIONS AND RECOMMENDATIONS

Research has confirmed the existence of potentially fossiliferous Pleistocene to Pliocene-aged alluvium of the ancestral Mojave River (“Qoam” on Figures 3A and 3B) that are mapped at the surface of the project; the known occurrence of significant terrestrial vertebrate fossils at shallow depths from deposits of the ancient Mojave River across Victorville; and the “moderate to high” paleontological sensitivity rating assigned to deposits of the ancient Mojave River for yielding paleontological resources all support paleontological monitoring to be implemented during mass grading and excavation activities in undisturbed Pleistocene to Pliocene-aged alluvium of the ancestral Mojave River in order to mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources. Full-time monitoring of undisturbed alluvium of the ancestral Mojave River at the project is warranted, starting at the surface.

Full-time monitoring is recommended starting at the surface during earth disturbance activities, in accordance with City of Victorville guidelines (City of Victorville 2008a, 2008b). A Paleontological Resource Impact Mitigation Program (PRIMP) should be implemented prior to the approval of the project’s grading permits by the City of Victorville, which would describe monitoring and fossil collection procedures. When implemented with the provisions of CEQA, and the guidelines of the Society of Vertebrate Paleontology (2010), an approved PRIMP would mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources (fossils), if present, to a level below significant. A PRIMP for the project is outlined below:

PRIMP Elements

1. All mitigation programs shall be performed by a qualified professional paleontologist, defined as an individual with a M.S. or Ph.D. in paleontology or geology who has proven experience in paleontology 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. Full-time monitoring for paleontological resources from the surface will be conducted in areas where grading, excavation, or drilling activities occur in alluvium of the ancestral Mojave River to mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources.
3. Paleontological monitors will be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be

- empowered to temporarily halt or divert equipment to allow for the removal of abundant or large specimens in a timely manner. The monitor shall notify the project paleontologist, who will then notify the concerned parties of the discovery. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if they are present, are determined upon exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.
4. Preparation of recovered specimens to a point of identification and permanent preservation will be conducted, including screen-washing sediments to recover small vertebrates and invertebrates if indicated by the results of test sampling. Preparation of any individual vertebrate fossils is often more time-consuming than for accumulations of invertebrate fossils.
 5. All fossils must be deposited in an accredited institution (university or museum) that maintains collections of paleontological materials. The San Bernardino County Museum in Redlands, California, is the preferred institution by the County of San Bernardino. All costs of the paleontological monitoring and mitigation program, including any one-time charges by the receiving institution, are the responsibility of the developer.
 6. Preparation of a final monitoring and mitigation report of findings and significance will be completed, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location(s). A letter documenting receipt and acceptance of all fossil collections by the receiving institution must be included in the final report. The report, when submitted to and accepted by the appropriate lead agency (e.g., the City of Victorville), will signify satisfactory completion of the project program to mitigate impacts to any nonrenewable paleontological resources.

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.



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California Professional Geologist No. 7588

June 9, 2025

Date

VIII. REFERENCES

- City of Victorville. 2008a. City of Victorville General Plan 2030, Final Program Environmental Impact Report (SCH No. 2008021086).
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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.