Appendix F

Paleontological Resources Assessment



Rocas Grandes II Project

Paleontological Resources Assessment

prepared for

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RINCON CONSULTANTS, INC. SINCE 1994

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Executive Summary

Purpose and Scope

Rincon Consultants, Inc. (Rincon) was retained by the Emri Group to conduct a Paleontological Resources Assessment (PRA) for the Rocas Grandes II (project) in Moreno Valley, Riverside County, California. This PRA includes a literature review, paleontological sensitivity assessment, and reporting consistent with the professional standards of the Society of Vertebrate Paleontology (SVP; 2010) to determine whether the proposed action would result in significant impacts to paleontological resources under the California Environmental Quality Act (CEQA).

Results of Investigation

The project site is underlain by Quaternary very old alluvial fan deposits (Morton and Miller 2006). Sediments similar to Quaternary very old alluvial fan deposits have produced scientifically significant paleontological resources in Riverside County (Jefferson 2010; Paleobiology Database 2024; Stoneburg 2024); therefore, this geologic unit has high paleontological sensitivity. However, the project's geotechnical investigation determined that these sediments were disturbed (and thus not paleontologically sensitive) down to a depth of 1 foot (Geocon West, Inc. 2024). Therefore, sediments within the project site have no paleontological sensitivity from 0 to 1 foot below the surface and high paleontological sensitivity greater than 1 foot below the surface. A records search of the Western Science Center determined there are no known fossil localities within the project site (Stoneburg 2024).

Impacts and Recommendations

The project site is underlain by Quaternary very old alluvial fan deposits, which have been disturbed to a depth of 1 foot, meaning that sediments within the project site have no paleontological sensitivity from 0 to 1 foot below the surface and high paleontological sensitivity greater than 1 foot below the surface. Ground-disturbing construction activities that affect previously undisturbed portions of these geologic units could result in significant impacts to paleontological resources under CEQA.

Ground-disturbing construction activities at the project site are anticipated to consist of site grading and excavations. Plans for the new utility and drainage infrastructure are not yet finalized. However, it is highly likely that undisturbed portions of high-sensitivity Quaternary very old alluvial fan deposits will be impacted. Therefore, project construction has the potential to significantly impact paleontological resources under CEQA.

Mitigation Measure PAL-1 is recommended to reduce potential impacts to paleontological resources to a level of less-than-significant under CEQA. This mitigation measure would require paleontological monitoring of all project excavations exceeding 1 foot in depth under the direction of a Qualified Professional Paleontologist according to SVP (2010) standards.

1 Introduction

Rincon Consultants, Inc. (Rincon) conducted a desktop Paleontological Resources Assessment (PRA) on behalf of the Emri Group for the Rocas Grandes II (project) in Riverside County, California. This assessment includes a literature review, paleontological records search, paleontological sensitivity assessment, and reporting consistent with the professional standards of the Society of Vertebrate Paleontology (SVP; 2010). The project is subject to the California Environmental Quality Act (CEQA), and the City of Moreno Valley (City) is the lead agency for CEQA.

Paleontological resources (i.e., fossils) are the remains or traces of prehistoric life. Fossils are typically preserved in layered sedimentary rocks, and the distribution of fossils across the landscape is controlled by the distribution and exposure of the fossiliferous sedimentary rock units at and near the surface. Construction-related impacts that typically affect or have the potential to affect paleontological resources include mass excavation operations, drilling/borehole excavations, trenching/tunneling, and grading. Ground-disturbing construction activities associated with the proposed project would mainly consist of grading, trenching, and excavation. This PRA provides a list of the formations mapped at the surface within the project site and formations that underlie those mapped at the surface that may be impacted by project construction activities.

1.1 Project Location

The project site is located south of Alessandro Boulevard, immediately east of the future extension of Darwin Drive, north of the future extension of Brodiaea Avenue, and west of vacant land and the future Morrison Street in the City of Moreno Valley, Riverside County, California. The project site is approximately 20.01 gross acres (18.5 net acres) and includes Assessor Parcel Numbers (APNs) 486-280-002 and 486-280-004. See Figure 1 for a map of the regional project location and Figure 2 for maps of the project sites in a local context.

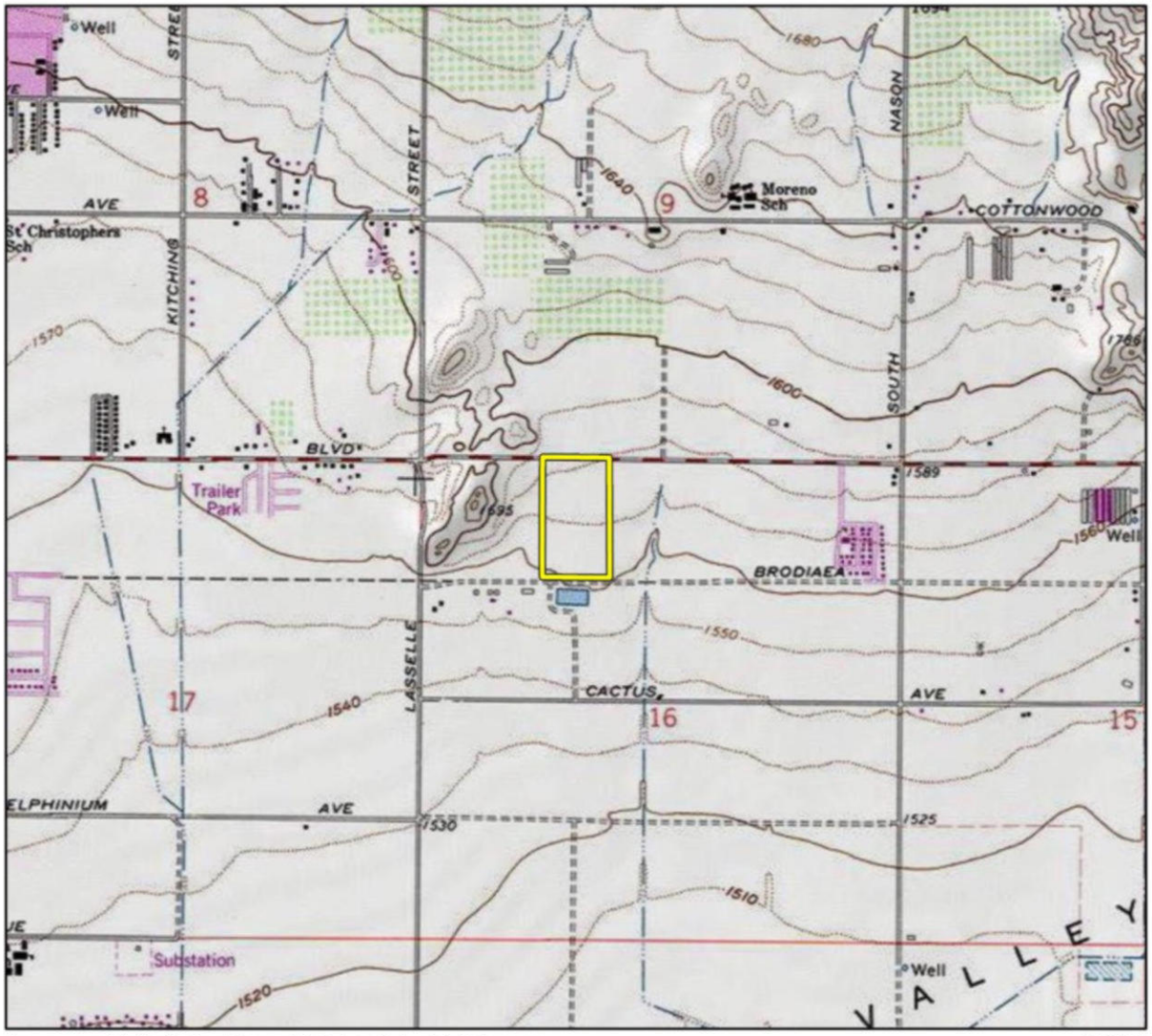
1.2 Project Description

The project would allow for the development of a 460-unit multi-family residential community with 80 residential townhome units and 380 residential stacked flats. Project amenities would include a recreational area with a clubhouse and co-work area, swimming pool and spa, fitness center and family room, a dog park, as well as additional common open spaces. The project includes 860 parking spaces, which would be provided in garages, as well as covered carports and open surface parking.

Project implementation would require construction of new on-site utility (e.g., water, sewer, electrical, natural gas) and drainage infrastructure to serve the residences and associated project amenities. The project would connect these proposed utilities to existing utility infrastructure in adjacent roadways, with the final sizing and design of on-site facilities occurring during final building design and plan check.

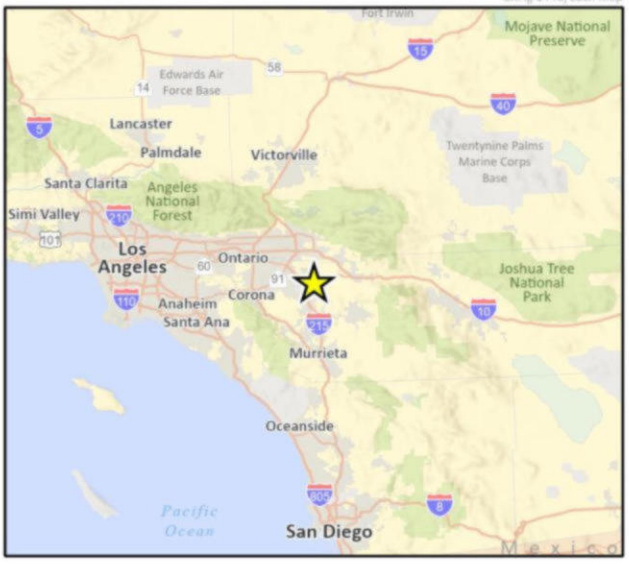
The estimated grading quantities are 10,000 cubic yards (cy) of cut and 90,000 cy of fill inclusive of off-site disturbance for roadway and infrastructure improvements. Approximately 80,000 cy of import would be required.

Figure 1 Regional Location



Basemap provided by National Geographic Society, Esri and their licensors © 2024. Sunnymead Quadrangle. T03S R03W S09, 16. The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.

24-15609 CR
CRFig 1 Proj Locn Map

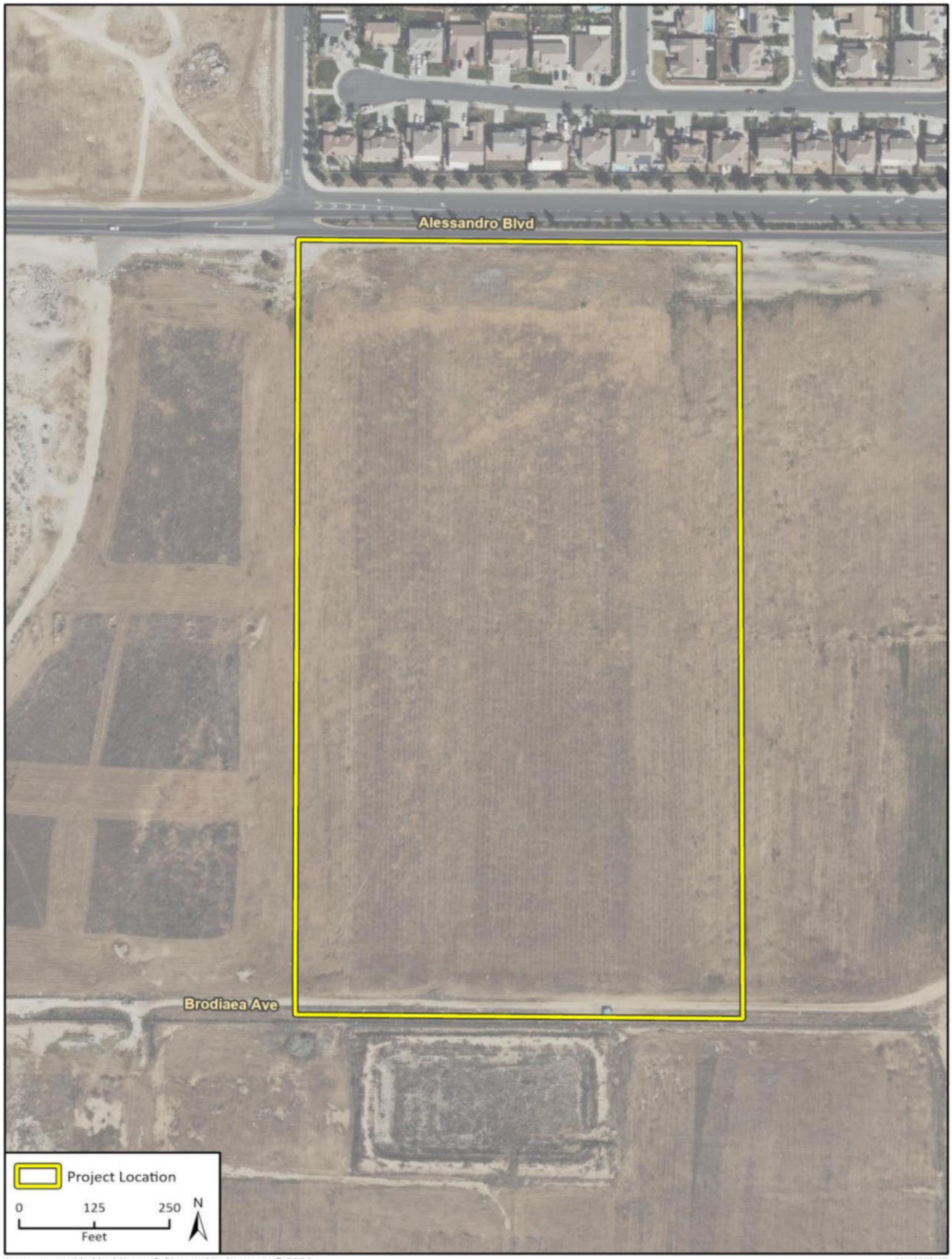


Project Location

0 1,000 2,000 Feet

N

Figure 2 Project Location



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24-15609 CR
CRFig 2 Project Site

2 Regulations

2.1 State Regulations

California Environmental Quality Act

Paleontological resources are protected under CEQA, which states a project would "normally" have a significant effect on the environment if project effects exceed an identified threshold of significance (CEQA Guidelines Section 15064.7[a]). Appendix G of the CEQA Guidelines (the Environmental Checklist Form) provides suggested thresholds of significance for evaluating a project's environmental impacts, including impacts to paleontological resources. In Section VII(f), the question is posed thus: "Will the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?" To determine the uniqueness of a given paleontological resource, it must first be identified or recovered (i.e., salvaged). Therefore, CEQA mandates mitigation of adverse impacts, to the extent practicable, to paleontological resources.

CEQA does not define "a unique paleontological resource or site." However, the SVP (2010) has defined a "significant paleontological resource" in the context of environmental review as follows:

> Fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information.

Paleontological resources are typically older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years) (SVP 2010).

The loss of paleontological resources meeting the criteria outlined above (i.e., a significant paleontological resource) would be a significant impact under CEQA, and the CEQA lead agency is responsible for mitigating impacts to paleontological resources, where practicable, in compliance with CEQA and other applicable statutes.

California Public Resources Code

California Public Resources Code Section 5097.5 states:

> No person shall 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, 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. Violation of this section is a misdemeanor.

Here "public lands" means those owned by, or under the jurisdiction of, the State or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, public agencies are required to comply with Public Resources Code Section 5097.5 for their own activities, including construction and maintenance, and for permit actions (e.g., encroachment permits) undertaken by others.

2.2 Regional and Local Regulations

City of Moreno Valley Municipal Code

Chapter 7.05 of the City of Moreno Valley municipal code states that objects of paleontological value may be designated as a 'landmark' through an official review process. Owners of landmarks have a duty to "maintain and keep in good repair the exterior of such landmark and premises."

3 Paleontological Resources Assessment Guidelines

Paleontological resources are limited, nonrenewable resources of scientific, cultural, and educational value and are afforded protection under state and local laws and regulations. This PRA satisfies Public Resources Code Section 5097.5 requirements and follows guidelines and significance criteria specified by the SVP (2010).

3.1 Paleontological Sensitivity

Paleontological sensitivity refers to the potential for a geologic unit to produce scientifically significant fossils. Direct impacts to paleontological resources occur when earthwork activities, such as grading or trenching, cut into the geologic deposits within which fossils are buried and physically destroy the fossils. Because fossils are the remains of prehistoric animal and plant life, they are considered to be nonrenewable. These activities may constitute significant impacts under CEQA or adverse effects under federal environmental protection laws and may require mitigation. Sensitivity is determined by rock type, history of the geologic unit in producing significant fossils, and fossil localities recorded from that unit. Paleontological sensitivity is derived from the known fossil data collected from the entire geologic unit, not just from a specific survey.

The discovery of a vertebrate fossil locality is of greater significance than that of an invertebrate fossil locality, especially if it contains a microvertebrate assemblage. The recognition of new vertebrate fossil locations could provide important information on the geographical range of the taxa, their radiometric age, evolutionary characteristics, depositional environment, and other important scientific research questions. Vertebrate fossils are almost always significant because they occur more rarely than invertebrates or plants. Thus, geologic units having the potential to contain vertebrate fossils are considered the most sensitive.

3.2 Resource Assessment Criteria

In its *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*, the SVP outlines guidelines for categorizing paleontological sensitivity of geologic units within a project site (SVP 2010). The SVP describes sedimentary rock units as having a high, low, undetermined, or no potential for containing significant nonrenewable paleontological resources. This criterion is based on rock units within which vertebrates or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. Significant paleontological resources are fossils or assemblages of fossils that are unique, unusual, rare, or uncommon diagnostically, stratigraphically, taxonomically, or regionally (SVP 2010). The paleontological sensitivity of the project site has been evaluated according to the following categories:

- **High Potential (Sensitivity).** Rock units from which significant vertebrate or significant invertebrate fossils or significant suites of plant fossils have been recovered are considered to have a high potential for containing significant non-renewable fossiliferous resources. These units include, but are not limited to, sedimentary formations and some volcanic formations that contain significant nonrenewable paleontological resources anywhere within their geographical

extent and sedimentary rock units temporally or lithologically suitable for the preservation of fossils. Sensitivity comprises both (a) the potential for yielding abundant or significant vertebrate fossils or for yielding a few significant fossils, large or small, vertebrate, invertebrate, or botanical and (b) the importance of recovered evidence for new and significant taxonomic, phylogenetic, ecologic, or stratigraphic data. Areas that contain potentially datable organic remains older than recent, including deposits associated with nests or middens, and areas that may contain new vertebrate deposits, traces, or trackways are also classified as significant. Full-time monitoring is typically recommended during any project-related ground disturbance in geologic units with high sensitivity.

- **Low Potential (Sensitivity).** Sedimentary rock units that are potentially fossiliferous but have not yielded fossils in the past or contain common and/or widespread invertebrate fossils of well-documented and understood taphonomic processes (those affecting an organism following death, burial, and removal from the ground), phylogenetic species (evolutionary relationships among organisms), and habitat ecology. Reports in the paleontological literature or field surveys by a qualified vertebrate paleontologist may allow determination that some areas or units have low potential for yielding significant fossils prior to the start of construction. Generally, these units will be poorly represented by specimens in institutional collections and will not require protection or salvage operations.
- **Undetermined Potential (Sensitivity).** Specific areas underlain by sedimentary rock units for which little information is available are considered to have undetermined fossiliferous potentials. Field surveys by a qualified vertebrate paleontologist to specifically determine the potential of the rock units are required before programs of impact mitigation for such areas may be developed.
- **No Potential.** Rock units of metamorphic or igneous origin are commonly classified as having no potential for containing significant paleontological resources.

4 Methods

Rincon reviewed published geologic maps to identify the geologic units present at and below the surface within the project site (Morton and Miller 2006). Rincon reviewed the online paleontological collections database of the University of California Museum of Paleontology (UCMP; 2024) and Paleobiology Database (2024) and consulted primary literature to identify known fossil localities in Riverside County and surrounding regions from similar geologic units to those identified within the project site. Rincon requested a records search of the Western Science Center on May 3, 2024, to identify any fossil localities known from within the project site or nearby fossil localities known from the same geologic units as those underlying the project site. The project site contains no bedrock exposures; therefore, a field survey was not warranted.

Paleontological sensitivity ratings of the geological formations were assigned based on the findings of the records search and literature review and based on the potential effects to nonrenewable paleontological resources from project construction following SVP (2010) guidelines.

5 Description of Resources

5.1 Geologic Setting

The project site is situated in the Peninsular Ranges, one of the eleven major geomorphic provinces in California (California Geological Survey 2002). In general, the Peninsular Ranges consist of northwest-southeast trending mountain ranges and faults (Norris and Webb 1976). These mountains are generally comprised of Mesozoic to Cenozoic plutonic and extrusive igneous and Cretaceous marine sedimentary rocks. The Peninsular Ranges province also contains sedimentary basins such as the Los Angeles Basin which have accumulated thick sequences of Cenozoic marine and terrestrial sedimentary rocks. Specifically, the project site is located in the Moreno Valley, which is part of the Perris Block, a geophysical block with low topographic relief which is bounded to the west by the Elsinore Fault Zone and to the east by the San Jacinto Fault Zone (Morton and Miller 2006).

Locally, the project site is within the *Sunnymead, California* United States Geological Survey 7.5-minute quadrangle.

5.2 Geology of the Project Site

The geology of the region around the project site was mapped by Morton and Miller (2006), who identified one geologic unit, Quaternary very old alluvial fan deposits, underlying the site (Figure 3).

Quaternary Very Old Alluvial Fan Deposits

Quaternary very old alluvial fan deposits underlie the entire project site (Figure 3) and consist of moderately to well-consolidated silt, sand, and gravel that is middle to early Pleistocene in age (Morton and Miller 2006). Pleistocene-aged alluvial deposits are known to produce scientifically significant paleontological resources in western Riverside County and adjacent portions of San Bernardino County, including taxa such as mammoth (*Mammuthus*), mastodon (*Mammut*), saber-toothed cat (*Smilodon*), ground sloth (*Paramylodon*), other mammals, reptiles, birds, fish, and invertebrates (Jefferson 2010; Paleobiology Database 2024; UCMP 2024). Therefore, Quaternary very old alluvial fan deposits have high paleontological sensitivity.

Subsurface Geology

Geotechnical borings conducted for the project reported that sediments within the project site consisted of brown, red-brown, or gray-brown silt to sand with occasional gravelly and clayey layers (Geocon West, Inc. 2023), which agrees with the description of Quaternary very old alluvial fan deposits from Morton and Miller (2006). The geotechnical report also stated that sediments within the project site were disturbed, and thus not paleontologically sensitive, down to a depth of 1 foot. Test borings for the geotechnical report reached a maximum depth of 51.5 feet, beyond the maximum anticipated depth of excavation for this project, and never encountered tonalite bedrock, which is an intrusive igneous rock and thus not paleontologically sensitive (SVP 2010). Therefore, sediments within the project site have no paleontological sensitivity from the surface to 1 foot below the surface and high paleontological sensitivity greater than 1 foot below the surface.

Figure 3 Geologic Map and Paleontological Sensitivity of Project Site



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Geologic data provided by Morton and Miller, 2006.

5.3 Paleontology of the Project Site

A formal fossil locality search of the Western Science Center identified no fossil localities within the project site or within one mile of the project site (Stoneburg 2024). However, Stoneburg (2024) noted that the sediments underlying the project site (i.e., Quaternary very old alluvial fan deposits) are known to be paleontologically sensitive.

6 Evaluation, Impacts, and Recommendations

6.1 Paleontological Sensitivity Evaluation

The project site is underlain by one geologic unit, Quaternary very old alluvial fan deposits, which has high paleontological sensitivity. However, the project's geotechnical investigation determined that the sediments within the project site were disturbed down to a depth of 1 foot. Therefore, sediments within the project site have no paleontological sensitivity from the surface to 1 foot below the surface and high paleontological sensitivity greater than 1 foot below the surface (Figure 3).

6.2 Impacts

Significant impacts to paleontological resources include the destruction, damage, or loss of scientifically important paleontological resources or associated stratigraphic data. Ground-disturbing activities (i.e., grading, excavating, trenching, boring/drilling of 2-foot-diameter or greater) in undisturbed sediments or geologic units with high paleontological sensitivity have the potential to significantly impact paleontological resources under CEQA. Activities that impact exclusively disturbed and/or fill sediments do not pose a risk to impact paleontological resources. Boring/drilling with less than a 2-foot-diameter and pile-driving do not produce spoils capable of preserving scientifically significant paleontological resources; therefore, these activities do not pose a risk to impact paleontological resources.

Ground-disturbing construction activities at the project site are anticipated to consist of overall site grading, grading for building pads, and excavations for utilities (e.g., water, sewer, electrical) and drainage systems. If these activities reach deeper than 1 foot below the current (i.e., pre-construction) ground surface, then undisturbed portions of high-sensitivity Quaternary very old alluvial fan deposits will be impacted, and paleontological resources may be significantly impacted under CEQA.

6.3 Recommendations

The following mitigation measure would address potentially significant impacts to paleontological resources that could result from project construction. This measure would only apply to ground-disturbing activities in previously undisturbed sediments associated with the construction occurring at the project site. Implementation of Mitigation Measure PAL-1 would effectively mitigate the project's potentially significant impacts to these resources under CEQA, through the recovery, identification, and curation of previously unrecovered fossils.

PAL-1 Paleontological Resources Monitoring and Mitigation

Qualified Professional Paleontologist

Prior to excavation, the contractor shall retain a Qualified Professional Paleontologist as defined by the Society of Vertebrate Paleontology (SVP 2010), meaning an individual with:

- A graduate degree in paleontology or geology, and/or a publication record in peer reviewed journals; and demonstrated competence in field techniques, preparation, identification, curation, and reporting in the state or geologic province in which the project occurs. An advanced degree is less important than demonstrated competence and regional experience.
- At least two full years professional experience as assistant to a Project Paleontologist with administration and project management experience; supported by a list of projects and referral contacts.
- Proficiency in recognizing fossils in the field and determining their significance.
- Expertise in local geology, stratigraphy, and biostratigraphy.
- Experience collecting vertebrate fossils in the field.

The Qualified Professional Paleontologist shall direct all mitigation measures related to paleontological resources.

Paleontological Worker Environmental Awareness Program

Prior to the start of construction, the Qualified Professional Paleontologist or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction personnel.

Paleontological Monitoring and Salvage

Full-time paleontological monitoring shall be conducted during ground-disturbing construction activities (i.e., grading, excavating, trenching, boring/drilling of 2-foot-diameter or greater) within previously undisturbed sediments greater than 1 foot below the original (i.e., pre-construction) ground surface. Paleontological monitoring shall be conducted by a paleontological monitor with experience with collection and salvage of paleontological resources and who meets the minimum standards of the SVP (2010) for a Paleontological Resources Monitor, meaning an individual with:

- BS or BA degree in geology or paleontology and one year experience monitoring in the state or geologic province of the specific project. An associate degree and/or demonstrated experience showing ability to recognize fossils in a biostratigraphic context and recover vertebrate fossils in the field may be substituted for a degree. An undergraduate degree in geology or paleontology is preferable, but is less important than documented experience performing paleontological monitoring, or
- AS or AA in geology, paleontology, or biology and demonstrated two years of experience collecting and salvaging fossil materials in the state or geologic province of the specific project, or
- Enrollment in upper division classes pursuing a degree in the fields of geology or paleontology and two years of monitoring experience in the state or geologic province of the specific project.
- Monitors must demonstrate proficiency in recognizing various types of fossils, in collection methods, and in other paleontological field techniques.

The Qualified Professional Paleontologist may recommend that monitoring be reduced in frequency or ceased entirely based on geologic observations, such as the presence of disturbed and/or fill sediments or other non-sensitive geologic units beyond what is anticipated. Such decisions shall be subject to review and approval by the City.

In the event of a fossil discovery by the paleontological monitor or construction personnel, all construction activity within 50 feet of the find shall cease, and the Qualified Professional

Paleontologist shall evaluate the find. If the fossil(s) is (are) not scientifically significant, then construction activity may resume. If it is determined that the fossil(s) is (are) scientifically significant, the following shall be completed:

- **Fossil Salvage.** The paleontological monitor shall salvage (excavate and recover) the fossil to protect it from damage/destruction. Typically, fossils can be safely salvaged quickly by a single paleontological monitor with minimal disruption to construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. Bulk matrix sampling may be necessary to recover small invertebrates or microvertebrates from within paleontologically sensitive deposits. After the fossil(s) is (are) salvaged, construction activity may resume.
- **Fossil Preparation and Curation**. Fossils shall be identified to the lowest (most-specific) possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the Qualified Professional Paleontologist.

Final Paleontological Mitigation Report

Upon completion of ground-disturbing activities (or laboratory preparation and curation of fossils, if necessary), the Qualified Professional Paleontologist shall prepare a final report describing the results of the paleontological monitoring efforts. The report shall include a summary of the field and laboratory methods employed; an overview of project geology; and, if fossils were discovered, an analysis of the fossils, including physical description, taxonomic identification, and scientific significance. The report shall be submitted to the City and, if fossil curation occurred, the designated scientific institution.

7 References

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8 Preparers

This report was prepared by Dr. Andrew McGrath and reviewed for quality assurance and control by Cultural Resources Principal, Margo Nayyar.