

August 1, 2025

City of Colton
650 North La Cadena Drive
Colton, CA 92324

RE: *Paleontological Assessment Letter Report for Colton Medical/Hotel Development Project, San Bernardino County, California*

To whom it may concern:

ECORP Consulting, Inc. (ECORP) completed a thorough investigation into the potential to directly affect paleontological resources during the construction of the Colton Medical/Hotel Development Project (Project). This investigation included an attempt to obtain a paleontological record search through the Western Science Center in Hemet, California and a desktop study of the geology and paleontology of the Project Area.

The Project Area consists of 8.95 acres of land located in the northwestern quarter of the northeastern quarter of Section 24 of Township 1 South, Range 5 West, San Bernardino Base and Meridian, as depicted on the 1967 (photorevised 1980) U.S. Geological Survey San Bernardino South, California 7.5-minute topographic quadrangle (Figure 1). The Project Area includes one parcel, which is identified by Assessor Parcel Number 0254-071-10-0000, and is located to the west of North Pepper Avenue, south of West San Bernardino Avenue, and north of Valley Boulevard. The Proposed Project would result in the construction of a three-story, 60,000-square-foot medical office clinic, a five-story 71,000-square-foot commercial hotel, a three-story parking structure, and surface parking areas within 3.83 acres of the Project Area. Associated site improvements include curbs and gutters, utilities, and landscaping. The remaining 5.12 acres in the western portion of the Project Area will be a dedicated conservation area for the Delhi Sands flower-loving fly (*Rhaphiomidas terminatus abdominalis*).

GEOLOGIC UNITS

The Project is located in the Peninsular Ranges Geomorphic Province of California. The Peninsular Ranges are characterized by northwest-trending steep mountains separated by sediment-filled elongated valleys (Poole and Wood 2020). Nearby, the San Andreas Fault is the dominant structural geologic feature and associated with and subparallel to the San Andreas Fault are the San Jacinto Fault, Newport-Inglewood, and the Whittier-Elsinore Fault while the Perris Block forms the other side of the fault zone to the east.

A paleontological resource assessment conducted less than 1 mile east of the Project Area indicated that the Project Area is directly underlain by Quaternary alluvium and eolian drift sand deposits of Holocene age (Applied Earthworks 2015) (Figure 2). Bortugno and Spittler (1986) have also described the soils as being Holocene in age. The eolian sediment are described as yellowish-brown sand dune deposits composed of poorly to moderately consolidated, well- to poorly sorted, fine- to medium- grained sand, silty sand, and fine gravelly sand. The alluvial deposits contain coarse material and are poorly to moderately sorted (Applied Earthworks 2015). Holocene-age eolian and alluvial deposits are typically too

young to contain fossils; however, they may be underlain by older, sensitive Pleistocene deposits, which have proven to contain significant fossils throughout Southern California.

RECORDS SEARCH RESULTS

ECORP attempted to conduct a paleontological record search through the Western Science Center in Hemet, California but did not receive any response; therefore, the results discussed herein are based on findings conducted through literature searches for other projects within the City of Colton. Most professional paleontologists in California adhere to the Society of Vertebrate Paleontology (SVP; 2010) guidelines to determine the mitigation protocols. These guidelines are used to assess the paleontological resource potential of the underlying geologic units. The potential of the geologic unit(s) can be assigned to one of four categories defined by the SVP (2010): high, undetermined, low, and no potential.

Applied Earthworks (2015) conducted a record search through the Los Angeles County Museum (LACM). Although no previously recorded vertebrate fossil localities were found in the Project Area from within Quaternary alluvial and eolian deposits, the LACM did identify two vertebrate localities of deer and whipsnake (LACM 1207 and LACM 7811, respectively) nearby from within older Pleistocene-age sedimentary deposits (Applied Earthworks 2015).

First Carbon Solutions (2019) conducted a cultural resources assessment on the Ashley Way Logistics Center Project in the City of Colton south of Interstate 10. A record search through LACM also produced the whipsnake (LACM 7811) as well as a specimen of fossil horse (LACM 4540).

RECOMMENDATIONS

Based on the literature reviews, the paleontological sensitivity of the Project Area and vicinity was determined in accordance with the SVP's (2010) sensitivity scale. The younger Quaternary alluvial and eolian deposits are determined to have a low paleontological resource potential, whereas older Quaternary deposits, if encountered with depth, are designated a high paleontological resource potential. Because depths are assumed to not exceed 5.7 feet, it is unlikely that older Quaternary deposits will be encountered. As such, no full-time monitoring will be required. Nonetheless, all construction workers and onsite personnel should receive environmental awareness training on paleontological resources in case an inadvertent discovery is made. If an inadvertent discovery is made, the following mitigation measure will apply:

GEO-1 Unanticipated Discovery – Paleontological Resource. Although full-time monitoring is not warranted based on the low sensitivity to produce paleontological resources (i.e., fossil remains), a Worker's Environmental Awareness Program should be given to all personnel associated with the Project prior to ground disturbance in case any unanticipated paleontological resources are discovered during excavation activities. If an unanticipated discovery is made, the contractor will notify the City of Colton and cease excavation within 50 feet of the find until a qualified paleontological professional can provide an evaluation of the site. The qualified paleontological professional will evaluate the significance of the find and recommend appropriate measures for the disposition of the site (e.g., fossil recovery,

curation, data recovery, and/or monitoring). Construction activities may continue on other parts of the construction site while evaluation and treatment of the paleontological resource takes place.

Sincerely,



Niranjala Kottachchi
Paleontological Resources Manager

REFERENCES

- Applied Earthworks 2015. *Paleontological Resource Assessment for the Medical School Parcels Project in the City of Colton, San Bernardino County, California*, 8pp.
- Bortugno, E. J. and T. E. Spittler. 1986. *The San Bernardino Quadrangle, California*, 1:250,000.
- First Carbon Solution 2019. *Phase I Cultural Resources Assessment, Ashley Way Logistics Center Project, Colton, San Bernardino, California*, 60p.
- Poole, S. M. and Wood, A. G. 2020. *Preliminary Geotechnical Interpretive Report, Proposed Commercial Development, Assessor's Parcel Number 0276-361-21, Located at 1395 East Washington Street, City of Colton, San Bernardino County, California*, 70p.
- Society of Vertebrate Paleontologists (SVP). 2010. *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*. 11 pp. https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines-1.pdf.



Location: N:\2024\2024-179.01 Colton Medical_Hotel Development\MAPS\Location_Vicinity\CWHD_LnV.aprx - Colton Medical/Hotel Development Location/Vicinity (lgalvez - 5/13/2025)

Map Date: 5/13/2025
Sources: Esri, County of San Bernardino 2024

Figure 1. Location/ Vicinity



Figure 2. Geologic Units