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April 15, 2021

Ms. Eliza Laws
Senior Environmental Analyst
Albert A. Webb Associates
3788 McCray Street
Riverside, CA 92506
Transmitted via email to eliza.laws@webbassociates.com

RE: Paleontological Technical Memorandum for the IDI South Perris 215 Improvement Project, City of Perris, Riverside County, California

Dear Ms. Laws,

At the request of Webb Associates, Applied EarthWorks, Inc. (Æ) completed a paleontological resource assessment for the IDI South Perris 215 Improvement Project near the City of Perris, Riverside County, California (Project). Æ's scope of work included desktop review of geologic maps, paleontological literature, museum records searches, and preparation of this technical memorandum (memo).

Written in partial satisfaction of the requirements of the California Environmental Quality Act (CEQA), this memorandum was written by staff who meet the mitigation paleontology industry standards (Murphey et al., 2019), as well as qualifications standards of the Society of Vertebrate Paleontology (SVP, 2010). The City of Perris (City) is the lead agency for CEQA compliance.

PROJECT DESCRIPTION AND BACKGROUND

The Project area is in the southeast portion of the City of Perris in western Riverside County (County). Specifically, the Project area is located within the southeast quarter of Section 4, northeast quarter of Section 9, and the northwest quarter of section 10 in Township 5 South, Range 3 West. The Perris, California 7.5-minute U.S. Geological Survey (USGS) topographic quadrangle map includes the Project area and environs. Elevation is approximately 1,420 feet above mean sea level (amsl).

The Project involves the improvement of Interstate 215 (I-215)/State Route 74 (SR 74) interchange southbound ramps near Case Road to accommodate the increased traffic flow generated by development of the nearby South Perris Industrial Project Site 3, which was already developed under a previous CEQA process. The proposed improvements will ensure safer traffic operations for vehicle operators, bicyclists, and pedestrians. Additional improvements include regrading of existing slopes, removal of existing pavement sections, grind and overlay pavement rehabilitation, and relocation of existing signs.

The maximum depths of ground disturbance are 15 feet below ground surface (bgs) for the traffic signal poles and 2 to 3 feet bgs for the road improvements. The proposed improvements will occur within existing right-of-way.



REGULATORY CONTEXT

This Project is subject to both state laws and local goals and policies. The following sections provide an overview of the regulatory context for the Project.

State

At the state level, paleontological resources are protected under CEQA, which requires detailed studies that analyze the environmental effects of a proposed project. If a project is determined to have a potential significant environmental effect, the act requires that alternative plans and mitigation measures be considered. Specifically, Section VII(f) of Appendix G of the CEQA Guidelines, the Environmental Checklist Form, poses the question, "Will the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?" If paleontological resources are identified as being within the proposed project area, the sponsoring agency must take those resources into consideration when evaluating project effects. The level of consideration may vary with the importance of the resource.

Local

There are four policies covering paleontological resources within the County's *General Plan*, *Multipurpose Open Space (OS) Element* (County of Riverside, 2015b:OS-51):

- OS 19.6: Whenever existing information indicates that a site proposed for development has high paleontological sensitivity as shown on Figure OS-8, paleontological resource impact mitigation program (PRIMP) shall be filed with the Riverside County Geologist prior to site grading. The PRIMP shall specify the steps to be taken to mitigate impacts to paleontological resources.
- OS 19.7: Whenever existing information indicates that a site proposed for development has low paleontological sensitivity as shown on Figure OS-8, no direct mitigation is required unless a fossil is encountered during site development. Should a fossil be encountered, the Riverside County Geologist shall be notified and a paleontologist shall be retained by the project proponent. The paleontologist shall document the extent and potential significance of the paleontological resources on the site and establish appropriate mitigation measures for further site development.
- OS 19.8: Whenever existing information indicates that a site proposed for development has undetermined paleontological sensitivity as shown on Figure OS-8, a report shall be filed with the Riverside County Geologist documenting the extent and potential significance of the paleontological resources on site and identifying mitigation measures for the fossil and for impacts to significant paleontological resources prior to approval of that department.
- **OS 19.9:** Whenever paleontological resources are found, the County Geologist shall direct them to a facility within Riverside County for their curation, including the Western Science Center in the City of Hemet.



The City of Perris General Plan, *Conservation Element* includes Policy IV.A and associated Implementation Measure IV.A.4, which address the protection of paleontological resources (City of Perris, 2008:47). Following the General Plan, the City's *Perris Valley Commerce Center Specific Plan Final Environmental Impact Report* (PVCCSP FEIR) set forth Mitigation Measure (MM) Cultural 5, which details procedures for mitigation of paleontological resources (City of Perris, 2011:11.0-26,27).

PALEONTOLOGICAL RESOURCE POTENTIAL

Most professional paleontologists in California adhere to the guidelines set forth by the SVP (2010) to determine the course of paleontological mitigation for a given project unless specific city, county, state, or federal guidelines are available. The County has developed its own guidelines that establish detailed protocols for the assessment of the paleontological sensitivity of a project area and outline measures to follow in order to mitigate adverse impacts to known or unknown fossil resources during project development (County of Riverside, 2015a). Furthermore, the City created a paleontological sensitivity map with associated implementation measures.

Following the County's established process, baseline information is used to assign the paleontological sensitivity of a geologic unit(s) (or members thereof) to one of four categories—Low, Undetermined, High A (Ha), and High B (Hb) potential (County of Riverside, 2015a). Geologic units are considered to be "sensitive" for paleontological resources and have a High paleontological resource potential if they are known to contain significant fossils anywhere in their extent, even if outside the Project area. High A (Ha) sensitivity is based on the occurrence of fossils that may be present at the ground surface of the Project area, while High B (Hb) sensitivity is based on the occurrence of fossils at or below 4 feet of depth, which may be impacted during construction activities (County of Riverside, 2015a). A coarse-grained paleontological sensitivity map of Riverside County indicates the sensitivity rankings across the ground surface based on the County's established process (County of Riverside, 2015b:Figure OS-8, OS-55).

The City has developed its own paleontological sensitivity map, which divides the City of Perris and its immediate vicinity into five areas based on the geologic units exposed at or near the surface. Each area (geologic unit) is assigned to one of three categories—Low, High, and Low to High Sensitivity (City of Perris, 2008). Low or High Sensitivity indicate the geologic unit has low or high potential, respectively, to yield significant fossil resources. Low to High Sensitivity indicates the potential for impacts to fossil resources changes from low to high potential once excavation reaches five feet below ground surface (City of Perris, 2008).

METHODOLOGY

To assess the paleontological sensitivity of geologic units exposed at the ground surface and those likely to occur in the subsurface of the Project area, Æ reviewed published geologic maps and paleontological literature, and conducted museum records searches. For the records searches, Æ retained the Natural History Museum of Los Angeles County (NHMLAC) and the Western Science Center (WSC) in Hemet, California, to conduct a search of fossil localities recorded in their collections (Bell, 2021; Radford, 2021).



To augment these results, Æ also conducted searches of the online Paleobiology Database (PBDB) and the University of California Museum of Paleontology (UCMP). The PBDB lists a large collection of museum records and publications of fossil material, while the UCMP is the largest repository of fossils on the West Coast of the United States with an older history of collection than several other regional natural history museums.

RESOURCE CONTEXT

The Project area is within the northern portion of the Peninsular Ranges Geomorphic Province, which extends 125 miles south from the Transverse Ranges through the Los Angeles Basin to Baja California. A geomorphic province is a region of unique topography and geology that is distinguished from other regions based on its landforms and tectonic history (American Geological Institute, 1976). The Peninsular Ranges comprise a series of mountain ranges separated by northwest-trending valleys formed from faults branching from the San Andreas Fault (Norris and Webb, 1976; California Geological Survey, 2002). The mountain ranges are bounded to the east by the Colorado Desert and range in width from 30 to 100 miles (Norris and Webb, 1976). The Project area is located within the central part of the Perris Block, a relatively stable rectangular structural unit positioned between the Elsinore and San Jacinto fault zones (Morton, 2003; Morton et al., 2006).

The basement rocks in this region are part of a large assemblage known as the Peninsular Ranges Assemblage. Rocks of the assemblage date from the Paleozoic Era¹ to the present, with most associated with the Mesozoic-age² Peninsular Ranges batholith, as well as pre-batholithic metasedimentary and metavolcanic rocks into which the batholith was emplaced (Jahns, 1954; Morton et al., 2006). Cenozoic-age³ sedimentary rocks and deposits, mostly Quaternary in age, form thick deposits that rest unconformably above the basement rocks in the vicinity of the Project area (Morton et al., 2006).

The surficial geology of the Project area consists of middle to late Pleistocene-age old alluvial-fan deposits (Qof_a, subscript "a" denotes "arenitic") originating from the Peninsular Ranges to the southeast (Morton, 2003). The deposits include moderately indurated, commonly slightly dissected sand and gravel-bearing alluvium (Morton, 2003). The reddish-brown color can be indicative of ancient soils (i.e., paleosols) (Stewart and Hakel, 2016). A growing body of published and "gray" literature documents abundant significant vertebrate fossils from Pleistocene paleosols throughout Southern California in a variety of landscapes, from coastal areas to the inland valleys (e.g., Reynolds and Reynolds, 1991; Stewart et al., 2012; Raum et al., 2014; Stewart and Hakel, 2016, 2017, 2019)

According to Morton (2003), Quaternary valley deposits (Qv_{sc}, subscript "sc" denotes "silt and clay") are mapped in the active and recently active valley floor, to the north and northwest of the Project area. These deposits include unconsolidated sand, silt, and clay-bearing alluvium. These late Holocene deposits are generally too young geologically to preserve significant paleontological resources.

¹ Paleozoic Era: Approximately 541 to 252 million years ago (Cohen et al., 2020).

² Mesozoic Era: Approximately 252 to 66 million years ago (Cohen et al., 2020).

³ Cenozoic Era (formerly Tertiary): 66 million years ago to present, including the Quaternary Period (2.6 million years ago to present). The Quaternary Period is subdivided into the Pleistocene and Holocene epochs; Pleistocene Epoch, or last Ice Age, lasted from approximately 2.6 million to 11,700 years ago when the Holocene Epoch began (all dates according to Cohen et al. [2020]).



RECORDS SEARCH RESULTS

The records searches from the NHMLAC and WSC do not list any previously recorded fossil localities within the Project area, although several have been reported from the same sedimentary units as those mapped in and close to the Project area. Table 1 summarizes the records search results from the NHMLAC, WSC, previous records searches in the immediate area, and online databases.

Table 1
Fossil Localities Reported Near the Project Area

Locality No.	Geologic Unit (Date)	Taxon	Depth	Approximate Distance from Project Area
LACM ^{1, 3} VP 6059	Unknown formation (Pleistocene)	Camelops hesternus (camel, extinct)	Unknown	9 miles
LACM ¹ VP 7261	Unknown formation- arenaceous silt (Pleistocene)	Proboscidea (elephant order); Ungulate, unspecified	Unknown	13 miles
LACM ^{1, 4} VP 1207	Unknown formation (Pleistocene)	Odocoileus (deer)	Unknown	24 miles
LACM ¹ VP 7811	Unknown formation-tan eolian silt (Pleistocene)	Masticophis flagellum (coachwhip snake)	9–11 ft	33 miles
WSC ⁵	Unspecified alluvium (Pleistocene)	All extinct: <i>Mammut pacificus</i> (mastodon); <i>Mammuthus columbi</i> (mammoth); <i>Equus sp.</i> (horse); <i>Camelops hesternus</i> (camel); <i>Smilodon fatalis</i> (sabertooth cat), et al.	Unknown	< 10 miles
PBDB ² 200319	Unknown formation (Pleistocene)	Mammut pacificus (mastodon)	Unknown	3 miles

Source: ¹(Bell, 2021), ²PBDB ³McLeod (2019), ⁴McLeod (2017), Radford (2021)

The nearest previously recorded locality to the Project area is PBDB 200319, which is approximately 3 miles northwest of the Project area, also within the City of Perris. This locality yielded a specimen of *Mammut pacificus* (mastodon) at unknown depths that correlate to the Rancholabrean North American Land Mammal Age (NALMA).⁴

Among the NHMLAC collections, the closest locality is LACM 6059, southeast of Lake Elsinore. This locality yielded a specimen of *Camelops hesternus* (camel) at unknown depths. LACM 7261, south of the Project area at Skinner Reservoir, yielded a specimen of Proboscidea (elephant) and an unspecified

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⁴ Rancholabrean NALMA dates from less than 240,000 years to 11,200 years ago (Bell et al., 2004).



ungulate at unknown depths. Northwest of the Project area, between the cities of Corona and Norco, LACM 1207 yielded a specimen of *Odocoileus* (deer) from an unknown depth. Lastly, LACM 7811, farther northwest from the Project area than LACM 1207, yielded a fossil specimen of a coachwhip snake (*Masticophis flagellum*) at 9–11 feet bgs.

The WSC records search results indicate no fossil localities within the Project area. However, fossil localities have been reported from sedimentary units similar to those mapped within Project area (Radford, 2021). The largest known, non-asphaltic, open-environment late Pleistocene fossil assemblage is recorded less than 10 miles southeast of the Project area in the neighboring Diamond and Domenigoni valleys. Discovered during excavations at Diamond Valley Lake, this locality has yielded nearly 100,000 identifiable fossils representing over 105 vertebrate, invertebrate, and plant taxa (Springer et al., 2009).

The PBDB and UCMP online databases list numerous vertebrate, invertebrate, and plant fossil localities from Riverside County. However, only the PBDB lists the specimen of mastodon (*Mammut pacificus*), detailed above, within a 10-mile radius of the Project area. Neither database lists any invertebrate or plant fossils within the Project area or within a 10-mile radius.

Because of these results, Bell (2021) and Radford (2021) conclude that potentially fossil-bearing geologic units are present in the Project area either at the ground surface or in the subsurface. Therefore, shallow excavations through the middle to late Pleistocene alluvial deposits mapped by Morton et al. (2003) may encounter significant vertebrate fossil remains.

FINDINGS AND RECOMMENDATIONS

Æ used the City's (2008) sensitivity criteria to determine the paleontological potential of the Project area. When placed over the City's (2008) paleontological sensitivity map, the Project is primarily mapped in Area #2 (High Sensitivity), with the northern edge of the Project area in #5 (Low to High Sensitivity). Æ's desktop efforts and the museum and online records searches support these rankings, as middle to late Pleistocene old alluvial-fan deposits are mapped at the ground surface throughout the Project area with younger active valley deposits (late Holocene-age) adjacent to the north and northwest of the Project area.

Construction-related ground disturbance to a maximum depth of 15 feet bgs have a high likelihood of encountering fossil resources at unknown depths in previously undisturbed middle to late Pleistocene alluvial sediments. In accordance with the City's (2008) Implementation Measure IV.A.4, paleontological monitoring will be required during all ground disturbance in Area #2, and at depths below 5 feet bgs in Area #5. In accordance with Riverside County's (2015) *General Plan, Multipurpose Open Space (OS) Element Policy* OS 19.6, Æ recommends further paleontological resource management, including submittal of a paleontological resources impact mitigation program (PRIMP) prior to the commencement of construction. Æ also recommends Worker Environmental Awareness Program (WEAP) training for construction workers prior to ground disturbance in accordance with industry-wide best practices.



It has been a pleasure assisting you with this Project. If you have any questions, please do not hesitate to contact me at (626) 578-0119 x402.

Sincerely,

Melissa Macias Senior Paleontologist Applied EarthWorks, Inc.

Edited and Approved By:

arry L. Ollendon

Amy Ollendorf, Ph.D., M.S., RPA 12588

Paleontology Program Manager

Applied EarthWorks, Inc.

Encl. References



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Dist./Co./RTE.	08/RIV/215
PM/PM	
E.A.	
Project Sponsor	Riverside County
Project Title	I-215 Southbound Ramps/Bonnie Dr. Interchange Improvements
Project Description	Improve traffic operations at Bonnie Dr. and I-215 southbound ramps
	interchange.

Project Milestones

- ☑ Project was initiated on or after December 28,2018. Project Initiation Date:
- Project has/will achieve Caltrans Milestone 020 "Begin Environmental" before September 15,2020.

Milestone 020 Date:

Justification for why the project does not require an induced travel analysis (continue on page 2)

Project Description

The proposed project would add an additional one through lane and one dedicated right turn lane at the southbound I-215 off-ramp and one additional left turn lane at the northbound SR-74 at the intersection of SR-74 and Bonnie Drive. The project would also remove the right turn lane channelizing islands at SR-74 and Bonnie Drive intersection. The project would convert one eastbound left turn lane on Bonnie Drive into one eastbound right turn lane and one eastbound left turn lane. The project would also construct Class II bike lanes on both sides of Bonnie Drive and on both sides of SR-74 south of Bonnie Drive.

Existing Configuration	Proposed Changes to Lane Configurations		
I-215 Freeway Southbound Off-Ramp:	I-215 Freeway Southbound Off-Ramps:		
- One through off-ramp lane	 Add one additional through lane 		
 One channelized right turn lane 	- Remove right turn lane channelized		
	island		
	 Add one dedicated right turn lane 		
SR-74 Northbound at Bonnie Drive:	SR-74 Northbound at Bonnie Drive:		
 One through lane 	 Add one additional left turn lane 		
- One left turn lane onto Bonnie Drive	 Add Class II bike lanes on both sides 		
Bonnie Drive Eastbound at SR-74:	Bonnie Drive Eastbound at SR-74:		
 One left turn lane 	 One left turn lane onto southbound I-215 		
 One channelized right turn lane 	on-ramp and one right turn lane onto		
	SR-74		
	- Add Class II bike lanes on both sides		

Purpose & Need

The existing Interstae-215 is a 6-lane highway with 3 lanes of travel in each direction. SR-74 interchange consists of four ramps. Southbound off-ramp and southbound on-ramp meet at the intersection of SR-74 and Bonnie Drive with the intersection being signalized. Each of southbound ramps is a single lane of travel with an 8-foot wide shoulder on the right side of the travel lane. SR-74 south of Bonnie Drive consists of one lane on northbound direction and two lanes on southbound direction with an 8-foot wide shoulder in each direction. There is no existing sidewalk along Bonnie Drive or SR-74 at the intersection. The County of Riverside approved and certified an Environmental Impact Report for the proposed South Perris Logistics Center warehouse project. The 2,841 ksf proposed warehouse is located approximately 2 miles west of I-215 ramps and SR-74 interchange at the northeast corner of Ellis Avenue and Redlands Avenue.

To accommodate the increased traffic flow generated by the South Perris Logistics Center warehouse development now approved in the county, the project is required to make improvements to the I-215 southbound ramps and SR-74 intersection. The southbound off-ramp will be widened and the existing median will be removed to provide an additional through lane and a dedicated right turn lane at the intersection. In addition, the existing southbound right turn lane channelized island will be removed. SR-74 northbound will be widened slightly and the median will be shaved off to accommodate one additional left turn lane onto Bonnie Drive and class II bikes lanes on both sides. Eastbound right turn lane channelized island on Bonnie Drive will be also removed and replaced by a raised island as a berrier between travel lane and the proposed Class II bike lane. Turning radii at both northwest and southwest corners of the intersection will be decreased to slow down turning vehicles. Bonnie Drive at SR-74 will be re-striped to accommodate one dedicated eastbound left turn lane, one dedicated eastbound right turn lane and Class II bike lanes on both sides of the roadway.

The improvements are needed to ensure that the roadway network will be improved to facilitate better traffic circulation once traffic is realized from the South Perris Logistic Center development. In addition to the mentioned roadway improvements, signal modifications are proposed at the intersection of SR-74 and Bonnie Drive. Additional improvements include removing existing concrete pavement and construct new pavement on Bonnie Drive and I-215 southbound ramps, installing ADA compliant curb ramps on southweat, northwest, and northeast corners of the intersection, crosswalks on north and west legs, and green dashed bike lane at the intersection to facilitate left turn movements for northbound bicyclists.

Screened Out Reasoning

Per Caltrans VMT CEQA Significance Determinations for State Highway System Projects Implementation Timeline Memorandum (Timing Memo) (Caltrans 2020), projects initiated after December 28, 2018, and achieve Caltrans Milestone 020 "Begin Environmental" before September 15, 2020, will be evaluated on a project-by-project basis to determine if the project requires an induced travel analysis.

The project falls into the following project types that would not likely lead to a substantial or measurable increase in vehicle travel, and therefore generally should not require an induced travel analysis:

- The project proposes to reconfigure traffic lanes to include turn lanes.
- The project proposes to widen the local street and improve conditions for pedestrians and cyclists
- The project is proposing to install traffic signals and also proposing to optimized traffic signal timing.
- Timing of traffic signals to optimize vehicle, bicycle, and pedestrian flow.
- Reconstruction of enhanced pedestrian facilities within public rights-of-way.





Photo location: I-215 Southbound Off-Ramp at Bonnie Drive Looking North



Photo location: SR-74 Northbound at Bonnie Drive Looking South



Photo location: Bonnie Drive at I-215 Southbound Ramps Looking West

Attached Exhibits:

Figure 1: Proposed Conditions

Based on the project information provided, I	concur that the proje	ect will not require a	in induced trave
analysis.			

Caltrans Environmental Regional Coordinator concurrence ______. E-mail concurrence attached.

Environmental Branch Chief	Date	Deputy District Director	Date	