

From: Nayyar, Margo  
Sent: Thursday, December 17, 2015 2:57 PM  
To: CEQA Guidelines@CNRA  
Subject: Public Comment - Appendix G of the CEQA Guidelines update

Hello,

I'm a cultural resources specialist and wanted to provide public comment on the Appendix G of the CEQA Guidelines update.

I believe Alternative 3 accomplishes what AB52 directed OPR to accomplish with the initial study checklist update; however, I believe Alternative 3 means that the current cultural resource checklist will remain the same. What I'm really interested in seeing is the paleontological resources removed from the cultural resources checklist and given its own section.

AB52 directed OPR to update the sample initial study checklist in Appendix G of the CEQA Guidelines to do both of the following:

1. separate the consideration of paleontological resources from tribal cultural resources and update the relevant sample questions, and
2. add consideration of tribal cultural resources with relevant sample questions

I think numbers 1 and 2 above are accomplished with Alternative 3, but leaves paleontological resources within the cultural resources checklist. In the public comment meeting last week OPR commented that making paleontological resources separate from tribal cultural resources could be accomplished with a separate line item, but paleontological resources do not fit the definition of cultural resources, and I believe it belongs in its own section with initial study checklist.

The definition provided for cultural resources in the National Register of Historic Places and by the California Office of Historic Preservation include archaeological, Native American, traditional, and built environment resources including but not necessarily limited to buildings, structures, objects, districts, and sites. Cultural resources are tangible or observable evidence of past human activity. However, Paleontological resources, simply put, are fossils. And fossilized plants and animals do not symbolize past human activity.

As a cultural resources manager I am often requested to accomplish the paleontological review for projects, but I am completely unqualified. I believe by having paleontological resources removed from the cultural resource checklist there will be less confusion concerning who is qualified to complete a paleontological study and review.

Thank you for the opportunity to comment.

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