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December 18, 2015

VIA E-MAIL
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Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Re: Pacific Gas and Electric Company Comments on the Discussion Draft of Proposed Changes to Appendix G of the CEQA Guidelines incorporating tribal cultural resources

I. Introduction

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the Discussion Draft of Proposed Changes to Appendix G of the California Environmental Quality Act (CEQA) Guidelines incorporating tribal cultural resources (the Proposal) put forth by the Governor's Office of Planning and Research (OPR).

PG&E supports Alternative 1 of the Proposal, and is open to the addition of Alternative 2, Item D. PG&E's rationale for preferring Alternative 1 is provided below.

II. Alternative 1 Fulfills Statutory Requirement While Maintaining Appendix G Consistency

PG&E supports Alternative 1 of the Proposal as it maintains the format and simplicity of Appendix G of the CEQA Guidelines. Appendix G is not the venue to educate those using the checklist about the Public Resources Code (PRC), which can easily be referenced. The format of Alternative 1 is consistent with most other checklist items, and fulfils the statutory requirement set out by Assembly Bill (AB) 52.

Additionally, PG&E recognizes that OPR has worked diligently to refine and simplify the Appendix G checklist as part of a concurrent, comprehensive CEQA Guidelines update. Alternatives 2 and 3 of the Proposal increase the length and complexity of the checklist, which is contrary to the goals of OPR and inconsistent with the format of other checklist items.

III. Alternative 2, Item D Is Consistent with Statue and Format, and Could Be Included As Part of Alternative 1

PG&E supports OPR's revision to Item D in Alternative 2. The revision conforms the checklist item to the stipulations of AB 52, which alters the description of burial sites from "formal" to "dedicated," while maintaining the simple checklist format that relies on reference to the PRC.

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V. Conclusion

Again, PG&E appreciates the opportunity to provide feedback on the Proposal, and commends OPR staff for their sincere dedication to soliciting stakeholder feedback.

Sincerely,

/s/

Nathan Bengtsson