

From: Mark Roeder

Sent: Monday, October 12, 2015 11:45 AM

To: CEQA Guidelines

Subject: paleontology, on proposed changes to the current CEQA Checklist.

Mr. Chris Calfee

Reference: Proposed changes to the current CEQA Checklist in regard to paleontological resources

Thank you for effort in evaluating and improving the current CEQA guidelines. Recent law (AB 52) separated paleontological resources from cultural resources. It is proposed to place paleontological resources in in a general category of "Open Space, Managed Resources, and Working Landscapes". This placement would not afford paleontological resources the protection that a stand alone category would. Paleontological resources are very different cultural resources (ie. archaeology). Usually archaeological resources may be present in the topsoil while paleontological resources are buried in the underlying geological formations. Because of this, paleontological resources need different mitigation measures and personnel. Archaeological resources are usually mitigated prior to construction, while paleontological resources are mitigated during the earthmoving phase of construction. Fossils are usually found during grading. I would keep paleontology as a stand alone category and use the same language as in earlier versions of CEQA. Also, I would keep it as a separate category with archaeology and other related disciplines. Thank you.