

**From:** Joe Stewart  
**Sent:** Monday, October 12, 2015 6:51 AM  
**To:** CEQA Guidelines  
**Subject:** proposed changes to CEQA Guidelines

Dear Mr. Calfee,

Thank you for your efforts toward improving CEQA Guidelines. CEQA has had a massive positive effect in preserving that portion of the State's heritage constituted by Paleontological Resources, and citizens of California should be proud of that. California continues to be the cutting edge among state governments protecting Paleontological Resources.

I wish to comment on the proposed changes. I speak as a Qualified Paleontologist. I understand why Paleontological Resources should not be lumped with Cultural Resources. However, I see even less justification for placing Paleontological Resources in the category of Open Space, Managed Resources, and Working Landscapes. Preserving or protecting open spaces does nothing toward mitigating the effects of development on paleontological resources in areas that do not fall under Open Space. Paleontological Resources should be considered in the Guidelines as its own category; it is no more logically included under Open Space, Managed Resources, and Working Landscapes than it is under Cultural Resources. Many significant paleontological resources have been discovered and preserved in developed urban settings that were certainly neither open spaces nor working landscapes, unless all landscapes are considered to be working landscapes. An action could easily adversely affect paleontological resources without adversely affecting open spaces or working landscapes. Underground tunnels for subways are a good example.

I strongly urge that Paleontological Resources be considered as their own category within the CEQA Guidelines and that Paleontological Resources not be grouped with Open Space, Managed Resources, and Working Landscapes.

I thank you for your consideration of these points,