Duncan, Lia@CNRA Comment 2-13

From: Herrmann, Myra <MHerrmann@sandiego.gov>
Sent: Tuesday, June 21, 2016 6:33 PM
To: CEQA Guidelines@CNRA
Cc: Herrmann, Myra
Subject: City of San Diego comments on Proposed Amendments to the CEQA Guidelines, Appendix G
Attachments: City of San Diego comments on Proposed Amendments to the CEQA Guidelines, Appendix G

Importance: High

To whom it may concern:

The City of San Diego appreciates the opportunity to provide additional comments to your office on the proposed amendments to the CEQA Guidelines, Appendix G. We have reviewed the additional proposed amendments and have the following comments:

We concur with the proposal to add question #11 regarding the tribal consultation process to the beginning of Appendix G under the heading "Evaluation of Environmental Impacts". We agree that adding the question will ensure that planners of all levels have complied with the provisions of CEQA at the earliest point in the process for their respective projects and that the results of the tribal consultation process then be included in the initial study discussion to support the significance determination box that would be checked. 2-13.1

There appears to be an error in Section V.b) which shows a deletion of the "1" in CEQA section 15064.5. This should be corrected before approval of the amendments to the checklist. 2-13.2

We support the edit to question "d" replacing the word "formal" with "dedicated" and agree that the change will provide clarity to agency staff, applicants and consultants when completing the initial study checklist. 2-13.3

While we support the addition of a new Section in the Initial Study checklist specific to Tribal Cultural Resources, we are unclear as to why this new section is being moved to the back of the Initial Study Checklist. Having the new section either directly before or after the Cultural Resources section would provide flow of discussion since some of the information would be sourced from a cultural report or other source materials and would be supported in both section discussions. We also do not believe that the new question "a" needs to be expanded as proposed. No other CEQA sections are further described as shown in the Cultural Resources section. For the sake of consistency, the City believes that the question can stand alone as follows: "Would the project cause a substantial adverse change in the significance of a tribal cultural resource as further defined in Public Resources Code Section 21074?" The expanded language can already be easily found in the CEQA statutes for further reference, clarification or direction and does not necessarily require repeating herein. 2-13.4

Thank you for the opportunity to provide additional comments on this item. I have included our previous comments for reference. We look forward to seeing the final version.

Please feel free to contact me if you have any questions in response to my comments.

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