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**Subject:** Modifications to Text of Proposed Regulation and Addendum to the Initial Statement of Reasons and Informative Digest OAL Notice File No. Z-2018-0116-12 - Paleontological Resources  
**Date:** Wednesday, July 18, 2018 6:14:48 PM  
**Attachments:** [image003.jpg](#)

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Greetings Mr. Calfee,

I am Caltrans' statewide coordinator for paleontological resource issues and am commenting on the proposal to move the Appendix G question regarding paleontological resources from the Cultural section to Geology. While this would be an improvement, I recommend that paleontological resources and unique geologic features be treated separately as a standalone section in the CEQA checklist of Appendix G instead. Paleontology is a subset of geology however, the types of concerns addressed in the current geology section are really about public safety, while the question regarding paleontological resources and unique geologic features is about protecting scientific resources that belong to the public. These issues and the goals of their related questions are very different. As a reviewer of environmental documents, I am concerned that if preparers see that paleontological resources and unique geologic features are included in the existing geology section of the CEQA checklist they will be inclined to include the discussion of these scientific resources with their discussion of faults, earthquake and landslide potential, etc. This would lead to confusion and may result in inadequate coverage of the resource issues.

Thank you for considering my comment.

*Kim Christmann*

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