

March 12, 2018

Mr. Christopher Calfee
Deputy Secretary and General Counsel
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Dear Mr. Calfee:

I am writing to comment on proposed updates to the CEQA review process, and the treatment and protection of California's Paleontological Resources under CEQA. I recommend that they be treated separately as a standalone item in the CEQA checklist of Appendix G.

Paleontological Resources are the remains and behavioral traces of ancient organisms (fossils), and addressed as a Cultural Resources issue in Appendix G. Combining Paleontological Resources with Cultural Resources has often caused confusion to agency personnel and to citizens. However, the decision to consider Paleontological Resources as a Geology and Soils issue will not significantly improve the treatment of Paleontological Resources, and may make matters worse.

The management of Paleontological Resources is best thought of as management of ancient Biological Resources. Management of Paleontological Resources should not be addressed under the Biological Resources issue, but their management should be treated as a new and separate issue during the CEQA review process. For purposes of recognition and clarification, I recommend that Paleontological Resources be added to the Appendix G checklist as a new, standalone environmental issue.

As written the only impacts to be considered for Paleontological Resources are impacts to "*unique paleontological resources*" [undefined], rather than to "Significant" Paleontological Resources. Additionally, the definition of "paleontological resource," "resource potential," and "significance" can be extracted from the Society of Vertebrate Paleontology Bull., 163, January, 1995. With this recommendation, I propose the following language:

Would the project:

Directly or indirectly cause a substantial adverse effect on a significant paleontological resource or resource area?

I strongly urge you to consider the above recommendations for the increased protection and preservation of California's rich paleontological record.

Thank you for the opportunity to comment on the proposed updates to the CEQA review process.

Sincerely,



Robert E. Reynolds

Past Chair: SVP Conformable Impact Mitigation Committee
Past Curator, Earth Science, San Bernardino County Museum
Author: Riverside and San Bernardino County Guidelines for Conformable Impact Mitigation