

## Lockey, Heather@CNRA

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**From:** Jeannie Lee <Jeannie.Lee@OPR.CA.GOV>  
**Sent:** Wednesday, March 14, 2018 12:40 PM  
**To:** Calfee, Christopher@CNRA; CEQA Guidelines@CNRA  
**Subject:** Fwd: letter  
**Attachments:** MOW LTR TO CNRA 3 13 2018.docx; ATT00001.htm

Begin forwarded message:

**From:** Mike Woodburne <[mikew@npgcable.com](mailto:mikew@npgcable.com)>  
**Date:** March 14, 2018 at 10:26:31 AM PDT  
**To:** <[Jeannie.Lee@OPR.CA.GOV](mailto:Jeannie.Lee@OPR.CA.GOV)>  
**Cc:** michael woodburne <[mikew@npgcable.com](mailto:mikew@npgcable.com)>  
**Subject:** letter  
**Reply-To:** Mike Woodburne <[mikew@npgcable.com](mailto:mikew@npgcable.com)>

Dear Jeannie,  
I attach my letter to Christopher Calfee.

Thank you,  
Michael Woodburne

March 13, 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. Lumping of Paleontological Resources with Cultural Resources has often caused confusion to both agency personnel and 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,

Michael O. Woodburne  
Professor Emeritus, Department of Earth Sciences, University of California, Riverside  
Past President, Society of Vertebrate Paleontology  
Honorary Curator, Museum of Northern Arizona, Flagstaff