

From: James Allen
To: CEQA_Guidelines@CNRA
Subject: Paleontology
Date: Friday, May 18, 2018 10:27:38 AM
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Dear Mr. Calfee:

I think I may have missed the March deadline for comments about what to do with paleo under CEQA. I think Lanny Fisk and Tom Demere have responded in the utmost. If it's not too late, I would like to say one item.

I have been doing paleo resources CEQA protection since 1997, when I was still an undergrad in Geology at Sonoma State. I was working for archeologists at that time. In 2003 thereabouts, I received a letter from the State stating "cease and desist" from conducting paleo resources without a license. So, I stopped, took my tests and got registered by 2007.

My concern at present are museums. I love museums, but I need them to stay and act like museums and not infringe on private sector paleontological consulting. To me, that is double dipping. UCMP and other museums have clearly seen how to cash in on conducting paleontological resources consulting while also being paid museum faculty. Museum's jobs are to curate and teach, and remain involved only as a qualified museum repositories for when significant, non-renewable fossils are encountered during a grading project.

I think that being a Registered/Professional Geologist should remain the qualifying factor. Just as I had to get registered to conduct paleo consulting, so should everyone else.

Some may argue paleo has nothing to do with Geology, or the Geology license. That is a travesty. Paleo (fossils) are found nowhere else...but in the Geology. The flawed argument is similar to saying "mineralogy has nothing to do with Geology", and as I am sure you know, minerals are only found in Geology.

Being a P.G. as a requirement for CEQA Paleontological Resources Protection must be a requirement. I would also argue the importance of museums, which is huge, but only to remain as qualified repositories for when significant fossils are found.

Thanks Chris,

Jim

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Geologist - Paleontology



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