

Comment 1-1

**City of San Diego comments on Proposed Amendments to the CEQA Guidelines, Appendix G**

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**Sent:** Saturday, April 02, 2016 5:25 PM  
**To:** CEQA Guidelines@CNRA  
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**Importance:** High

To whom it may Concern:

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

We concur with the proposal to add a 10<sup>th</sup> statement to the beginning of Appendix G under the heading "Evaluation of Environmental Impacts". We agree that adding a statement will provide further direction to planners of all levels when preparing the initial study checklist for their projects. However, by the time an environmental analyst is preparing their initial study one would assume they have already initiated the tribal consultation process in accordance with PRC Section 21080.3.1. We believe that the informational language should be providing direction to include the results of the tribal consultation process and could be revised to state that the information provided during the tribal consultation process should be included in the initial study discussion to support the significance determination box that would be checked.

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We support the edits to question "d" and agree that the change will provide clarity to agency staff, applicants and consultants when completing the initial study checklist.

We support the addition of a new question in the Initial Study checklist within Section V. Cultural Resources. However, we do not believe that the new question "e" needs to be expanded as proposed. No other CEQA sections referenced in the Cultural Resources section are further described. For the sake of consistency, the City believes that the question can stand alone as follows: "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.

1-1.2

Thank you for the opportunity to provide comments on this item. 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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