

**From:** John Vang [jvang@placeworks.com]  
**Sent:** Monday, June 01, 2015 5:32 PM  
**To:** CEQA Guidelines@CNRA  
**Subject:** Discussion Draft AB 52 Technical Advisory Comments

To Whom It May Concern,

Below you will find comments regarding the Discussion Draft AB 52 Technical Advisory.

1) It is likely that many tribes will not have adequate lead agency information (not required to be provided by the NAHC until July 1, 2016) to request project notification in a timely manner. During the interim period between July 1, 2015 and the date on which tribes will be provided comprehensive lead agency lists, is it safe for lead agencies to assume consultation is not required with tribes who have not submitted a request to be notified?

2) What is the recommended approach regarding consultation for ND's/MND's that were initiated before July 1, 2015 for which the NOI will be released subsequent to this date? Would the consultation process requirement be dependent on whether there are any tribes that have submitted a request to be placed on the lead agency's notification list prior to project initiation? For example, a tribe requests project notification after July 1<sup>st</sup>, but the project was underway prior to July 1<sup>st</sup>. For this type of scenario, should agencies seek out applicable tribes for consultation or evaluate impacts without tribal input?

Thank you,

**JOHN VANG, JD**  
Project Planner



3 MacArthur Place, Suite 1100 | Santa Ana, California 92707  
714.966.9220 | jvang@placeworks.com | placeworks.com

*The Planning Center/DC&E is now PlaceWorks. Please update your records.*