

From: [Rachel White](#)
To: [CA Advisory Committee on Geographic Names](#)
Cc: [REDACTED]
Subject: [External] Public Comment Opposing Draft CACGN Regulations (March 6, 2026)
Date: Friday, April 10, 2026 10:31:12 AM
Attachments: [6March2026CACGNDraftReqs.pdf](#)

Dear Members of the California Advisory Committee on Geographic Names (CACGN),

I am writing to submit formal public comment opposing the March 6, 2026 draft regulations concerning the petition process for renaming “offensive and derogatory” geographic features and place names.

While I recognize and respect the intent to address genuinely harmful or discriminatory place names, the proposed regulations, as currently drafted, present serious legal, constitutional, and procedural concerns that warrant substantial revision before adoption.

First, the definition of “offensive and derogatory” in Section 1001(g) is impermissibly vague and overly broad. It relies on subjective concepts such as “perceived association,” “stereotypes,” and “pejorative ideology,” without providing objective criteria or evidentiary standards. This lack of clarity fails to provide adequate notice of what qualifies as actionable and invites arbitrary and inconsistent enforcement, raising significant due process concerns under the Fourteenth Amendment.

Second, the use of a “reasonable person” standard in Section 1006(c) is insufficiently defined and improperly applied in this context. Without clear guidelines, this standard risks devolving into a majoritarian or politically influenced determination of offensiveness, rather than a consistent legal analysis. This creates instability and unpredictability in outcomes, particularly as social norms evolve over time.

Third, the regulations raise serious First Amendment concerns by allowing removal of place names based on perceived ideological or historical associations with individuals. Section 1001(g)(3), in particular, permits action based on broad and subjective interpretations of historical conduct. This approach risks viewpoint-based decision-making and politicization of historical interpretation, rather than neutral administrative governance.

Fourth, the procedural safeguards provided are inadequate. The regulations do not establish clear evidentiary standards, burdens of proof, or meaningful opportunities for affected parties to respond or challenge assertions. The appeals process outlined in Section 1012 is limited and discretionary, lacking independence and sufficient protection for those impacted by renaming decisions.

Fifth, the standing provisions in Section 1002 are overly expansive. Allowing petitions from individuals outside California based on speculative or “anticipated” impacts opens the process to misuse, including ideological or mass petition campaigns, rather than ensuring that petitions are grounded in concrete and demonstrable harm.

Sixth, the regulations grant broad discretionary authority to the Committee and the Secretary without sufficient limiting principles. This raises concerns regarding improper delegation of authority and increases the risk of inconsistent or arbitrary decision-making.

Seventh, the criteria for replacement names in Section 1009, while well-intentioned, introduce content-based preferences that may undermine viewpoint neutrality. Government processes should avoid privileging particular categories of expression or cultural perspectives over others without clear statutory direction.

Finally, the enforcement provisions in Section 1014 impose potentially burdensome obligations on public agencies without clear procedural protections, timelines tied to practical feasibility, or consideration of resource constraints. This creates the risk of unfunded mandates and operational disruption.

For these reasons, I respectfully urge CACGN to withdraw or substantially revise the proposed regulations. At a minimum, revisions should:

- Provide clear, objective, and narrowly tailored definitions;
- Establish consistent evidentiary standards and burdens of proof;
- Strengthen procedural due process protections;
- Limit standing to individuals or entities demonstrating concrete harm;
- Constrain agency discretion with clear and enforceable standards; and
- Ensure viewpoint neutrality in both evaluation and replacement naming criteria.

Thank you for the opportunity to provide public comment on this important matter. I encourage the Committee to carefully consider these concerns to ensure that any final regulations are legally sound, fair, and durable.

Sincerely,

Rachel White
Kelseyville, California



CALIFORNIA NATURAL RESOURCES AGENCY
TITLE: PETITION PROCESS FOR
RENAMING OFFENSIVE AND
DEROGATORY PUBLIC
GEOGRAPHIC FEATURES OR PLACE NAMES
NAMES
DIVISION
CHAPTER

DRAFT TEXT OF PROPOSED REGULATIONS

Article 1. General Provisions

§ 1000. Applicability and Scope.

This chapter shall be known as the California Natural Resources Agency's (Agency) Petition Process for Renaming Offensive and Derogatory Public Geographic Features or Place Names. These regulations apply to all petitions made to the Agency's California Advisory Committee on Geographic Names (CACGN) for purposes of seeking review and possible public name change pursuant to Chapter 17 (commencing with § 8899.90) to Division 1 of Title 2 of the Government Code.

Note: Authority cited: Sections 8899.90, Government Code. Reference: Sections 8899.90, 8899.94 (a).

§ 1001. Definitions

The following definitions shall apply for the purposes of this Chapter:

(a) "California Advisory Committee on Geographic Names" or "CACGN" or "Advisory Committee" or "Committee" means the working group of state employees established within the California Natural Resources Agency through appointment by the Secretary of Natural Resources for purposes of providing advice and recommendation on public Geographic Features or Place Names located in California.

(b) "California Native American Tribe" means tribes located in California which are either recognized by the federal government pursuant to the annual list published under the Federally Recognized Indian Tribe List Act of 1994 (25 U.S.C. Sec. 5131) in the Federal Register or non-federally recognized.

- (c) “California Natural Resources Agency” means the cabinet level agency established pursuant to Government Code sections 12800 and 12805.
- (d) “Geographic Feature” means any location or publicly owned structure in California, including, but not limited to, navigable waters of the state, geographic features, parks, state or local roads, bridges, and publicly owned buildings.
- (e) “Notice of Determination” means a document stating the rejection or acceptance of a Petition for a Geographic Feature or Place Name.
- (f) “Notice of Receipt of Petition” means a document stating the Agency has received a Petition.
- (g) “Offensive and Derogatory” means:
- (1) Names with slurs or insults towards any classification of person identified in in Civil Code Section 51, or that perpetuate stereotypes or other pejorative ideology.
 - (2) Names that represent expressions of prejudice towards any class of person identified in Civil Code Section 51.
 - (3) Names honoring or with association or perceived association to specific people, past or present, who: Perpetuated or committed violence including but not limited to, rape, murder, genocide, forced relocation, internment, or human trafficking against any classification of person identified in in Civil Code Section 51.
- (h) “Petitioner” means a person or entity identified in Section 1002(a) who submits a Petition to rename an Offensive and Derogatory Geographic Feature or Place Name.
- (i) “Park” means any publicly owned or managed land primarily undeveloped and intended, at least in part, to preserve natural, scenic, or historic resources or to provide public recreational opportunities.
- (j) “Place” means any natural geographic feature or street, alley, or other road within the jurisdiction of the state or political subdivision of the state.
- (k) “Public Agency” means a California state agency, local governing body, and any other political subdivision of the State of California that has direct jurisdiction over or ownership of the Geographic Feature or Place Name.
- (l) “Secretary” means the Secretary of the Natural Resources Agency consistent with Public Resources Code sections 12800 and 12805.
- (m) “Supporting documentation” means sources in literature, web links, or news articles that

can be verified by third parties as to their accuracy or completeness.

Note: Authority cited: 8899.91, Government Code. Reference: Sections 8899.91, Government Code. Reference: Section 51, Civil Code, Section 12926(i),(s), Government Code.

Article 2. Petition Process

§ 1002. Geographic Features or Place Names Subject to Petition.

(a) The following persons or entities may Petition to identify an Offensive and Derogatory Geographic Feature or Place Name:

(1) California Native American tribes;

(2) Public Agencies;

(3) Natural persons who can establish residency in California at the time of filing a Petition, or natural persons who live outside of California at the time of filing a Petition, but who can demonstrate a personal or legal impact has occurred or will occur as the result of an Offensive or Derogatory name. A personal or legal impact that could result from an Offensive or Derogatory name include, but are not limited to, having or anticipating having a legal residence in a Place with an Offensive or Derogatory mailing address, owning a business or subsidiary with an Offensive or Derogatory mailing address, burying a relative in a District with an Offensive or Derogatory name, or having relatives who have lived in a Place with an Offensive or Derogatory Name;

(4) Legal entities, such as corporations, trusts, and other non-natural persons who have filed a tax return with the California State Franchise Tax Board in the year proceeding the Petition;

(5) Voting member of the Committee during their tenure on the Committee.

(b) Only public Geographic Features or Place Names within the jurisdiction of a Public Agency may be the subject of a Petition consistent with Government Code § 8899.94

(b)(2).

Note: Authority cited: Section 1(c), Government Code. Reference: Sections 8899.91 (b), Government Code.

§ 1003. Required Contents of a Petition.

(a) All Petitions to identify an Offensive and Derogatory Geographic Feature or Place Name shall include:

- (1) Name and contact information of the Petitioner.**
 - i. Contact information shall include an electronic mail address and phone number.**
 - ii. An electronic mail that is returned or an electronic mail address not functioning may delay the processing of the petition or may result in denial of the petition.**
- (2) The current name of the Geographic Feature or Place Name being proposed as Offensive and Derogatory.**
- (3) Location of the Geographic Feature or Place Name, including a map and the latitude and longitude that clearly identifies the location of the Geographic Feature or Place.**
- (4) A list of all Public Agencies with jurisdiction over the Geographic Feature or Place Name if known to Petitioner, or if unknown a statement identifying that Petitioner is not aware of the public entities with specific jurisdiction.**
- (5) Relevant history of the Geographic Feature or Place Name, including citations and supporting documentation of the relevant history. Relevant history may include history of the origin of the current name, meaning of the name, how long the name has been in use, and the historical significance of the name.**
- (6) Self-attestation under penalty of perjury that the Petitioner meets the requirements under Section 1002 (a).**
- (7) Justification why the Geographic Feature or Place Name is Offensive and Derogatory as defined in Section 1001.**
- (8) Engagement that has been done to date by the Petitioner with potentially affected Public Agencies, entities, tribes and members of the public.**

(9) Other narrative explanation from Petitioner about the basis of the Petition.

(b) All submitted documentation shall be legible.

Note: Authority cited: Sections 8899.90 (b), Government Code. Reference: Sections 8899.94 (a)(2), Government Code.

§ 1004. Submission of a Petition.

(a) Petitioners shall provide all information requested in Section 1003 for the Petition to be considered complete. Failure to provide the information may delay the processing of the Petition or may result in denial of the Petition.

(b) Petitions shall be submitted electronically to the Committee as indicated on the California Natural Resources Agency's website.

(c) A Notice of Receipt of the Petition will be sent to the Petitioner through the contact information provided in the Petition.

Note: Authority cited: Sections 8899.90 (b), Government Code. Reference: Sections 8899.94 (a)(2), Government Code.

§ 1005. Committee Staff Petition Evaluation.

(a) A Petition may be rejected on the following bases, including but not limited to:

(1) Illegible documentation.

(2) Required information as stated in Section 1003 has not been provided.

(3) Invalid email address or contact information.

(4) Petition requests the Committee change the names of private places or private geographic features, including but not limited to private roads, private businesses, or private signs not under any Public Agency jurisdiction.

(5) Petition requests the Committee change the names of Geographic Features or Place Names solely within the authority of the federal government.

(b) Committee staff will notify the Petitioner through electronic mail if a Petition is incomplete or if there are any deficiencies in the Petition or information provided.

(1) The Petitioner shall provide the requested corrections and additional information to Committee staff within 30 calendar days of the notification, or the Petition may be rejected.

- (c) Committee staff or Committee members shall conduct tribal consultations regarding all completed Petitions as consistent with the Agency's Tribal Consultation Policy.
- (d) Committee staff or Committee members shall consult with the responsible and affected Public Agencies on completed Petitions.
- (e) After completing consultations, Committee staff will send its recommendation and information on how to participate in the public CACGN meeting where the Committee will review the Petition to the Petitioner, potentially effected California Native American tribes, and the Responsible Public Agency.

Note: Authority cited: Sections 8899.90 (b), Government Code. Reference: Sections 8899.94 (a)(2), Government Code.

§ 1006. Committee Consideration of Petitions

- (a) Committee staff shall present a list of completed Petitions to the Committee during a public meeting.
- (b) The Committee shall consider the following criteria to determine approval or disapproval of a Petition:
 - (1) The Geographic Feature or Place Name meets the definition of Offensive and Derogatory as stated in Section 1001.
 - (2) Petition meets the standards for accepted Petitions as stated in Sections 1002, 1003 and 1004 of these regulations.
- (c) After hearing from Committee staff, the Petitioner, the Responsible Public Agencies, California Native American tribes, and the public, the Committee shall make a finding as to whether a reasonable person would find the Geographic Feature or Place Name Offensive and Derogatory. If a majority of the Committee finds that the Geographic Feature or Place Name is Offensive and Derogatory, it shall proceed to subpart (d) of this Section. If a majority of the Committee do not find that the Geographic Feature or Place Name is Offensive and Derogatory, the Committee shall reject the Petition.
- (d) The Committee or Committee staff shall subsequently transmit the results of the Committee vote, finding a Geographic Feature or Place Name to be Offensive and Derogatory, to the Secretary of the Natural Resources Agency. The Secretary shall have 30 days to concur with the

Committee or independently reject the Petition. If the Secretary takes no action after 30 days, the Petition shall be deemed accepted.

- (e) Upon the Committee's vote and Secretary's approval of a determination of a Geographic Feature or Place Name as Offensive and Derogatory, Committee staff shall send to the Petitioner and Responsible Public Agency a Notice of Determination.

Note: Authority cited: Section 8899.90, Government Code. Reference: Sections Section 8899.90, Government Code.

Article 3. Identification of Same or Similar Determined Offensive and Derogatory Names

§ 1007. Process for Identifying Same or Similar Determined Offensive and Derogatory Names

- (a) Geographic Features or Place Names identified and approved as Offensive and Derogatory through the Petition process identified in Sections 1002 through 1006 above shall be considered for potential duplicity throughout the State.
- (b) The Committee shall solicit input from members of the public, California Native American tribes, and Public Agencies regarding other same or similar names located in California and under Public Agency jurisdiction for a period of 120 calendar days.
- (1) Submittals for same or similar Offensive and Derogatory Geographic Features or Place Names must come from a person or entity as consistent with Section 1002.
- (2) Submittals for same or similar Offensive and Derogatory Geographic Features or Place Names must also include the same information required in Section 1003(a)(1)-(4) and shall be submitted using the same means as those identified in Section 1004.
- (c) Upon receipt of a submittal for a same or similar Offensive and Derogatory Geographic Feature or Place Name, Committee staff shall send a notice of receipt.
- (d) After the 120 calendar day solicitation period has passed, Committee staff shall notify and coordinate with Responsible Public Agencies to identify and approve replacement names following the process as stated in Article 4.

Article 4. Process for Identifying and Approving Replacement Names

§ 1008. Identifying Replacement Names for Approved Offensive and Derogatory Geographic Features or Place Names

(a) Committee staff or Committee members shall conduct tribal consultations regarding all approved Petitions as consistent with the Agency’s Tribal Consultation Policy. Committee staff or Committee members shall notify and coordinate with Responsible Public Agencies as well as potentially affected state agencies to identify replacement names for approved Offensive and Derogatory Geographic Features or Place Names.

(1) Upon such notice, the Responsible Public Agency shall propose at least one replacement name to the Committee within 180 calendar days of receiving the Notice of Determination by the Committee.

- i. Replacement names shall adhere to the criteria identified in Section 1009.
- ii. The responsible Public Agency shall consult with potentially effected California Native American tribes to solicit replacement name proposals.
- iii. The responsible Public Agency shall provide guidance on pronunciation and meaning of proposed replacement names.

(2) If replacement names are not provided by the Public Agency within the 180 calendar days, or the replacement names are deemed to be Offensive and Derogatory by the Committee using the criteria listed in Section 1001 (g), the Committee shall solicit replacement names and input from the following:

- i. California Native American tribes,
- ii. Appropriate Public Agencies, and
- iii. Members of the public.

(b) The Committee shall review and approve or reject replacement names in accordance with the criteria stated in §1009.

(c) The Committee shall provide an opportunity for the public to provide comments during a public meeting for which replacement names for the Offensive and Derogatory Geographic Feature or Place Name are being considered.

- (d) After review and public comment, the Committee shall vote on a recommendation of proposed replacement names. The Committee or Committee staff shall subsequently transmit the results of the Committee vote, recommending one or more replacement names, to the Secretary of the Natural Resources Agency. The Secretary shall have 30 days to concur with the Committee or independently reject the recommended replacement names. If the Secretary takes no action after 30 days, the replacement name(s) shall be deemed accepted.
- (e) Upon the Committee's vote and Secretary's approval of a replacement name for an Offensive and Derogatory Geographic Feature or Place Name, the Committee or Committee staff shall notify the Responsible Public Agency.
- (f) The Responsible Public Agency shall formally adopt an approved replacement name within 365 days of Committee communication of the decision in Section 1008(f).
- (1) Extensions may be granted by the Committee upon request for reasonable cause. Reasonable cause may include, but is not limited to, natural disasters, established name change processes that require longer periods, or other causes outside a Responsible Public Agency's control.
- (g) Responsible Public Agencies shall coordinate with emergency response, mapping entities, and any additional departmental entities, as appropriate, to reflect the approved name changes in maps, signs, interpretive markers, and databases where the Geographic Feature or Place Name is recorded.
- (1) Additional information on coordinating with the entities mentioned in section 1008(h) is available on the California Natural Resources Agency's website.

Note: Authority cited: Section 8899.90 (b), Government Code. Reference: Sections Section 8899.94, Government Code.

§ 1009. Criteria for Approving a Replacement Name

- (a) When selecting replacement names, the Committee shall prioritize:
- (1) Names that do not refer to a specific person.
- (2) Names that honor and recognize California Native American tribes, tribal culture, and indigenous languages specific to the geographic region in question, including place names that were previously used by California Native American tribes.

(b) The Committee shall consider input received from California Native American tribes, Public Agencies, and affected members of the public.

(c) The replacement name shall not be Offensive or Derogatory as stated in Section 1001.

Note: Authority cited: Section 8899.94, Government Code. Reference: Sections Section 8899.94, Government Code.

§ 1010. Public Name Changes Independent of Petition Process

(a) Nothing in this Division is intended to prevent Public Agencies from independently adopting, modifying, or changing Geographic Features or Place Names under their jurisdiction that are consistent with existing law as well as the regulations in this Article.

Note: Authority cited: Section 8899.94, Government Code. Reference: Sections Section 8899.94, Government Code.

§ 1011. Committee Record, Findings, and Decision

(a) Once the Committee and Secretary have made a decision to reject or accept a Petition or replacement name, no further deliberations are needed by the Committee on the Geographic Features or Place Names in question.

(b) Final decisions on replacement names shall be recorded and made available to the public.

Note: Authority cited: Section 8899.95, Government Code. Reference: Sections Section 8899.95, Government Code.

§ 1012. Appeals to the Secretary

(a) Petitioners can appeal rejected Petitions and all recommended replacement names to the Secretary.

(b) The Committee has the discretion to determine if a rejected Petition should be reviewed again for completeness.

Note: Authority cited: Section 8899.94, Government Code. Reference: Sections Section 8899.94, Government Code.

Article 5. Public Comment

§ 1013. Right to Comment.

(a) Any persons or entities stated in Section 1002(a) may submit written or oral comments relevant to a proposed Petition or renaming proposal to the Agency.

Note: Authority cited: Section 8899.92, Government Code. Reference: Sections Section 8899.94 (2), Government Code.

Article 6. Remedies and Enforcement

§ 1014.

(a) Once a Public Geographic Feature or Place Name has been deemed Offensive and Derogatory by the Committee and approved by the Secretary of the Natural Resources Agency, a Public Agency shall no longer replace any sign, interpretative marker, or any other marker or printed material with the discontinued name.

(b) The Committee shall issue a notice of non-compliance for any failure by a Responsible Public Agency to replace a newly instated signs, markers, or other public insignia within 90 days of receiving a notice for non-compliance. The Committee shall seek any remedy and take any enforcement action available to it by law for any of the following, including, but not limited to:

- a. Failure of a Responsible Public Agency to comply with a final name-change decision falling under these regulations, or
- b. Maintenance of signs or other markers in contravention of a final name change decision or maintenance of signs or markers that otherwise retain an Offensive and Derogatory name in a space over which a Public Agency has direct jurisdiction or ownership.

Note: Authority cited: Section 1, and 8899.93, Government Code. Reference: Sections Section 8899.93 (a), Government Code.

From: [John Jenkins](#)
To: [FGG, Public Comment](#)
Subject: [External] Rein in the Sheriff
Date: Friday, April 10, 2026 5:41:29 AM

- **Enforce Policy L-2:** Uphold the CLEAR Ordinance as adopted by the Board of Supervisors.
- **Monthly Transparency Reporting:** Beginning in 2026, publish monthly Values Act transfer data on the Sheriff's public website.
- **End ICE Transfers:** Follow the lead of Contra Costa, Los Angeles, San Francisco, and other California counties that have ended all transfers of individuals to ICE.
- **Ban ICE from County Property:** Prohibit ICE access to all county facilities — including parking lots, sally ports, and non-public areas — and post public signage reflecting CLEAR Ordinance protections.

John Jenkins

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Article 2. Petition Process

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(2) Public Agencies;

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(4) Legal entities, such as corporations, trusts, and other non-natural persons who have filed a tax return with the California State Franchise Tax Board in the year proceeding the Petition;

(5) Voting member of the Committee during their tenure on the Committee.

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§ 1003. Required Contents of a Petition.

(a) All Petitions to identify an Offensive and Derogatory Geographic Feature or Place Name shall include:

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- (2) The current name of the Geographic Feature or Place Name being proposed as Offensive and Derogatory.**
- (3) Location of the Geographic Feature or Place Name, including a map and the latitude and longitude that clearly identifies the location of the Geographic Feature or Place.**
- (4) A list of all Public Agencies with jurisdiction over the Geographic Feature or Place Name if known to Petitioner, or if unknown a statement identifying that Petitioner is not aware of the public entities with specific jurisdiction.**
- (5) Relevant history of the Geographic Feature or Place Name, including citations and supporting documentation of the relevant history. Relevant history may include history of the origin of the current name, meaning of the name, how long the name has been in use, and the historical significance of the name.**
- (6) Self-attestation under penalty of perjury that the Petitioner meets the requirements under Section 1002 (a).**
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(9) Other narrative explanation from Petitioner about the basis of the Petition.

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§ 1004. Submission of a Petition.

(a) Petitioners shall provide all information requested in Section 1003 for the Petition to be considered complete. Failure to provide the information may delay the processing of the Petition or may result in denial of the Petition.

(b) Petitions shall be submitted electronically to the Committee as indicated on the California Natural Resources Agency's website.

(c) A Notice of Receipt of the Petition will be sent to the Petitioner through the contact information provided in the Petition.

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§ 1005. Committee Staff Petition Evaluation.

(a) A Petition may be rejected on the following bases, including but not limited to:

(1) Illegible documentation.

(2) Required information as stated in Section 1003 has not been provided.

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(4) Petition requests the Committee change the names of private places or private geographic features, including but not limited to private roads, private businesses, or private signs not under any Public Agency jurisdiction.

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- (b) The Committee shall consider the following criteria to determine approval or disapproval of a Petition:
 - (1) The Geographic Feature or Place Name meets the definition of Offensive and Derogatory as stated in Section 1001.
 - (2) Petition meets the standards for accepted Petitions as stated in Sections 1002, 1003 and 1004 of these regulations.
- (c) After hearing from Committee staff, the Petitioner, the Responsible Public Agencies, California Native American tribes, and the public, the Committee shall make a finding as to whether a reasonable person would find the Geographic Feature or Place Name Offensive and Derogatory. If a majority of the Committee finds that the Geographic Feature or Place Name is Offensive and Derogatory, it shall proceed to subpart (d) of this Section. If a majority of the Committee do not find that the Geographic Feature or Place Name is Offensive and Derogatory, the Committee shall reject the Petition.
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Committee or independently reject the Petition. If the Secretary takes no action after 30 days, the Petition shall be deemed accepted.

- (e) Upon the Committee's vote and Secretary's approval of a determination of a Geographic Feature or Place Name as Offensive and Derogatory, Committee staff shall send to the Petitioner and Responsible Public Agency a Notice of Determination.

Note: Authority cited: Section 8899.90, Government Code. Reference: Sections Section 8899.90, Government Code.

Article 3. Identification of Same or Similar Determined Offensive and Derogatory Names

§ 1007. Process for Identifying Same or Similar Determined Offensive and Derogatory Names

- (a) Geographic Features or Place Names identified and approved as Offensive and Derogatory through the Petition process identified in Sections 1002 through 1006 above shall be considered for potential duplicity throughout the State.
- (b) The Committee shall solicit input from members of the public, California Native American tribes, and Public Agencies regarding other same or similar names located in California and under Public Agency jurisdiction for a period of 120 calendar days.
- (1) Submittals for same or similar Offensive and Derogatory Geographic Features or Place Names must come from a person or entity as consistent with Section 1002.
- (2) Submittals for same or similar Offensive and Derogatory Geographic Features or Place Names must also include the same information required in Section 1003(a)(1)-(4) and shall be submitted using the same means as those identified in Section 1004.
- (c) Upon receipt of a submittal for a same or similar Offensive and Derogatory Geographic Feature or Place Name, Committee staff shall send a notice of receipt.
- (d) After the 120 calendar day solicitation period has passed, Committee staff shall notify and coordinate with Responsible Public Agencies to identify and approve replacement names following the process as stated in Article 4.

Article 4. Process for Identifying and Approving Replacement Names

§ 1008. Identifying Replacement Names for Approved Offensive and Derogatory Geographic Features or Place Names

(a) Committee staff or Committee members shall conduct tribal consultations regarding all approved Petitions as consistent with the Agency’s Tribal Consultation Policy. Committee staff or Committee members shall notify and coordinate with Responsible Public Agencies as well as potentially affected state agencies to identify replacement names for approved Offensive and Derogatory Geographic Features or Place Names.

(1) Upon such notice, the Responsible Public Agency shall propose at least one replacement name to the Committee within 180 calendar days of receiving the Notice of Determination by the Committee.

- i. Replacement names shall adhere to the criteria identified in Section 1009.
- ii. The responsible Public Agency shall consult with potentially effected California Native American tribes to solicit replacement name proposals.
- iii. The responsible Public Agency shall provide guidance on pronunciation and meaning of proposed replacement names.

(2) If replacement names are not provided by the Public Agency within the 180 calendar days, or the replacement names are deemed to be Offensive and Derogatory by the Committee using the criteria listed in Section 1001 (g), the Committee shall solicit replacement names and input from the following:

- i. California Native American tribes,
- ii. Appropriate Public Agencies, and
- iii. Members of the public.

(b) The Committee shall review and approve or reject replacement names in accordance with the criteria stated in §1009.

(c) The Committee shall provide an opportunity for the public to provide comments during a public meeting for which replacement names for the Offensive and Derogatory Geographic Feature or Place Name are being considered.

- (d) After review and public comment, the Committee shall vote on a recommendation of proposed replacement names. The Committee or Committee staff shall subsequently transmit the results of the Committee vote, recommending one or more replacement names, to the Secretary of the Natural Resources Agency. The Secretary shall have 30 days to concur with the Committee or independently reject the recommended replacement names. If the Secretary takes no action after 30 days, the replacement name(s) shall be deemed accepted.
- (e) Upon the Committee's vote and Secretary's approval of a replacement name for an Offensive and Derogatory Geographic Feature or Place Name, the Committee or Committee staff shall notify the Responsible Public Agency.
- (f) The Responsible Public Agency shall formally adopt an approved replacement name within 365 days of Committee communication of the decision in Section 1008(f).
- (1) Extensions may be granted by the Committee upon request for reasonable cause. Reasonable cause may include, but is not limited to, natural disasters, established name change processes that require longer periods, or other causes outside a Responsible Public Agency's control.
- (g) Responsible Public Agencies shall coordinate with emergency response, mapping entities, and any additional departmental entities, as appropriate, to reflect the approved name changes in maps, signs, interpretive markers, and databases where the Geographic Feature or Place Name is recorded.
- (1) Additional information on coordinating with the entities mentioned in section 1008(h) is available on the California Natural Resources Agency's website.

Note: Authority cited: Section 8899.90 (b), Government Code. Reference: Sections Section 8899.94, Government Code.

§ 1009. Criteria for Approving a Replacement Name

- (a) When selecting replacement names, the Committee shall prioritize:
- (1) Names that do not refer to a specific person.
- (2) Names that honor and recognize California Native American tribes, tribal culture, and indigenous languages specific to the geographic region in question, including place names that were previously used by California Native American tribes.

(b) The Committee shall consider input received from California Native American tribes, Public Agencies, and affected members of the public.

(c) The replacement name shall not be Offensive or Derogatory as stated in Section 1001.

Note: Authority cited: Section 8899.94, Government Code. Reference: Sections Section 8899.94, Government Code.

§ 1010. Public Name Changes Independent of Petition Process

(a) Nothing in this Division is intended to prevent Public Agencies from independently adopting, modifying, or changing Geographic Features or Place Names under their jurisdiction that are consistent with existing law as well as the regulations in this Article.

Note: Authority cited: Section 8899.94, Government Code. Reference: Sections Section 8899.94, Government Code.

§ 1011. Committee Record, Findings, and Decision

(a) Once the Committee and Secretary have made a decision to reject or accept a Petition or replacement name, no further deliberations are needed by the Committee on the Geographic Features or Place Names in question.

(b) Final decisions on replacement names shall be recorded and made available to the public.

Note: Authority cited: Section 8899.95, Government Code. Reference: Sections Section 8899.95, Government Code.

§ 1012. Appeals to the Secretary

(a) Petitioners can appeal rejected Petitions and all recommended replacement names to the Secretary.

(b) The Committee has the discretion to determine if a rejected Petition should be reviewed again for completeness.

Note: Authority cited: Section 8899.94, Government Code. Reference: Sections Section 8899.94, Government Code.

Article 5. Public Comment

§ 1013. Right to Comment.

(a) Any persons or entities stated in Section 1002(a) may submit written or oral comments relevant to a proposed Petition or renaming proposal to the Agency.

Note: Authority cited: Section 8899.92, Government Code. Reference: Sections Section 8899.94 (2), Government Code.

Article 6. Remedies and Enforcement

§ 1014.

(a) Once a Public Geographic Feature or Place Name has been deemed Offensive and Derogatory by the Committee and approved by the Secretary of the Natural Resources Agency, a Public Agency shall no longer replace any sign, interpretative marker, or any other marker or printed material with the discontinued name.

(b) The Committee shall issue a notice of non-compliance for any failure by a Responsible Public Agency to replace a newly instated signs, markers, or other public insignia within 90 days of receiving a notice for non-compliance. The Committee shall seek any remedy and take any enforcement action available to it by law for any of the following, including, but not limited to:

- a. Failure of a Responsible Public Agency to comply with a final name-change decision falling under these regulations, or
- b. Maintenance of signs or other markers in contravention of a final name change decision or maintenance of signs or markers that otherwise retain an Offensive and Derogatory name in a space over which a Public Agency has direct jurisdiction or ownership.

Note: Authority cited: Section 1, and 8899.93, Government Code. Reference: Sections Section 8899.93 (a), Government Code.

From: [Kathy Lemos](#)
To: [FGG, Public Comment](#)
Subject: [External] Cannabis
Date: Saturday, April 11, 2026 4:57:18 PM

Please do not ruin bonsall with your cartel growers & attract all the garbage that follows pot farms!!! Grow it in rancho santa fe. Already ruined bonsall with all these approved homes so we are just going to be a parking lot.

Respectfully Yours,
Kathy Lemos

From: [Rachel White](#)
To: support@savekelseville.com
Subject: [External] Urgent: Local Government Action Needed on CACGN Naming Regulation
Date: Friday, April 10, 2026 10:05:26 AM
Attachments: [6March2026CACGNDraftRegs.pdf](#)

Please share this with your community members and local leadership.

Local Control Over State Mandates: Request for Opposition to CACGN Draft Renaming Regulations

I am writing to bring to your attention a set of draft regulations currently under consideration by the California Advisory Committee on Geographic Names (CACGN) titled the “Petition Process to Identify and Rename Offensive and Derogatory Geographic Features and Place Names.”

These proposed regulations would establish a statewide process that allows individuals or groups to petition to rename geographic features and populated places based on broadly defined, subjective criteria. While the intent of respectful naming is important, the current draft raises serious concerns that warrant your attention and, I respectfully request, formal opposition.

Key Concerns:

1. Erosion of Local Control

The proposed framework allows for state-level review and potential action even where local jurisdictions may not support a name change. Geographic names are deeply tied to local history, identity, and community consensus. Decisions of this magnitude should remain primarily within the authority of local governments and residents.

2. Vague and Subjective Standards

Terms such as “offensive” and “derogatory” are not clearly or objectively defined in the draft regulations. This creates a risk of inconsistent application, politicization, and uncertainty for counties and communities across California.

3. Low Threshold for Petition Initiation

The proposal appears to allow petitions to be initiated without demonstrating meaningful local support. This could subject counties to repeated or strategically motivated renaming efforts that do not reflect the will of the broader community.

4. Fiscal and Administrative Impacts

Renaming geographic features or communities can impose significant costs on counties, including updates to signage, records, maps, emergency services systems, and coordination with state and federal agencies. The draft does not adequately address these impacts or provide funding mechanisms.

5. Uncertain Scope and Precedent

Without clear limiting principles, the regulations could open the door to widespread challenges to existing place names, creating instability and ongoing administrative burden for counties statewide.

Request for Action:

Given these concerns, I respectfully request that you:

- Submit a formal comment to CACGN opposing the draft regulations in their current form; and
- Consider adopting a resolution affirming the importance of local control in geographic naming decisions and calling for substantial revisions to the proposal.

Public comments are currently being accepted, with a deadline of **June 5, 2026**, and may be submitted to: cacgn@resources.ca.gov

Please ensure receipt of your comments and inclusion in public records.

Local governments play a critical role in representing the interests of their residents. Your engagement on this issue would help ensure that any statewide policy respects local authority, provides clear standards, and fully considers the real-world impacts on communities.

Thank you for your time and consideration of this important matter.

Sincerely,

Rachel White
Kelseyville, California



CALIFORNIA NATURAL RESOURCES AGENCY
TITLE: PETITION PROCESS FOR
RENAMING OFFENSIVE AND
DEROGATORY PUBLIC
GEOGRAPHIC FEATURES OR PLACE NAMES
NAMES
DIVISION
CHAPTER

DRAFT TEXT OF PROPOSED REGULATIONS

Article 1. General Provisions

§ 1000. Applicability and Scope.

This chapter shall be known as the California Natural Resources Agency's (Agency) Petition Process for Renaming Offensive and Derogatory Public Geographic Features or Place Names. These regulations apply to all petitions made to the Agency's California Advisory Committee on Geographic Names (CACGN) for purposes of seeking review and possible public name change pursuant to Chapter 17 (commencing with § 8899.90) to Division 1 of Title 2 of the Government Code.

Note: Authority cited: Sections 8899.90, Government Code. Reference: Sections 8899.90, 8899.94 (a).

§ 1001. Definitions

The following definitions shall apply for the purposes of this Chapter:

(a) "California Advisory Committee on Geographic Names" or "CACGN" or "Advisory Committee" or "Committee" means the working group of state employees established within the California Natural Resources Agency through appointment by the Secretary of Natural Resources for purposes of providing advice and recommendation on public Geographic Features or Place Names located in California.

(b) "California Native American Tribe" means tribes located in California which are either recognized by the federal government pursuant to the annual list published under the Federally Recognized Indian Tribe List Act of 1994 (25 U.S.C. Sec. 5131) in the Federal Register or non-federally recognized.

- (c) “California Natural Resources Agency” means the cabinet level agency established pursuant to Government Code sections 12800 and 12805.
- (d) “Geographic Feature” means any location or publicly owned structure in California, including, but not limited to, navigable waters of the state, geographic features, parks, state or local roads, bridges, and publicly owned buildings.
- (e) “Notice of Determination” means a document stating the rejection or acceptance of a Petition for a Geographic Feature or Place Name.
- (f) “Notice of Receipt of Petition” means a document stating the Agency has received a Petition.
- (g) “Offensive and Derogatory” means:
- (1) Names with slurs or insults towards any classification of person identified in in Civil Code Section 51, or that perpetuate stereotypes or other pejorative ideology.
 - (2) Names that represent expressions of prejudice towards any class of person identified in Civil Code Section 51.
 - (3) Names honoring or with association or perceived association to specific people, past or present, who: Perpetuated or committed violence including but not limited to, rape, murder, genocide, forced relocation, internment, or human trafficking against any classification of person identified in in Civil Code Section 51.
- (h) “Petitioner” means a person or entity identified in Section 1002(a) who submits a Petition to rename an Offensive and Derogatory Geographic Feature or Place Name.
- (i) “Park” means any publicly owned or managed land primarily undeveloped and intended, at least in part, to preserve natural, scenic, or historic resources or to provide public recreational opportunities.
- (j) “Place” means any natural geographic feature or street, alley, or other road within the jurisdiction of the state or political subdivision of the state.
- (k) “Public Agency” means a California state agency, local governing body, and any other political subdivision of the State of California that has direct jurisdiction over or ownership of the Geographic Feature or Place Name.
- (l) “Secretary” means the Secretary of the Natural Resources Agency consistent with Public Resources Code sections 12800 and 12805.
- (m) “Supporting documentation” means sources in literature, web links, or news articles that

can be verified by third parties as to their accuracy or completeness.

Note: Authority cited: 8899.91, Government Code. Reference: Sections 8899.91, Government Code. Reference: Section 51, Civil Code, Section 12926(i),(s), Government Code.

Article 2. Petition Process

§ 1002. Geographic Features or Place Names Subject to Petition.

(a) The following persons or entities may Petition to identify an Offensive and Derogatory Geographic Feature or Place Name:

(1) California Native American tribes;

(2) Public Agencies;

(3) Natural persons who can establish residency in California at the time of filing a Petition, or natural persons who live outside of California at the time of filing a Petition, but who can demonstrate a personal or legal impact has occurred or will occur as the result of an Offensive or Derogatory name. A personal or legal impact that could result from an Offensive or Derogatory name include, but are not limited to, having or anticipating having a legal residence in a Place with an Offensive or Derogatory mailing address, owning a business or subsidiary with an Offensive or Derogatory mailing address, burying a relative in a District with an Offensive or Derogatory name, or having relatives who have lived in a Place with an Offensive or Derogatory Name;

(4) Legal entities, such as corporations, trusts, and other non-natural persons who have filed a tax return with the California State Franchise Tax Board in the year proceeding the Petition;

(5) Voting member of the Committee during their tenure on the Committee.

(b) Only public Geographic Features or Place Names within the jurisdiction of a Public Agency may be the subject of a Petition consistent with Government Code § 8899.94

(b)(2).

Note: Authority cited: Section 1(c), Government Code. Reference: Sections 8899.91 (b), Government Code.

§ 1003. Required Contents of a Petition.

(a) All Petitions to identify an Offensive and Derogatory Geographic Feature or Place Name shall include:

- (1) Name and contact information of the Petitioner.**
 - i. Contact information shall include an electronic mail address and phone number.**
 - ii. An electronic mail that is returned or an electronic mail address not functioning may delay the processing of the petition or may result in denial of the petition.**
- (2) The current name of the Geographic Feature or Place Name being proposed as Offensive and Derogatory.**
- (3) Location of the Geographic Feature or Place Name, including a map and the latitude and longitude that clearly identifies the location of the Geographic Feature or Place.**
- (4) A list of all Public Agencies with jurisdiction over the Geographic Feature or Place Name if known to Petitioner, or if unknown a statement identifying that Petitioner is not aware of the public entities with specific jurisdiction.**
- (5) Relevant history of the Geographic Feature or Place Name, including citations and supporting documentation of the relevant history. Relevant history may include history of the origin of the current name, meaning of the name, how long the name has been in use, and the historical significance of the name.**
- (6) Self-attestation under penalty of perjury that the Petitioner meets the requirements under Section 1002 (a).**
- (7) Justification why the Geographic Feature or Place Name is Offensive and Derogatory as defined in Section 1001.**
- (8) Engagement that has been done to date by the Petitioner with potentially affected Public Agencies, entities, tribes and members of the public.**

(9) Other narrative explanation from Petitioner about the basis of the Petition.

(b) All submitted documentation shall be legible.

Note: Authority cited: Sections 8899.90 (b), Government Code. Reference: Sections 8899.94 (a)(2), Government Code.

§ 1004. Submission of a Petition.

(a) Petitioners shall provide all information requested in Section 1003 for the Petition to be considered complete. Failure to provide the information may delay the processing of the Petition or may result in denial of the Petition.

(b) Petitions shall be submitted electronically to the Committee as indicated on the California Natural Resources Agency's website.

(c) A Notice of Receipt of the Petition will be sent to the Petitioner through the contact information provided in the Petition.

Note: Authority cited: Sections 8899.90 (b), Government Code. Reference: Sections 8899.94 (a)(2), Government Code.

§ 1005. Committee Staff Petition Evaluation.

(a) A Petition may be rejected on the following bases, including but not limited to:

(1) Illegible documentation.

(2) Required information as stated in Section 1003 has not been provided.

(3) Invalid email address or contact information.

(4) Petition requests the Committee change the names of private places or private geographic features, including but not limited to private roads, private businesses, or private signs not under any Public Agency jurisdiction.

(5) Petition requests the Committee change the names of Geographic Features or Place Names solely within the authority of the federal government.

(b) Committee staff will notify the Petitioner through electronic mail if a Petition is incomplete or if there are any deficiencies in the Petition or information provided.

(1) The Petitioner shall provide the requested corrections and additional information to Committee staff within 30 calendar days of the notification, or the Petition may be rejected.

- (c) Committee staff or Committee members shall conduct tribal consultations regarding all completed Petitions as consistent with the Agency's Tribal Consultation Policy.
- (d) Committee staff or Committee members shall consult with the responsible and affected Public Agencies on completed Petitions.
- (e) After completing consultations, Committee staff will send its recommendation and information on how to participate in the public CACGN meeting where the Committee will review the Petition to the Petitioner, potentially effected California Native American tribes, and the Responsible Public Agency.

Note: Authority cited: Sections 8899.90 (b), Government Code. Reference: Sections 8899.94 (a)(2), Government Code.

§ 1006. Committee Consideration of Petitions

- (a) Committee staff shall present a list of completed Petitions to the Committee during a public meeting.
- (b) The Committee shall consider the following criteria to determine approval or disapproval of a Petition:
 - (1) The Geographic Feature or Place Name meets the definition of Offensive and Derogatory as stated in Section 1001.
 - (2) Petition meets the standards for accepted Petitions as stated in Sections 1002, 1003 and 1004 of these regulations.
- (c) After hearing from Committee staff, the Petitioner, the Responsible Public Agencies, California Native American tribes, and the public, the Committee shall make a finding as to whether a reasonable person would find the Geographic Feature or Place Name Offensive and Derogatory. If a majority of the Committee finds that the Geographic Feature or Place Name is Offensive and Derogatory, it shall proceed to subpart (d) of this Section. If a majority of the Committee do not find that the Geographic Feature or Place Name is Offensive and Derogatory, the Committee shall reject the Petition.
- (d) The Committee or Committee staff shall subsequently transmit the results of the Committee vote, finding a Geographic Feature or Place Name to be Offensive and Derogatory, to the Secretary of the Natural Resources Agency. The Secretary shall have 30 days to concur with the

Committee or independently reject the Petition. If the Secretary takes no action after 30 days, the Petition shall be deemed accepted.

- (e) Upon the Committee’s vote and Secretary’s approval of a determination of a Geographic Feature or Place Name as Offensive and Derogatory, Committee staff shall send to the Petitioner and Responsible Public Agency a Notice of Determination.

Note: Authority cited: Section 8899.90, Government Code. Reference: Sections Section 8899.90, Government Code.

Article 3. Identification of Same or Similar Determined Offensive and Derogatory Names

§ 1007. Process for Identifying Same or Similar Determined Offensive and Derogatory Names

- (a) Geographic Features or Place Names identified and approved as Offensive and Derogatory through the Petition process identified in Sections 1002 through 1006 above shall be considered for potential duplicity throughout the State.
- (b) The Committee shall solicit input from members of the public, California Native American tribes, and Public Agencies regarding other same or similar names located in California and under Public Agency jurisdiction for a period of 120 calendar days.
- (1) Submittals for same or similar Offensive and Derogatory Geographic Features or Place Names must come from a person or entity as consistent with Section 1002.
- (2) Submittals for same or similar Offensive and Derogatory Geographic Features or Place Names must also include the same information required in Section 1003(a)(1)-(4) and shall be submitted using the same means as those identified in Section 1004.
- (c) Upon receipt of a submittal for a same or similar Offensive and Derogatory Geographic Feature or Place Name, Committee staff shall send a notice of receipt.
- (d) After the 120 calendar day solicitation period has passed, Committee staff shall notify and coordinate with Responsible Public Agencies to identify and approve replacement names following the process as stated in Article 4.

Article 4. Process for Identifying and Approving Replacement Names

§ 1008. Identifying Replacement Names for Approved Offensive and Derogatory Geographic Features or Place Names

(a) Committee staff or Committee members shall conduct tribal consultations regarding all approved Petitions as consistent with the Agency’s Tribal Consultation Policy. Committee staff or Committee members shall notify and coordinate with Responsible Public Agencies as well as potentially affected state agencies to identify replacement names for approved Offensive and Derogatory Geographic Features or Place Names.

(1) Upon such notice, the Responsible Public Agency shall propose at least one replacement name to the Committee within 180 calendar days of receiving the Notice of Determination by the Committee.

- i. Replacement names shall adhere to the criteria identified in Section 1009.
- ii. The responsible Public Agency shall consult with potentially effected California Native American tribes to solicit replacement name proposals.
- iii. The responsible Public Agency shall provide guidance on pronunciation and meaning of proposed replacement names.

(2) If replacement names are not provided by the Public Agency within the 180 calendar days, or the replacement names are deemed to be Offensive and Derogatory by the Committee using the criteria listed in Section 1001 (g), the Committee shall solicit replacement names and input from the following:

- i. California Native American tribes,
- ii. Appropriate Public Agencies, and
- iii. Members of the public.

(b) The Committee shall review and approve or reject replacement names in accordance with the criteria stated in §1009.

(c) The Committee shall provide an opportunity for the public to provide comments during a public meeting for which replacement names for the Offensive and Derogatory Geographic Feature or Place Name are being considered.

- (d) After review and public comment, the Committee shall vote on a recommendation of proposed replacement names. The Committee or Committee staff shall subsequently transmit the results of the Committee vote, recommending one or more replacement names, to the Secretary of the Natural Resources Agency. The Secretary shall have 30 days to concur with the Committee or independently reject the recommended replacement names. If the Secretary takes no action after 30 days, the replacement name(s) shall be deemed accepted.
- (e) Upon the Committee's vote and Secretary's approval of a replacement name for an Offensive and Derogatory Geographic Feature or Place Name, the Committee or Committee staff shall notify the Responsible Public Agency.
- (f) The Responsible Public Agency shall formally adopt an approved replacement name within 365 days of Committee communication of the decision in Section 1008(f).
- (1) Extensions may be granted by the Committee upon request for reasonable cause. Reasonable cause may include, but is not limited to, natural disasters, established name change processes that require longer periods, or other causes outside a Responsible Public Agency's control.
- (g) Responsible Public Agencies shall coordinate with emergency response, mapping entities, and any additional departmental entities, as appropriate, to reflect the approved name changes in maps, signs, interpretive markers, and databases where the Geographic Feature or Place Name is recorded.
- (1) Additional information on coordinating with the entities mentioned in section 1008(h) is available on the California Natural Resources Agency's website.

Note: Authority cited: Section 8899.90 (b), Government Code. Reference: Sections Section 8899.94, Government Code.

§ 1009. Criteria for Approving a Replacement Name

- (a) When selecting replacement names, the Committee shall prioritize:
- (1) Names that do not refer to a specific person.
- (2) Names that honor and recognize California Native American tribes, tribal culture, and indigenous languages specific to the geographic region in question, including place names that were previously used by California Native American tribes.

(b) The Committee shall consider input received from California Native American tribes, Public Agencies, and affected members of the public.

(c) The replacement name shall not be Offensive or Derogatory as stated in Section 1001.

Note: Authority cited: Section 8899.94, Government Code. Reference: Sections Section 8899.94, Government Code.

§ 1010. Public Name Changes Independent of Petition Process

(a) Nothing in this Division is intended to prevent Public Agencies from independently adopting, modifying, or changing Geographic Features or Place Names under their jurisdiction that are consistent with existing law as well as the regulations in this Article.

Note: Authority cited: Section 8899.94, Government Code. Reference: Sections Section 8899.94, Government Code.

§ 1011. Committee Record, Findings, and Decision

(a) Once the Committee and Secretary have made a decision to reject or accept a Petition or replacement name, no further deliberations are needed by the Committee on the Geographic Features or Place Names in question.

(b) Final decisions on replacement names shall be recorded and made available to the public.

Note: Authority cited: Section 8899.95, Government Code. Reference: Sections Section 8899.95, Government Code.

§ 1012. Appeals to the Secretary

(a) Petitioners can appeal rejected Petitions and all recommended replacement names to the Secretary.

(b) The Committee has the discretion to determine if a rejected Petition should be reviewed again for completeness.

Note: Authority cited: Section 8899.94, Government Code. Reference: Sections Section 8899.94, Government Code.

Article 5. Public Comment

§ 1013. Right to Comment.

(a) Any persons or entities stated in Section 1002(a) may submit written or oral comments relevant to a proposed Petition or renaming proposal to the Agency.

Note: Authority cited: Section 8899.92, Government Code. Reference: Sections Section 8899.94 (2), Government Code.

Article 6. Remedies and Enforcement

§ 1014.

(a) Once a Public Geographic Feature or Place Name has been deemed Offensive and Derogatory by the Committee and approved by the Secretary of the Natural Resources Agency, a Public Agency shall no longer replace any sign, interpretative marker, or any other marker or printed material with the discontinued name.

(b) The Committee shall issue a notice of non-compliance for any failure by a Responsible Public Agency to replace a newly instated signs, markers, or other public insignia within 90 days of receiving a notice for non-compliance. The Committee shall seek any remedy and take any enforcement action available to it by law for any of the following, including, but not limited to:

- a. Failure of a Responsible Public Agency to comply with a final name-change decision falling under these regulations, or
- b. Maintenance of signs or other markers in contravention of a final name change decision or maintenance of signs or markers that otherwise retain an Offensive and Derogatory name in a space over which a Public Agency has direct jurisdiction or ownership.

Note: Authority cited: Section 1, and 8899.93, Government Code. Reference: Sections Section 8899.93 (a), Government Code.

From: [Lu Rehling](#)
To: [HHSA, BHSEngage](#)
Cc: [MontgomerySteppe, Monica](#); [Lawson-Remer, Terra](#); [Desmond, Jim](#); [Anderson, Joel](#); [BOS, District1Community](#); [FGG, Public Comment](#)
Subject: [External] Project ID # 1023736 at 4307 3rd Ave
Date: Tuesday, April 14, 2026 1:41:53 PM

Hello. I am writing in opposition to the 148-bed behavioral health facility that the county Behavioral Health Department is proposing to locate at 3rd Ave in District 4/Uptown San Diego (Project ID # 1023736). I am copying all members of the board (including my D4 representative), to ensure that they are aware that this is a controversial proposal and one that is likely to face significant community opposition.

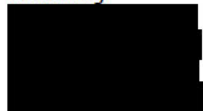
My opposition is based primarily on safety factors in this cul-de-sac location on a very narrow street, including impacts on traffic, especially involving access for emergency vehicles. This location is in an already densely populated neighborhood, which adjoins the UCSD and Scripps medical centers, and nearby large multi-unit residential developments are already in the pipeline or under construction. This new facility would further increase both the number and size of vehicles in the area, with traffic at more times of day and night. That additional traffic would further the frequency of clogged neighborhood roadways, most of which already are at or near capacity. Increased demands for parking would further reduce street capacity for maneuvering.

Another safety concern is that the proposed new facility would be across the street from an open space trailhead. That area already is impacted by homeless encampments and related challenging encounters for local hikers and joggers. Some patients released from the proposed behavioral health facility might not have secure housing, which could add to the open space trail problems.

By reducing safety, access, and both residential and visitor parking, this proposed use of county land would decrease the quality of life for community members. The location in question once contained sports fields that have been in disuse for years and are now overgrown. The county should be considering this as a prime location for a low-cost public park, not using or selling it for purposes of development that would harm livability for current and future residents.

Thank you for considering my views and I hope that you will represent them when this project comes before the board for approval. -- Louise Rehling

Lu Rehling



From: [Vanessa](#)
To: [Anderson, Joel](#); [FGG, Public Comment](#); [Desmond, Jim](#); [Lawson-Remer, Terra](#)
Subject: [External]
Date: Tuesday, April 14, 2026 9:57:05 AM

Hello my name is Vanessa Harper. I am reaching out to get in touch with Supervisor Joel Anderson.

I am writing to formally oppose the use of local and state tax dollars to fund legal defense services for non-citizens, including the Immigrant Legal Defense Program (ILDLP). Given San Diego County's current [structural deficit](#)—which is projected to require millions in additional funding to maintain these programs—I believe our limited resources must be prioritized for essential services that benefit the general public, such as infrastructure, public safety, homelessness, VETERAN HOUSING, foster care. Furthermore, I oppose any California state funding being directed toward keeping migrants in the state through subsidized legal representation or support services. Immigration enforcement and the associated legal costs are federal responsibilities, and it is fiscally irresponsible to divert local tax revenue to address these federal mandates while our own community is underfunded.

From: [john armstrong](#)
To: [FGG, Public Comment](#)
Subject: [External] Share water?
Date: Monday, April 20, 2026 5:21:51 PM

So are you guys going to share your water surplus with the upper CO River basin states? San Diego is a very aggressive urban conglomerate . . .

- grows like crazy,
- have to drive 90 MPH on its urban freeways to join the commute club,
- sucks a lotta water from Salton Sea / Imperial Valley - I love that when you're getting it from farmers and cow farmers, as in forced fallowing!! Consider IID and ADA (amer dairy assn) the enemies - because beef and alfalfa are the number 1 output of SSIV, most of it going to enemy countries abroad for the last half a century. Sick.

John Armstrong
Rocklin, CA. Albuquerque native



From: [henking \[REDACTED\]](#)
To: [Lawson-Remer, Terra](#); [BOS, District1Community](#); [Supervisor Joel Anderson District 2](#); [MontgomerySteppe, Monica](#); [Desmond, Jim](#)
Cc: [FGG, Public Comment](#)
Subject: [External] Fw: A War to END Street Homelessness in America?
Date: Tuesday, April 21, 2026 8:07:10 PM

FYI - Let's do it!

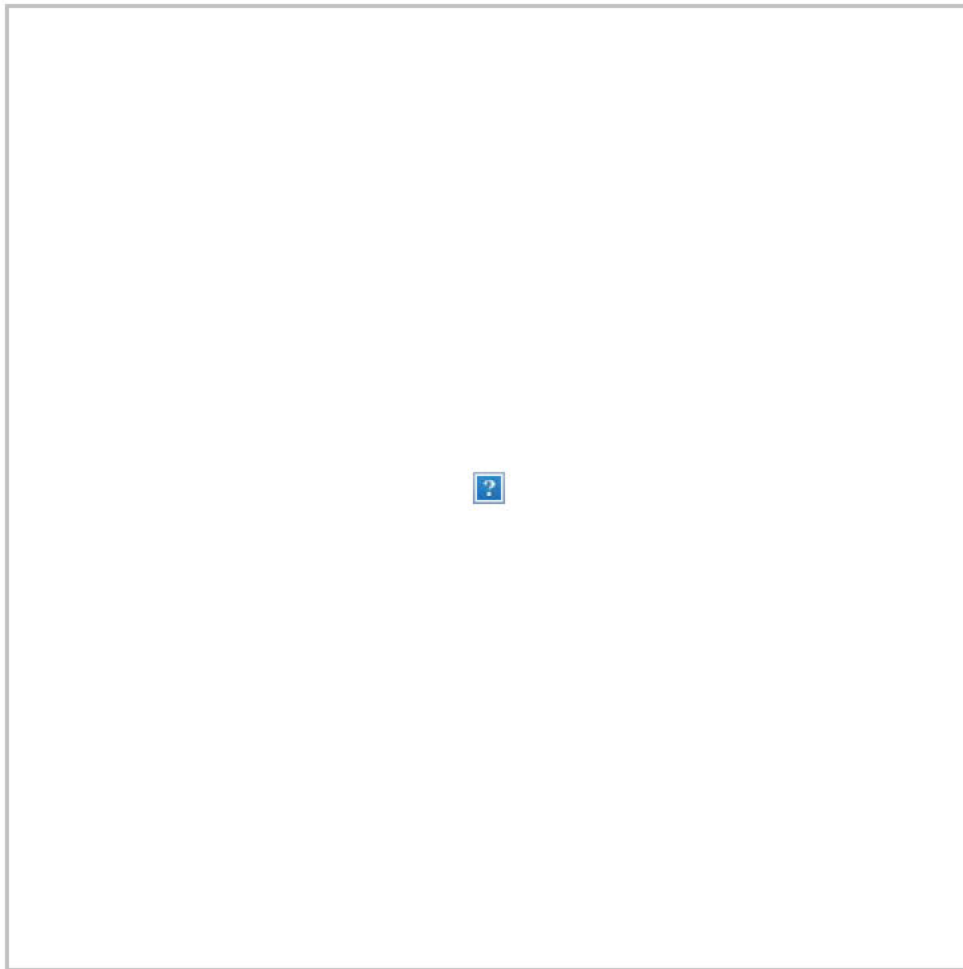
-----Forwarded Message-----

From: Sunbreak Ranch News <news@sunbreakranch.com>
Sent: Apr 21, 2026 10:00 AM
To: PAUL [REDACTED]
Subject: A War to END Street Homelessness in America?

[View this email in your browser](#)



**[A War to END Street Homelessness
in America?](#)**



Is it time to declare a **WAR TO END STREET HOMELESSNESS IN AMERICA?**

MEANING a "non-violent" domestic nationwide effort geared to save hundreds of thousands of lives of our fellow citizens. Who wouldn't want to do this?

[Sunbreak Ranch](#) is perhaps the only true national effort focused on ENDING STREET HOMELESSNESS in America. And it is a 100% NON-PARTISAN endeavor.

Along with world-renowned surgeon **Dr. Ben Carson**, Academy-Award winning actor **Jon Voight**, Hollywood Filmmaker **Steven Paul**, NBA legend **Bill Walton** (RIP), Rotary International General Secretary **John Hewko**, California Gubernatorial candidate **Steve Hilton**, Alpha Project CEO **Bob McElroy**, former U.S. Attorney for the Southern District of California **Robert Brewer** and hundreds of others, the [Sunbreak Ranch Endorsement Team](#) continues to grow.

We challenge you to find a more qualified [Management Team](#) (anywhere in America) to lead America out of our current homelessness quagmire. Look at the leadership qualifications and experience with this team — the decades of service-to-nation and service-to-community — the extensive commitment and effort to helping the homeless — as well as the significant law enforcement and judicial experience.



Sunbreak is a model that can be quickly replicated in every city with need. The successful implementation of Sunbreak will ultimately save hundreds of thousands of lives across America, alleviate widespread suffering, unlock unfathomable human potential, and clean up America's cities for all of us.

Victory over street homelessness is absolutely achievable. Ignore the naysayers, the financially-conflicted and the fraudsters who claim otherwise. If you doubt this is achievable, please travel to Japan, South Korea, China, Germany, Italy, or almost anywhere else in the world — you won't see anything comparable to America's inhumane and embarrassing street homeless encampments.

Do we want to continue with the empty talk and empty promises about ending homelessness? Or do we finally want to end street homelessness and end the widespread pain, suffering and death? It's time to make a choice, America.

Declaring an all-hands-on-deck **WAR TO END STREET HOMELESSNESS IN AMERICA** is long overdue.

God-speed to ending the misery and death on America's streets.

SUNBREAK RANCH



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From: [henkin](#) [REDACTED]
To: [Lawson-Remer, Terra](#); [BOS, District1Community](#); [MontgomerySteppe, Monica](#); [Supervisor Joel Anderson District 2](#); [Desmond, Jim](#)
Cc: [FGG, Public Comment](#)
Subject: [External] HEARING ISSUES?
Date: Wednesday, April 22, 2026 11:50:28 AM

Good Morning, Terra,

A few meetings ago, you interrupted my speaking on licensing autonomous taxis, calling it off topic, when the topic was licensing taxis.

Today, you called me out for speaking off topic when I clearly mentioned (several times) both the item number and the topic.

Are you hearing me loud and clear? Or is it something else?

Ear cleaning can do wonders for hearing, if that is what is needed.

Regards,

Paul Henkin

From: [Joseph Razor SR](#)
To: [FGG, Public Comment](#); Harringtonheights@royalpropertymgmt.com; info@sdhc.org
Cc: [J Razor](#)
Subject: [External] Public Comment – Ongoing Residential Safety Concern & Request for Review (San Diego)
Date: Wednesday, April 22, 2026 9:33:02 AM
Attachments: [attachment-1.png](#)

Hello,

My name is Joseph J. Razor Sr., and I am submitting this public comment for immediate awareness regarding an ongoing residential safety concern in San Diego.

LOCATION:

[REDACTED]
San Diego, California

SUMMARY:

Since January 6, 2026, I have experienced and documented ongoing and repeated safety concerns occurring on a daily basis within my residence.

These incidents have been reported through multiple channels; however, the matter remains unresolved.

KEY CONCERNS:

- repeated unauthorized access concerns not involving the primary entry point
- potential construction-related vulnerabilities
- lack of confirmed inspection or structural review
- continued daily occurrences without resolution

ACTIONS TAKEN:

This matter has been:

- reported to the San Diego Police Department (Event No. 26030005075)
- submitted to the District Attorney's Office (Reference ID: CC2026-171)
- reported to property management
- escalated through city housing, code enforcement, and inspection channels
- followed by a formal request for building records and plan review
- escalated through state and federal outreach

REQUEST:

I respectfully request:

- review and awareness of this matter at the appropriate level
- consideration for inspection or coordinated review
- guidance on additional steps to ensure proper evaluation

PURPOSE:

The purpose of this comment is to ensure that ongoing safety concerns are properly documented and reviewed through appropriate oversight channels.

Thank you for your time and consideration.

Respectfully,

Joseph J. Razor Sr.
San Diego Resident
[REDACTED]

Joseph Razor

VS1 Collections

[REDACTED]



[REDACTED]

[REDACTED]

From: [Joseph Razor SR](#)
To: cityclerk@sandiego.gov; [FGG, Public Comment](#)
Cc: [J Razor](#)
Subject: [External] Public Safety Infrastructure Innovation – The Glow Project
Date: Wednesday, April 22, 2026 11:02:11 AM
Attachments: [attachment-1.png](#)

PUBLIC COMMENT SUBMISSION
San Diego County Board of Supervisors Meeting

Dear Chair and Honorable Supervisors,

My name is Joseph J. Razor Sr., Candidate for Mayor of San Diego, Founder of VS1COLLECTIONS, and a resident of San Diego County. I respectfully submit this written public comment to bring attention to a public safety and infrastructure opportunity for our region.

Across San Diego County and beyond, our bridges, roadways, and public infrastructure systems face ongoing visibility challenges—particularly during nighttime conditions, coastal fog, power outages, and emergency situations. While current maintenance efforts focus on structural protection, there remains an opportunity to enhance safety through improved visibility.

I am introducing The Glow Project, a photoluminescent infrastructure safety system designed to absorb ambient light during the day and emit illumination at night without requiring electricity. This system is intended to function as an overlay that can integrate into existing maintenance cycles, such as bridge repainting operations.

For example, the San Diego-Coronado Bridge requires continuous maintenance, with approximately 1.5 million square feet of surface area and a repainting cycle spanning nearly ten years. This ongoing work presents a strategic opportunity to evaluate innovative safety enhancements without disrupting existing operations.

This initiative is being developed as a Public-Private Partnership (PPP), with initial outreach already made to relevant city, state, and federal agencies. It is also supported by community outreach partners, including Rainbow Global Faith Center, focused on public awareness and community engagement.

San Diego County has the opportunity to lead at the local, state, national, and global level by exploring forward-thinking safety solutions that align with infrastructure resilience and emergency preparedness.

I respectfully request consideration for: • Agency coordination and review

- Identification of potential pilot locations within the County
- Discussion of public-private partnership opportunities related to infrastructure safety innovation

Thank you for your time, leadership, and commitment to public safety.

Respectfully submitted,

Joseph J. Razor Sr.
Candidate for Mayor of San Diego
Founder, VS1COLLECTIONS



Joseph Razor

VS1 Collections



From: [Larissa Anderson](#)
To: [LUEG, PDS.PlanningCommission](#)
Cc: PDS@sdcounty.ca.gov; [Potter, Andrew](#); [FGG, Public Comment](#)
Subject: [External] Public Comment Submission – SECP (April 10, 2026)
Date: Wednesday, April 22, 2026 4:09:24 PM

Dear Planning Commission Staff and Clerk of the Board,

Please include my public comment submitted at the April 10, 2026 Planning Commission hearing regarding the Socially Equitable Cannabis Program in the official administrative record for this item.

Written version of April 10 Planning Commission comment:

https://docs.google.com/document/d/e/2PACX-1vSAp31oWvU-7TQz2fRsIJSMxwKnuN4VcN8CXmBNCaCDp6DINIIdHqQkC4u_30nkKF_qf2iT8ekAQgvec/pub

The primary focus of this comment relates to land-use impacts, school siting constraints, and the need for consistent and legally defensible application of CEQA standards—particularly as they relate to cumulative impacts and infrastructure capacity in rural communities.

This submission is intended to supplement my public comment from the January 14, 2026 Board of Supervisors hearing and to ensure continuity of the administrative record across proceedings.

In light of Earth Day, this submission also underscores the importance of applying environmental standards consistently and transparently across land uses.

Together, these submissions reflect concerns and questions previously raised through formal Board action, prior written correspondence from Bonsall Unified School District and the Bonsall Community Sponsor Group, and public testimony, and do not represent new or additional Board direction.

Thank you for confirming receipt.

Respectfully,
Larissa Anderson
President, Bonsall Unified School District
Chair, Bonsall Community Sponsor Group

From: [Kathleen Hayden](#)
To: [FGG, Public Comment](#); [Neal, Stephanie](#); meghan.hertel@resources.ca.gov
Subject: [External] REQUEST FOR FORMAL HERITAGE RESOURCE DESIGNATION
Date: Friday, April 24, 2026 9:42:56 AM

To: The San Diego County Board of Supervisors

CC: Meghan Hertel (Director, CDFW); Stephanie Neal (MSCP Project Manager)

Date: April 23, 2026

Subject: Designation of the Coyote Canyon Heritage Herd as a Native Cultural Resource within the North County MSCP

I. Statement of Intent

The Coyote Canyon Caballos d'Anza non-profit formally requests that the San Diego County Board of Supervisors recognize the Coyote Canyon Heritage Herd as a Significant Native Cultural Resource. This designation is supported by peer-reviewed research, archaeological findings at the Village of Pamo, and definitive Texas A&M DNA analysis (see attached Infographic).

II. Genetic & Historical Foundations

The attached Genetic Pedigree & Historical Lineage Chart proves that this herd is a living genetic archive of the 1769 Portolá expedition. Key findings include:

- Ancestral "Outliers": The presence of Turkoman and primitive Iberian (Garrano) markers identifies these horses as the foundational stock of the world's elite warmblood lines (Holsteiner/Hanoverian), preserved in isolation in San Diego for over 250 years.
- The Spanish Trail Diaspora: Genetic links to the Sulphur Springs (UT) cluster provide biological proof of the 19th-century "Spanish Trail" raids. This represents a unique opportunity for San Diego to repatriate its "expatriate" genetics as part of a world-class restoration project.

III. Integration with North County MSCP (Summer 2026)

With the release of the North County MSCP Public Draft EIR/EIS this summer, the County must address the "Living Cultural Resource" gap. Under CEQA and Section 106, the failure to include a documented 250-year-old heritage species in the Ramona Grasslands (Pamo Village) resource management plan constitutes a fatal flaw in the environmental review process.

IV. Administrative Resolution of Federal Liability

The Bureau of Land Management (BLM) currently carries an estimated \$800,000+ maintenance liability for these "untitled" federal assets. By designating a permanent habitat within the MSCP, the County provides a venue for an Administrative Settlement between the Founders (Kathleen & Robert Hayden) and the Federal Government, resolving two decades of unpaid care while securing a permanent public asset for San Diego.

V. Requested Actions

1. Formal Recognition: Designate the Coyote Canyon Heritage Herd as a "Protected Feature" within the MSCP.
2. Genetic Homecoming: Authorize the managed introduction of Sulphur Springs "DNA Cousins" to ensure the long-term vitality of the San Diego lineage.
3. Consulting Status: Grant the Founders (Kathleen & Robert Hayden) permanent consulting party status for all management actions within the Ramona Grasslands Heritage Zone.

Respectfully submitted,

Kathleen Hayden & Robert Hayden Founders, Coyote Canyon Caballos d'Anza

P.S Vision

To establish a permanent, managed sanctuary for the Coyote Canyon Heritage Herd and its genetic kin within the San Diego North County MSCP. This project reunites the original 1769 Spanish horse lineage of the Portolá Expedition, restoring a vital cultural resource to the Ramona Grasslands (Village of Pamo).

I. Historical & Scientific Foundation

- The Portolá Legacy (1769): The foundation of California's equine history began in San Diego. Genetic markers confirm that the Coyote Canyon (CA) and Sulphur Springs (UT) herds share a common primitive Iberian ancestry emanating from this expedition.
- The Great Diaspora: 19th-century history documents extensive raids by Chief Walkara and Pegleg Smith, who drove thousands of Spanish horses from the San Diego missions and ranchos along the Old Spanish Trail into Utah. The Sulphur Springs herd represents a "time capsule" of this original San Diego stock.
- Evolutionarily Significant Units (ESU): Current DNA similarities between these two populations support their classification as a single, distinct heritage group. Bringing Sulphur DNA back to San Diego is a "Genetic Homecoming" that ensures the survival of the breed.

II. Site Specificity: The Village of Pamo

- Landscape-Scale Preservation: As documented by Dr. Susan Hector, the Ramona Grasslands represent an intact settlement complex (Village of Pamo).
- Cultural Symbiosis: The Kumeyaay people utilized these grasslands for millennia. Restoring the horses—documented on these lands by Albert Lacson—re-establishes the cultural integrity of this "Traditional Cultural Property" (TCP) under Section 106.

III. Strategic Solutions for 2026

- Federal Liability Mitigation: The BLM currently faces a significant maintenance debt for "untitled" heritage horses. This project offers a "Settlement by Performance" where the BLM's financial liability is resolved through the designation of a permanent habitat.
- The Conduit Partnership: Utilizing specialized expertise, the program will facilitate a program to restore DNA the introduction of Sulphur Springs "cousins" to build a self-sustaining, genetically diverse population.

· MSCP Integration: This initiative transforms a "passive" conservation area into an active Cultural Heritage Zone, meeting the County's goals for biodiversity, historic preservation, and public education.

From: [REDACTED]
To: Director@wildlife.ca.gov
Cc: AskR5@wildlife.ca.gov; [Neal, Stephanie](#); [FGG, Public Comment](#)
Subject: [External] Congratulations and Request for Formal Heritage Resource Designation: Coyote Canyon Heritage Herd
Date: Friday, April 24, 2026 12:32:20 PM

Dear Director Hertel,

Congratulations on your appointment as Director of the California Department of Fish and Wildlife. We are reaching out regarding a critical heritage resource matter that falls directly under your department's mission to steward California's diverse wildlife and habitats.

On behalf of the Coyote Canyon Caballos d'Anza non-profit, we are formally requesting that the Department recognize the Coyote Canyon Heritage Herd as a Significant Native Cultural Resource within the North County Multiple Species Conservation Program (MSCP).

Our request is supported by several key findings:

- Genetic and Historical Evidence: DNA analysis by Texas A&M has identified rare Turkoman and primitive Iberian markers, linking the herd to the 1769 Portolá expedition.
- Cultural Significance: Archaeological research at the Village of Pamo and Kumeyaay history further establishes the herd's role as a vital cultural resource in the Ramona Grasslands.
- Legal Framework: Following the Loper Bright Enterprises v. Raimondo (2024) decision, agencies must adhere to the "single best meaning" of environmental and heritage laws. Under CEQA and Section 106, failing to include this heritage species in the resource management plan constitutes a flaw in the environmental review process.

We specifically request that the Department:

1. Formally designate the Coyote Canyon Heritage Herd as a "Protected Feature" within the MSCP.
2. Coordinate with San Diego County to ensure the herd is included as a covered resource in the ongoing North County MSCP modifications.
3. Recognize the herd's status under CEQA Section 15380 as a rare/significant resource regardless of formal ESA listing.

We believe this project offers a unique opportunity to resolve long-standing maintenance liabilities while securing a permanent public asset for California.

Respectfully submitted,

Kathleen Hayden & Robert Hayden
Founders, Coyote Canyon Caballos d'Anza

From: [REDACTED]
To: Director@wildlife.ca.gov
Cc: AskRegion5@wildlife.ca.gov; [Neal, Stephanie](#); [FGG, Public Comment](#)
Subject: [External] Congratulations and Request for Formal Heritage Resource Designation: Coyote Canyon Heritage Herd
Date: Friday, April 24, 2026 12:29:49 PM

Dear Director Hertel,

Congratulations on your appointment as Director of the California Department of Fish and Wildlife. We are reaching out regarding a critical heritage resource matter that falls directly under your department's mission to steward California's diverse wildlife and habitats.

On behalf of the Coyote Canyon Caballos d'Anza non-profit, we are formally requesting that the Department recognize the Coyote Canyon Heritage Herd as a Significant Native Cultural Resource within the North County Multiple Species Conservation Program (MSCP).

Our request is supported by several key findings:

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Respectfully submitted,

Kathleen Hayden & Robert Hayden
Founders, Coyote Canyon Caballos d'Anza

From: [REDACTED]
To: [FGG, Public Comment](#)
Cc: Meghan.Hertel@resources.ca.gov; [Neal, Stephanie](#)
Subject: [External] Request for Formal Heritage Resource Designation: Coyote Canyon Heritage Herd
Date: Friday, April 24, 2026 12:26:10 PM

Dear San Diego County Board of Supervisors,

On behalf of the Coyote Canyon Caballos d'Anza non-profit, we are formally requesting that the Board recognize the Coyote Canyon Heritage Herd as a Significant Native Cultural Resource within the North County Multiple Species Conservation Program (MSCP).

Our request is supported by several key findings:

- Genetic and Historical Evidence: DNA analysis by Texas A&M has identified rare Turkoman and primitive Iberian markers, linking the herd to the 1769 Portolá expedition.
- Cultural Significance: Archaeological research at the Village of Pamo and Kumeyaay history further establishes the herd's role as a vital cultural resource in the Ramona Grasslands.
- Legal Framework: Under CEQA and Section 106, failing to include this heritage species in the resource management plan constitutes a flaw in the environmental review process.

We specifically request that the Board:

1. Formally designate the Coyote Canyon Heritage Herd as a "Protected Feature" within the MSCP.
2. Authorize the managed introduction of Sulphur Springs "DNA Cousins" to ensure the lineage's vitality.
3. Grant Kathleen and Robert Hayden permanent consulting party status for management actions within the Ramona Grasslands Heritage Zone.

We believe this project offers a unique opportunity to resolve long-standing federal maintenance liabilities while securing a permanent public asset for San Diego.

Respectfully submitted,

Kathleen Hayden & Robert Hayden
Founders, Coyote Canyon Caballos d'Anza

From: [REDACTED]
To: [FGG, Public Comment](#); [Oakes, Chelsea](#); Stephanie.Ewalth@sdcounty.ca.gov
Subject: [External] Follow-up: Contesting Exclusion of Coyote Canyon Heritage Herd from MSCP
Date: Saturday, April 25, 2026 7:27:16 PM

Dear Supervisors and Board Members,

We are following up on our formal request to include the Coyote Canyon Heritage Herd in the North County Multiple Species Conservation Program (MSCP).

We specifically wish to address the position stated by the Sustainability Planning Division (Chelsea Oakes, August 2025) regarding the exclusion of the herd based on its lack of formal listing under the Endangered Species Act. As noted in our previous correspondence:

1. CEQA Section 15380 Mandate: An animal may be treated as rare or endangered even if not officially listed when its survival is in jeopardy. The loss of habitat and the critical nature of this heritage lineage meet this criteria.
2. Native Cultural Resource Status: The herd is a documented part of the Kumeyaay cultural landscape and the Village of Pamo. Historic and cultural resources must be inventoried under the National Historic Preservation Act (NHPA) and the California Public Resources Code.
3. Legal Precedent: The 2024 Nevada ruling (Judge Du) establishes that land managers are compelled to prepare Herd Management Area Plans (HMAP) and that decades-long delays in environmental reviews are egregious.

The County's current RMP for the Ramona Grasslands is fatally flawed due to these omissions. We request that the Board direct the Sustainability Planning Division to reconsider the herd's inclusion as a Covered Species or a Protected Feature in the 2026 MSCP Draft.

Respectfully,

Kathleen Hayden
Acting Manager, Coyote Canyon Caballos d'Anza