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**From:** Shelby S <sheehan.shelby@gmail.com>  
**Sent:** Thursday, November 7, 2024 3:33 PM  
**To:** City Clerk <CLERK@alamedaca.gov>; Historical Board <historicalboard@alamedaca.gov>  
**Subject:** [EXTERNAL] Public comment--nonagenda HAB meeting tonight

Clerk-  
Please post this comment to the HAB meeting tonight (revised)--my other one was sent too soon. Thanks

**CEQA Section 15384**

The specific CEQA code that refers to the need for expert opinion is found in the CEQA Guidelines, which are part of the California Code of Regulations (CCR). Specifically, **CEQA Guidelines Section 15384** (14 CCR § 15384) defines **substantial evidence**:

**California Code of Regulations, Title 14, Section 15384 - Substantial Evidence:**

- **Substantial evidence** means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached.
- **Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.**
- **Substantial evidence does not include** arguments, speculation, unsubstantiated opinion or narrative, or evidence which is clearly erroneous or inaccurate.

This section indicates that expert opinion supported by factual evidence is an important part of establishing substantial evidence under CEQA. This means that when an agency evaluates a potential environmental impact, including impacts to historical resources, having an expert's professional opinion is often necessary to meet the substantial evidence standard required for decision-making.

The use of "expert opinion" highlights that, especially for specialized fields like historical resource evaluation, relying on qualified experts is crucial to provide defensible, substantial evidence in the CEQA process.

**ALAMEDA POINT EIR**

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