



Tips for Reviewing the Sonoma Developmental Center Specific Plan and Environmental Document

PREPARED FOR THE SONOMA LAND TRUST
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OBJECTIVES OF CEQA

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Disclosure

- Inform the public and decision makers about environmental consequences

Environmental Protection

- Identify impacts and prevent/avoid/minimize adverse effects

Foster Public Participation

- And interagency reviews and participation



Environmental Impact Report (EIR)

Informational document to inform public of environmental impacts, ways to minimize impacts, and alternatives that would reduce project impacts.

- Thorough evaluation of the project's reasonably foreseeable impacts
- EIR conclusions must be based on substantial evidence
- Includes mitigations and alternatives that reduce Project's significant impacts



How to Review the Draft EIR (DEIR)

Tips: Review the DEIR

- Start with the Specific Plan to understand the proposal
- Study the Project Description
- Review the Summary for an overview of the EIR
- Look at the analysis for the topics that interest/concern you most
- Skim the alternatives



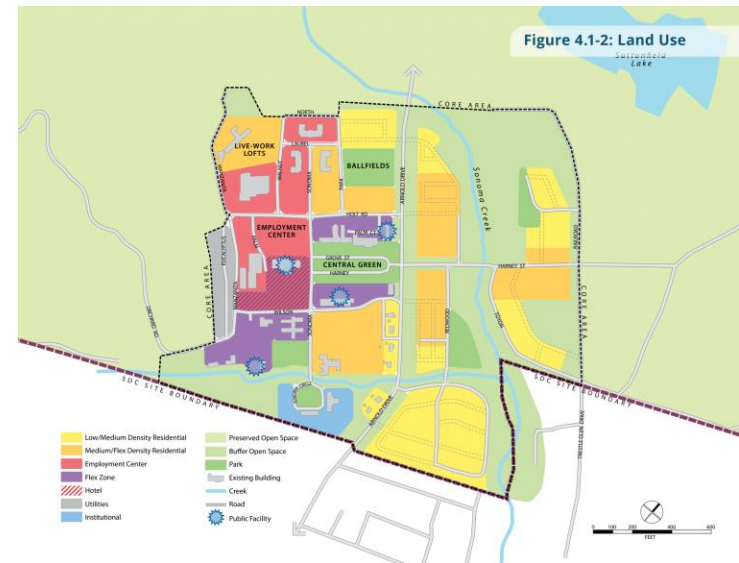
Tips: Project Description

- Does it cover all components? Demolition, construction, and operations?
- Does it provide enough detail for readers to understand what the project is, what it will look like, and how it will operate?
- Does the EIR accurately describe the existing conditions on the site?
- Does the EIR identify the local regulations relevant to the site or area?

Tips: Impact Analysis

The DEIR analysis should:

- use an appropriate baseline
- explain its methodology and show the work
- use accurate, current information and reasonable assumptions
- provide rigorous analysis with supporting evidence
- describe the severity and extent of the impact and impact of mitigation
- analyze *all* of the project's impacts from all components of the Project



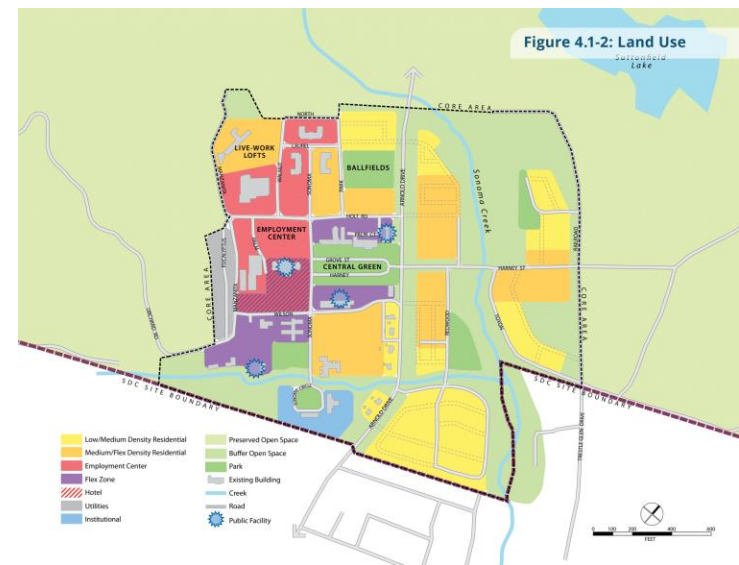
Tips: Impact Analysis

The DEIR analysis should analyze:

- cumulative impacts

Related past, present, and reasonably foreseeable future projects

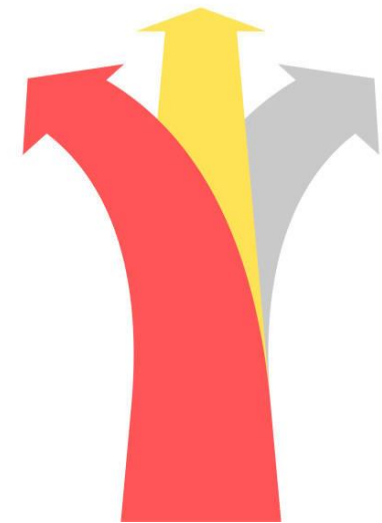
- growth inducing impacts
 - cause population growth
 - remove obstacles to growth



Tips: Alternatives

The Alternatives should:

- Avoid or lessen (one or more) significant effects
- Analyze a “reasonable range” of alternatives that would accomplish “most of the basic objectives of the project”
- Analyze the “no project” alternative
- Identify the “Environmentally Superior Alternative”



Pitfalls

Watch for:

- Incomplete description
- Deferred analysis
- Deferred or vague or unenforceable mitigation
- Inadequate analysis of cumulative and growth inducing impacts
- Reasonable range of alternatives and are they sufficiently analyzed

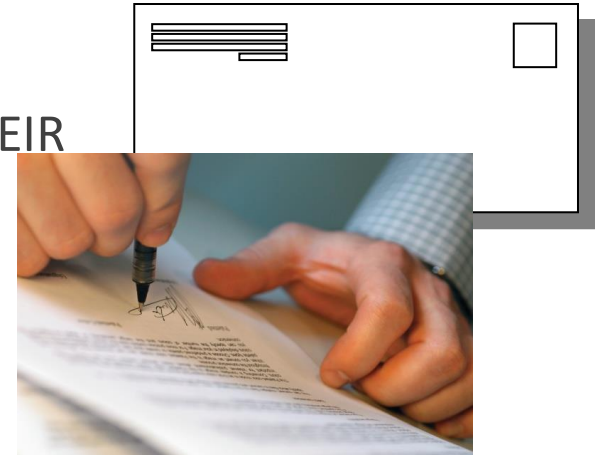




CEQA Comments and Participation

Helpful Topics for Comments

- Comment on both documents but focus on DEIR
- Personal experience/observations
- Errors/omissions in the “project background”
- Mitigation measures (i.e., steps the County could take to make the project less impactful, even if impact is significant and unavoidable)
- Alternatives
- Heartfelt concerns



Tips: Effective Comments

- Submit comments in writing even if commenting orally at hearings
- Substantive comments backed by factual support
- Comments should be written to require a response
- Point out errors, inconsistencies, omissions, and conclusions not based on evidence
- Focus comments on the adequacy of the EIR not on the Project's merit
- Use professional tone and keep criticism constructive

Tips: Effective Comments

DO:

- Use a professional tone
- Focus on the project's environmental impacts and the EIRs inadequacies
- Give examples and evidence in support of the point you are making
- Provide copies of articles, letters, photos or other documents for support

DO NOT:

- Be disrespectful or disparaging
- Simply support or oppose a project
- Make generalizations or refer to impacts on property values
- Make unreasonable demands, e.g., look at a dozen alternatives.

CEQA Online Resources

Governor's Office of Planning and Research (OPR)

<http://www.ca.gov/>

<http://www.opr.ca.gov/ceqa/technical-advisories.html>

[CEQAnet \(ca.gov\)](#)

[General Plan Information - Office of Planning and Research \(ca.gov\)](#)

[Land Use Resources - Office of Planning and Research \(ca.gov\)](#)

[Environmental Goals - Office of Planning and Research \(ca.gov\)](#)

<http://www.capcoa.org/documents/>

Statutes, Guidelines, Appendix G/Initial Study Checklist

<https://opr.ca.gov/ceqa/guidelines/updates.html>

[Browse - California Code of Regulations \(westlaw.com\)](#)