

Public Involvement in the Environmental Review Process

- County and applicant should work together before any public review. The more public review = more time = more \$
- Project description only
- Per the opportunities for public involvement within the current CEQA statutes
- It is always helpful to learn of and try to address comments/concerns early in the process
- County should maintain arms-length relationship with both public and applicant. Public involvement is essential in a democracy and required by CEQA and due process. Any attempt to create extra or special opportunity for Applicant involvement or input will be rigorously opposed!
- Ditto
- Every opportunity for public involvement needs to be available and visible with every opportunity to comment ASAP.
- The public has valuable information and should have the opportunity to be heard at every opportunity.
- Public input is vital at every appropriate stage. Public should have opportunity to comment at every phase where applicant input is required.
- Responses to public comments should be substantive and evidence-based. “Comment noted” is not sufficient in cases where public comment raises issues requiring further investigation.
- The public is generally being asked to trade public resources for private use or development. The public involvement is imperative and should be maximized.
- The greater public involvement, the fewer problems later. Notification of neighbors is usually deficient. A much wider circle for notification should be standard.

Timing and Cost of Environmental Review

- Timing should be consistent with state law but here it isn't even close. Time = \$
- Costs are often prohibitive – streamline whenever possible – involve the applicant at every stage
- Cost of review should be factored into decision to proceed with a project.
- To the extent that excessive applicant meddling in review process is responsible for some delay, these should be limited.
- The cost of environmental review shouldn't dictate doing the review
- Applicant often is the cause of delay in process
- As more development comes around, environmental etc impacts increase proportionally or even exponentially, so it would follow that so do impacts, costs of assessing impacts, costs of mitigating impacts and time to study impacts. There is less and less resources to go around, so more and more care to needs be taken.
- Converting public trust resources to private use/benefit should be a seriously considered process. It should take how much ever time is necessary.
- Much of present delay stems from underfunding of agencies that need to respond. The county should lobby for better funding of these agencies.
- Environmental review needs to be thorough and fully examine all potential environmental impacts. Short cutting this to save cost for the applicant defeats the entire purpose of CEQA.

- We should be working to encourage better projects, not trying to water down process.

EIR Preparation Process

- Inform applicants at earliest possible point in time that applicant prepared technical studies typically increase cost, timeline, and overall processing of an EIR project.
- Make decision on whatever project is consistent or inconsistent with County land policies (zoning etc.) upfront before project is processed.
- Can't be done before EIR
- As a wildlife educator and environmental steward and I'm very concerned about ocean healthy land use, water use and though a novice to this process, plan to be more involved in future issues concerning the above.
- More time to review DEIR - 45 days is generally not enough. Some projects need 50 or more
- Hold multiple scoping meetings if necessary
- Require applicant sign off on project scope/definition very important. How does this impact tweaks or big changes to project as it moves along?
- Start, and stop EIR clock when there are changes to P.O. or new project information submitted.
- Mitigations are an integral part of any project, meaning that impacts of mitigations must be accounted for, and a credible funded plan for long-term mitigation monitoring must be included in any MND or EIR.
- Current process is appropriate and should be maintained.
- Yes
- Can't really see how it can be much improved

Applicant Involvement in the Environmental Review Process

- Since they pay for the EIR, applicant should have some involvement in the CEQA consultant selection process
- Should be a lot of involvement – proactive
- Agreed
- Applicant should have no more involvement than members of the public
- Ditto
- Ditto
- Ditto
- Applicant involvement does not necessarily improve accuracy manipulation of project features is more common than a good faith effort of full disclosure
- At key steps described in option 1
- App involvement likely to bring undue pressure staff, EIR preparer and agencies
- NO
- Current level (I.E., P.D., PO's, Alts, Class I's) is good and helpful. Full review of ADEIR increases cost, time, etc. of overall process.
- Agree with option 2 → benefits process, beyond the benefits decline

- Once a project description is confirmed by the applicant, all communications from the applicant must be on the public record.
- Agree
- Applicants should not be able to choose the CEQA EIR consultants.
- Agree
- Applicants should be allowed to provide input in scoping the project, then once the DEIR is released. Earlier input by the applicant before public review begins allows too much potential for manipulation of the process and political pressure on staff.
- Only in providing details of the proposed project.

Thresholds of Significance

- Important to have them for consistency in preparation of EIRs
- The original intent of CEQA is that the baseline for measuring a significant impact be present conditions prior to the project. This is the common-sense benchmark and should not be departed from.
- Thresholds should rely on expertise and recommendations from applicable resource agencies and be based on policies of those agencies.
- Levels of significance are directly tied to mitigation measures – to simplify – we use the RMS to establish both threshold levels and MMs.
- Don't make them too rigid. Each person is different and the ability to apply appropriate thresholds to individual projects is important.
- Set/Standard TOS's are good (For some areas) but flexibility should be allowed for other issue areas --- and protect projects that involve new technologies that present new impact types (E.G. fiber optic cables on ocean floor, wireless projects, etc.)
- No-Don't change current process

Availability of Administrative Draft EIR

- Not if it involves a time consuming process within the CEQA process
- Would be the equivalent of a 2nd public review process, increasing cost and delay.
- Subjects ADEIR to Public Records Act Requests.
- Availability of ADEIR should be released only if applicant requests – then public gets it.
- ADEIR should remain confidential between applicant/agency. Too much time to release to public
- Release of ADEIR most likely would add more delay in process
- Should be in-house for agency review only.
- ADEIR is intended to correct any deficiencies identified by resource agencies prior to public release. Applicant should not have input at this point- too much potential for conflict of interest.
- The 30-60 day comment period on a DEIR is often inadequate, especially if public groups need to have experts prepare technical reports – the bottom line is if Applicant gets ADEIR, so must the public
- The public needs to be notified of the ADEIR – I'm concerned that if it isn't announced, and the public needs to find out on their own w/ no notice, that the DEIR will slip through.
- Puts too much pressure on staff, agencies. It's very important to protect staff ability to approach project neutrally

- Could create the need for a Pre-ADEIR so that Staff/Consultant team can ensure greatest level of accuracy possible.
- ADEIR review has ramifications for admin records which could ultimately be detrimental to an applicant's project if a CEQA lawsuit is filed