COMMENTING EFFECTIVELY ON AN ENVIRONMENTAL DOCUMENT

Public participation is an essential part of the CEQA process. Review of environmental documents offer interested governmental agencies, private individuals, and organizations an opportunity to consider a proposed project and share expertise; evaluate agency analyses; check for completeness and accuracy; identify areas of concern; and present alternative or additional options for consideration. (California Code of Regulations § 15200).

To comment effectively on an environmental document, consider the following points:

1. Objectively evaluate the project.

   - Consider the activities proposed as part of the project and determine if these actions will result in an adverse impact or change to the physical environment. "Environment" means the physical conditions which exist within the area that will be affected by a proposed project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The area involved is where significant effects would occur either directly or indirectly as a result of the project. The "environment" includes both natural and man-made conditions, including such things as growth and traffic.

   - Consider immediate and future impacts, and temporary and long-term impacts. These are generally associated with both construction and operation of the proposed projects. Short-term or temporary does not necessarily mean insignificant and the indirect impacts of a project, such as growth inducement, may not be evident during construction or initial development.

   - If an impact will occur, will it be substantial or "significant"? Significance is determined by the amount of difference between what currently exists and what will exist during or following completion of the project.

   - If you conclude there would be a significant adverse effect, does the document agree with that assessment?

   - If the impact is potentially significant, are there mitigations (ways to reduce the severity of the impact) included in the document? Will they reduce the impact to a less than significant level? (For an MND, mitigations must reduce <u>all</u> potentially significant impacts to a less than significant level. For an EIR, impacts must be reduced to the extent feasible. All mitigations must be feasible and enforceable.)

   - If a potential significant impact has not, in the reviewer's opinion, been adequately identified; if no mitigation has been proposed for a potentially significant impact; or if the mitigation proposed does not appear to be sufficient or appropriate, the reviewer should:

     - Identify the specific impact in question;

     - Explain why you believe the impact would occur;

     - Explain why you believe the effect would be significant (§15204[b]); and, if applicable,

     - Explain what additional mitigation measure(s) or changes in proposed mitigations you would recommend.

2. Explain the basis for your comments and recommendations (facts, reasonable assumptions based on facts, or expert opinion supported by facts) and, whenever possible, submit specific data and/or references supporting your conclusions (§15204[d]).

3. Make sure comments are submitted before the deadline. Comments postmarked after the close of the public review period may not be accepted. If necessary, fax your comments on or before the close of the review period and follow up by regular mail. Comments must be submitted in writing and must include your name and a valid address. Comments may also be sent by email, but must include your name and physical address; email addresses alone are not sufficient.

4. Reviewing agencies or organizations should include the name of a contact person, who would be available for questions or consultation, along with their comments. (§15204[c]).