

To: CAP
From: Tom I.
RE: General Plan DEIR Weaknesses
DATE: 8/22/18

At the CPC meeting on August 6, we went over the basic weaknesses in the GP DEIR. The list was quite long. CSERC added more:

Existing Summary - No list of issues to be resolved.

-No list of controversies.

Project Description -Not clear enough to evaluate impacts due to vague language.

Setting, Impacts & Mitigation

-Setting left out impact history known to the agency. (Ag, Traffic, Land Use, Noise.)

-Jumped to conclusion regarding impact significance. (Land Use, Air Quality, GHG, Biological Resources, Energy, Noise)

-No commitment to mitigation. (Ag, Land Use, Traffic, GHG, Energy)

-Improper deferral of mitigation without standards. (GHG, Traffic, Land Use, Biological Resources)

-No discussion of mitigation proposed in NOP comments. (Cultural Resources, Traffic, Ag,)

-No explanation of why that mitigation was not adopted. (Cultural Resources, Traffic, Ag,)

Alternatives

-No policy options in any action alternative.

-Insufficient information about action alternatives.

-Range not reasonable without Mintier Draft Plan Alt.

References

-Not citing to the page of references documents.

Unavoidable Impacts

-Feasible mitigation is available.

Cumulative Impacts

-Failed to consider impacts from neighboring places.