

Quick Tips for Effective DEIR Comments

This is intended as a quick guide to help you write effective comments for the Solana Project 'Draft Environmental Impact Report'. To see (or download) the DEIR click on the following link:

<https://www.torranceca.gov/our-city/community-development/planning/butcher-solana>

Smaller files of individuals sections can be found at this link:

<https://www.dropbox.com/sh/1950xx48qsyi76h/AAB0focKDaZ9icl9zIGbMsh4a?dl=0>

It is perfectly OK to raise an issue under the California Environmental Quality Act (CEQA) with no support. The burden of proof is on the Authority who prepared the Draft Environmental Impact Report -- not you! That said, if you have evidence or facts -- even better. Please don't let your "lack of expertise" prevent you from trying to comment on the environmental impact concerns you have. Here are a few tips:

1. **Objectively** evaluate the project and be VERY specific. Generalities can be dismissed with generalities.
2. **Separate your concerns** into clearly identifiable paragraphs or headings and keep a tight focus on each separate issue. Don't mix topics. The individual topics are: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology & Soils, Greenhouse Gas Emissions, Hazards & Hazardous Materials, Hydrology & Water Quality, Land Use & Planning, Noise, Public Services, Transportation, Tribal Cultural Resources, and Utilities & Service Systems
3. **Avoid saying** "I support the Solana Residential Development Project, but..." – just list your concerns or your letter may be classified as a letter of support for the Project. **Your comments should address your environmental concerns, NOT whether you are for or against the project.**
4. **Consider ways to avoid impacts or enforceable ways to reduce the severity of impacts.**
Quantify your objections whenever possible.
If a potential significant impact has not been adequately identified; or
if no mitigation has been proposed for a potentially significant impact; or
if the mitigation proposed doesn't appear to be sufficient or appropriate, then:
 - a. Identify the specific impact in question;
 - b. Explain why you believe the impact would occur;
 - c. Explain why you believe the effect would be significant; and, if applicable,
 - d. Explain what additional mitigation measure(s) or changes in proposed mitigations to the project you recommend.
 - e. Explain why you would recommend any changes and support your recommendations.

Quick Tips for Effective DEIR Comments (Continued)

5. Make sure that any mitigation plan in the DEIR includes a clear definition of “insignificant impact,” AND the means of determining that this level of insignificance has been achieved as a result of the proposed mitigation plan. If you believe there are issues/errors/omissions with the proposed mitigation plan achieving a level of insignificance, OR in determining that this level has been achieved, point these out as specifically as possible and state that these need to be addressed in the Final EIR.
6. Whenever possible, present facts or expert opinions. If not, provide personal experience or your personal observations. **Don't just complain!**
7. Include suggestions for making it better or offer specific alternatives and describe how they meet the requirements of the project. Your goal should be to write something that causes them to respond in a future document based on the evidence you have given.
8. Point out any inconsistencies in the DEIR document or the data. Point out outdated information or errors in logic. Focus on the sufficiency of the EIR in identifying and analyzing the possible impacts of the project on the environment.
9. Write a comment that includes a valid name and address.
Submit it before the deadline which is the close of business on Monday, August 5, 2019.
KEEP A COPY OF YOUR COMMENTS.
10. Reviewing agencies or organizations should include the name of a contact person, who would be available for questions or consultation, along with their comments.

NOTE: Send a copy of your responses and comments by **USPS mail** to →

Oscar Martinez, Interim Planning Manager
 Community Development Department
 3031 Torrance Boulevard
 Torrance, CA 90503

Or, by **e-mail** to: OMartinez@TorranceCA.gov

You might want to email (or call 310-618-5990) Oscar Martinez to verify that your comments were received.

Please send your responses and comments with the subject heading **“Solana Residential Development Project”**, and include your name, phone number, and e-mail address of a contact person at your home or business in all responses submitted.

Quick Tips for Effective DEIR Comments (Continued)

Five Reasons Why You Should Comment on the Draft Environmental Impact Report (DEIR) for the **'Solana Residential Development Project'**

1. The public process allows you to participate in the assessment of the Solana Residential Development Project.
2. If you are generally not worried about this project, then consider that it may be built in ways that negatively affect you, your home, your kids, your neighborhood, or the City of Torrance. The only way to make the City and Developer aware of your individual concerns is to send in comments during this period.
3. This is your opportunity to address any concerns you may have.
4. If you don't think your comments will have any effect, then consider that the only comments that are sure not to have any effect are the ones you don't write. Those you do write must be considered and addressed.
5. If you do not comment, you forgo many of your rights to any recourse in the future if there were inadequacies that were not addressed.

IMPORTANT: If you make reference to ANY document in your DEIR comments (a letter or notice you received, the Torrance Municipal Code, a copy of a presentation you saw - even if it was given by the Authority, etc.) you should include a full copy as part of your DEIR comments.

Think of your comments as testimony in a case. Any documents you are submitting in the future might be considered evidence.

Do NOT assume the City has a copy of any document you are referencing.

Solana Project Silhouettes

At this time the Solana Project Developer will erect the silhouettes approximately 60 days prior to the scheduled Planning Commission Meeting (date not determined at this time) – the meeting could be delayed until early next year! Therefore, the silhouettes might be erected late in 2019 or early in 2020 unless an order from the City requesting earlier erection is issued.