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Board of Supervisors  
County of Napa

December 8, 2014

Re: proposed changes to CEQA procedures

Dear Supervisors:

We are writing in support of the resolution to revise Napa County's CEQA procedures to a) eliminate the option for project applicants to contract directly with environmental consultants, and b) to expand the project public notice radius from 300 to 1000 feet from project parcels.

Regarding a: EIR's are meant to provide objective assessments of possible environmental impacts. Preparation of the EIR is the responsibility of the lead agency. To have environmental consultants hired by the project applicant presents the consultant with an inherent conflict of interest between the requirement for an unbiased report, and the employer's natural desire to push forward with a minimum of required mitigations. Transferring consultant contracts from project applicants to the county should promote confidence that EIR's are complete and unbiased.

Regarding b: Potential project impacts often extend far beyond the project's boundary. Examples include traffic, water supplies, demands on government services, and growth inducement. Expansion of the notification area will allow earlier engagement by affected neighbors, potentially allowing concerns to be addressed earlier in the process, with greater satisfaction to both applicants and neighbors.

We urge you to support these proposed changes to the Napa County CEQA procedures.

Thank you for your consideration,

Nancy Tamarisk  
Vice Chair  
Napa Sierra Club