

LEAGUE OF WOMEN VOTERS OF FRESNO
1345 Bulldog Lane, Fresno 93710 559-226-8683

February 24, 2015

Fresno County Board of Supervisors
2281 Tulare Street, #301, Hall of Records
Fresno, CA 93721

Re: Modification of the County's *Regulations and Procedures for the Implementation of CEQA*

Dear Members of the Fresno County Board of Supervisors,

I have been asked by the League of Women Voters of Fresno (League) to read into the record the following statement regarding Agenda Item #24 – the proposal to modify the County's *Regulations and Procedures for the Implementation of CEQA*.

The League asks this Board not to adopt the *Alternate EIR Preparation Process*, which would enable project applicants to select their own EIR consultants.

The League emphasizes the importance of transparency in government and reminds this Board that CEQA is, above all else, a public disclosure process.

The League has two concerns.

First, it has been the practice of this Board to review and approve EIR contracts prior to their execution. These include contracts between the County and project applicants and contacts between the County and EIR consultants. As you know, each of these contracts includes a scope of work. The staff report for this item suggests to the League that the Department of Public Works and Planning may be able to execute EIR contracts without this Board's prior review and approval.

Second, under this modification, a project applicant, knowing who the EIR consultant will be, can, prior to the submission of a project application, prearrange with the EIR consultant both the scope of the environmental work to be done and the depth of study. In fact, knowing in advance who the EIR consultant will be, the project applicant is free to bypass the County altogether and contract directly with an EIR consultant to prepare an administrative draft of an EIR in advance of submitting a project application to the County, thereby rendering unproductive the effort to maintain the integrity of the CEQA process by having the County contract with an EIR consultant after a project application has been received by the County.

In summation, the League wishes this Board to continue to review all CEQA contracts prior to their execution and to realize that this modification of the County's *Regulations and Procedures for the Implementation of CEQA* weakens the integrity of that process.

The League also wishes to add, in closing, that the County has not only an obligation to prevent impropriety but to prevent, as well, the appearance impropriety.

Thank you,


Radley Reep