

TOP TEN EXPECTATIONS OF COUNTY APPROVED CEQA CONSULTANTS

1. **GET IT RIGHT THE FIRST TIME.** Never submit an incomplete document just to meet a deadline. Proof read, then proof read again. Ensure sentences and paragraphs flow logically. Ensure the technical report is consistent with the current project description and that the report is internally consistent throughout, including documents and maps.
2. **MAKE YOUR PRIMARY OBJECTIVE THE SAME AS THE COUNTY.** The primary objective of consultants is to assist the County in efficiently satisfying the requirements of statutes, ordinances and County policies. Consultants and staff are expected work together in a reasonable and solution-oriented manner to minimize applicant costs and time. Consultants should never take a project advocacy role (“I am fighting for you”). Proposed solutions must always comply with requirements of statute, ordinance and County policy. When our objectives are the same, we can reach a solution more efficiently.
3. **CONSIDER THE COUNTY PART OF YOUR TEAM.** Instead of viewing staff only as project reviewers, use County staff as a resource for information and project direction on design and/or major issues. Maintain open communication with County staff and work as a team.
4. **KNOW APPLICABLE REGULATIONS AND FOLLOW WRITTEN GUIDANCE.** Take time to read and understand all CEQA requirements, ordinances, components of the General Plan including Community Plans and applicable Design Guidelines, and other regulations applicable to the project. Submit a project and associated technical reports that reflect compliance with all applicable regulations and guidance documents, including Guidelines for Determining Significance and Report Format and Content Requirements.
5. **BE HONEST WITH THE PROJECT APPLICANT:** Do not rely on the County to tell project applicants what will be the major project issues. Based on your background research of regulations applicable to the project, tell the applicant up front what to expect and discuss any major project feasibility issues. If you are aware of potential project issues, communicate these to the applicant up front instead of waiting for the issue to be raised in a project scoping or a comment letter.
6. **CONFIRM SCOPE AND APPROACH WITH COUNTY STAFF.** Successful Consultants will contact the County project manager/technical specialists to discuss their Scope of Work before initiating a study. When unusual circumstances or borderline issues arise during writing/research/development of the technical study, consultants should call the County project manager/technical specialists to confirm the feasibility or acceptability of proposed conclusions, mitigation measures, or project conditions prior to submittal of a report. Guessing on borderline issues only promotes additional iterations.
7. **RESOLVE DISAGREEMENTS WITH COUNTY STAFF IN A FACT- BASED MANNER:** While there is an expectation that staff and consultant primary objectives are aligned, it is expected and reasonable that there will be disagreements on technical data, statute, and ordinance and policy interpretation. If there is disagreement, the consultant should approach resolution in the following manner:
 - a. Fully understand staff’s comment/direction and the rationale behind it. Communicate with staff all relevant facts and statutory and ordinance requirements to obtain clear policy direction. Clarification in written form (e-mail) is preferable.
 - b. Should there continue to be a disagreement, contact the County project manager to determine whether the issue should be brought to the County’s *Project Issue Resolution* process. (<http://www.sdcounty.ca.gov/dplu/Resource/docs/3~pdf/DRprocedures.pdf>). After confirmation with the County project manager, contact the applicant and encourage the use of this process.
 - c. If available, utilize project appeal mechanisms.In the end, CEQA documents must reflect the County’s judgment. If the above steps do not resolve differences of opinion, the document must reflect the County’s interpretation and consultants should be prepared to compromise. Similarly, consultants should never attempt to resolve disagreements by debating the issue in a technical study, ignoring staff’s comments, making the issue personal, or by assigning blame to the County.
8. **ALWAYS SUBSTANTIATE CONCLUSIONS.** Substantiate all conclusions using facts and logic. Substantiation need not be lengthy, but must have basis in fact. Avoid circular logic.
9. **LESS IS USUALLY MORE.** Write clear, concise and organized reports using an economy of language. Ensure information is not repeated unnecessarily. Include only required and relevant information.
10. **CONSTANTLY SEEK A BETTER WAY.** Being on the same team means that we can work together to improve. The knowledge, experience and perspective of Consultants is valuable and can contribute towards improvements in the discretionary permit process. When consultants communicate ideas for improvements with County staff, we can more effectively achieve common goals.