



Guidelines for Submitting Comments on a *Program EIR*

1. Know What a Program EIR Is

- A **broad, regional, policy-level** environmental review (e.g., long-range plans, regional transportation or land-use plans).
- Focus is on **framework-level impacts** and **program-wide policies**, not project-level details.

2. Focus Your Comments on CEQA-Relevant Issues: CEQA requires agencies to respond to **substantial evidence-based** comments. Strong comment types include:

- **Inadequate analysis** (missing baseline data, outdated data, unsupported assumptions).
- **Understated impacts** (transportation, housing displacement, cumulative impacts).
- **Inadequate alternatives** (failure to analyze reasonable, feasible options).
- **Insufficient mitigation measures** (too general, unenforceable, deferred, or ineffective).
- **Internal inconsistencies** between chapters, tables, or the planning document.

3. Cite Where the Issue Appears - MTC must respond to **specific** comments.

Use chapter, section, or table references:

- “DEIR, Chapter 3.2, p. 3.2-17 overstates...”
- “Table 4-5 does not align with assumptions in Chapter 2...”

4. Use Evidence. Strengthen your comment by including:

- Factual data (from public agencies, peer-reviewed sources, regional reports).
- Logical connections demonstrating **why** the analysis is incomplete or flawed.
- Examples of better methodologies used in comparable Program EIRs.

5. Make Clear What Should Change: The Governing Board should direct staff to:

- Use updated data
- Reanalyze a section
- Add a missing alternative
- Strengthen or revise mitigation
- Clarify inconsistencies

6. Raise Issues NOW: Program EIRs tier into future project-level reviews. Commenting now preserves your ability to challenge deficiencies later.

7. Be Professional, Specific, and Organized

- Use headings (e.g., **Transportation Impacts, GHG Assumptions, Housing Analysis**).
- Number your comments.
- Keep each point focused.

8. Submit Before the Deadline (December 18, 2025 at 5 pm)

- Include your name, affiliation (optional), and contact details.
- Request confirmation of receipt.