

**Anderson, Colete**

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**From:** CenturyLink Customer <ckeller360@q.com>  
**Sent:** Thursday, April 09, 2015 6:06 PM  
**To:** Cnty 2016 Comp Plan  
**Cc:** Colleen Keller  
**Subject:** comments to the EIS/current planning effort



CP16#0644

**To:** Clark County Community Planning  
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April 8, 2015

This responds to the Clark County Planning Commission's current planning efforts. In particular, we understand the planning team currently seeks to identify alternatives for the proposed Environmental Impact Statement (EIS) on the modified Comprehensive Growth Management Plan. We trust that our comments/recommendations will be appropriately considered/acknowledged.

**General:**

1. Please identify the reasons that have necessitated the current planning revisions to the 2007 Plan. Also state how often future revisions/modifications are anticipated, and what might dictate any future revisions. Once completed, we are concerned how long the EIS would realistically remain in effect before any future Plan revision could be needed and what could necessitate revision to the Plan.
2. Please identify when the draft EIS will be issued as a draft for public comment and if there will be scheduled public hearings on the draft EIS before the document is finalized and subsequent decisions made.
3. Unless the Growth Management Plan specifically provides bonafide provisions that protect the environment, and preserve rural, historic, cultural, wildlife, natural areas and farmland for Clark County, we firmly believe that revisions to the Plan itself must first be established to address these issues (along with human urbanization) before examining alternatives in the Environmental Impact Statement (EIS).

**Specific:**

1. While we recognize that this planning effort focuses on community and urban development, the action alternatives do not provide convincing legal or sound basis for protecting the factors listed in No. 3 (above). We believe that appropriately recognizing the environment, including rural, historic, cultural, wildlife, natural areas, agricultural, and farmland areas in Clark County is of paramount importance while accommodating human growth, expansion, and development.

We urge that this environmental review process be used to establish protection for farmland and agricultural use, so that landowners can make a living off their land and not be taxed off of it. Preserving farmland in an economically viable way would help mitigate the need for landowners to chop their land into small parcels that can lead to unsightly, hard-to-manage growth that creates an onerous burden on the taxpayer.

Other than political and economic reasons for urban growth into the more “rural” areas of Clark County, the EIS alternatives must examine the necessity to maintaining the rural, historic, and cultural presence of the county, including past agricultural uses and farming. The EIS must identify positive (and negative) impacts from creating human growth opportunities into these aforementioned properties. Additionally, impacts to wildlife and their habitat resources) must also be disclosed from potential human growth into previously non-impacted or undeveloped lands in the county.

2. The EIS must clearly define the administrative and physical boundaries for each alternative that will be determined. There should not be overlap between/among the alternatives.
3. During the environmental evaluation process, we believe all proposed alternatives must be equally examined in order to provide a comprehensive, fact-finding disclosure that will enable decision-makers to make most informed decisions in selecting a “preferred alternative.” Although there is some overlap among the alternatives currently proposed, each of them should have their individual parameters, initiatives, and variables that should be objectively analyzed separately to provide a basis for comparison among all alternatives.
4. We support community development and growth within the contiguous “cities” of Clark County (as currently proposed in Alternative 3), that provide the “hubs” for county urbanization. However we don’t see that there are any residential and business growth restrictions in the more rural areas of the county and are quite concerned with possible uncontrolled human expansion into wildlands, forests, farmlands, and wildlife habitat. We believe this must be recognized in a prudent manner during this planning effort!
5. There should be a section in the upcoming EIS to outline any alternatives that have been considered to date, but ruled out for further evaluation along with reasoning why they were no longer considered.
6. The EIS should evaluate short-term, long-term, and cumulative effects for each of the EIS alternatives being evaluated. This would help in the data gathering and analysis of this growth planning effort. Reasonable timeframes should be spelled out for these three terms.
7. The EIS must clearly outline the existing and proposed boundaries for human growth in the county. Any proposed expansion or modification to the current mapped boundaries must be explained/justified.
8. We strongly recommend that “best public use” as applicable to this revised Comprehensive Growth Management Plan and EIS effort, must be explained clearly.
9. As appropriate, the EIS should appropriately identify and define mitigation for preserving the rural, historic, and cultural attributes of human expansion likely in the county.
10. We strongly oppose reducing the zoning of 20 acre parcels (currently ) down to 10 or 5 acre lot sizes within the confines of the EIS, as identified in Alternates 2 and 4. This would reduce the land character, diminish rural settings, restrict open space, and create opportunities for uncontrolled development throughout the county, thereby further changing the rural and natural character of the county.

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