

Schroeder, Kathy



From: Andrew Reule <akreule@tds.net>
Sent: Wednesday, September 16, 2015 4:43 PM
To: Cnty 2016 Comp Plan
Subject: 2016 Comp Plan DSEIS

Regarding the draft Supplemental Environmental Impact Statement for the Clark County 2016 Comprehensive Growth Management Plan:

The analysis of Alternative 4 underestimates the number of potential lots and therefore this alternative's impacts. For example, in the second paragraph on page 2-7, it is stated "...provided that reduced lot sizes do not result in conversions to other uses, there should be no substantive changes or impacts..." Alternative 4 results in the upzoning of some common tracts and remainder parcels within cluster subdivisions (for example parcels 227393020 and 190651016). Although this may require the approval of a new subdivision or plat alteration, this is certainly feasible and should be included in the analysis of impacts. In addition, some lots that will remain too small to divide after upzoning could easily be enlarged through a simple boundary line adjustment. For example, two adjacent lots just under 5 acres in area that are to be upzoned to R-2.5 would not be quite large enough to divide, but a simple BLA between adjacent lots would allow a third lot. In addition, it appears that many "non-conforming" lots proposed for upzoning under Alternative 4 are not non-conforming at all. This is because they appear to have been created by counting adjacent road area. If this is permitted, a lot just under 5 acres upzoned to R-2.5 would allow a division without a BLA. This potential also needs to be considered in gauging the impacts of Alternative 4.

The analysis of water resources under Alternative 4 is not adequate. Due to the additional population allowed in rural areas under this alternative, and the additional lots as referenced above, there needs to be an analysis of shallow aquifer depletion, especially as it relates to surrounding wells. Provisions for clustering as a mitigation measure (page 3-15) would not mitigate impacts to aquifers. While the number of wells may be reduced, the overall volume of water withdrawn would increase.

Due to the sprawling development pattern promoted by Alternative 4, a more thorough analysis of carbon emissions and air pollution is necessary.

Alternative 4 creates probable significant adverse environmental impacts to earth, water, air, fish and wildlife, and natural resources, and transportation systems due to promoting sprawling development patterns. These impacts are not mitigated in the draft SEIS and they are underestimated for the reasons noted in the first paragraph above.