For index!

Gordy,

I assume that Mark McCauley forwarded this email that I sent to him yesterday. I asked for and received his blessing to work with you to address the concerns below. Please contact me at your earliest convenience so we can talk.

I also ask for a copy of the rest of the DEIS as soon as you receive it.

Thank you,

David

Mark,

I ask for your authorization to work with our team to most efficiently refine our Comprehensive Plan Update documents. I’ve read through the draft and would like to discuss with you the following topics:

Page 1-2 has a note at the bottom that says Alt-4 will change the urban / rural split. We will need to do three things to determine that new ratio. 1) Update the actual rural map to remove some of the inappropriate parcels including the Rural Industrial Land Bank, parcels adjacent to the UGBs, and parcels identified by GIS that should have been excluded. 2) Update our population growth rate numbers (on page 1-2) to better align with the latest OFM report (Clark County now being the 2nd fastest growing county in the state). 3) Calculate the new ratio.

Updating the Vacant Buildable Lands Model – a $13,000 home is not realistic for an inhabitable home. We need to bump that number up significantly. Our GIS database should be able to provide us with a graph of property values vs. occupancy. That information should provide us with an objective evidence-based “show your work” threshold. I do not believe we endorse the $13,000 number without that necessary basis. I talked with Bob Pool this morning and he states
that yes, our database includes the necessary information to easily produce that informative graph. I green light from you to authorize it would be appreciated.

Throughout the first four chapters (which is all that we have at this point), there are numbers on many pages that specify the number of lots and number of acres affected by Alternatives 2 and 4. I would like to compare their XLS tables to the ones that we used to generate the maps that we presented in our two open houses. To check our math for accuracy, please provide a link to those files.

I do not see any of the guiding principles that commissioners presented on our March 11, 2015 Power Point Presentation. I do not want to lose sight of that foundation. We’ve gained even more insight now that we are further along and have had multiple conversations with citizens in our two open houses. How do we finalize and incorporate an updated list of concise guiding principles and “show your work” notes that will serve as important basis and justification documentation for the plan that we will finally adopt?

Page 3-6 and 3-8 states that Alternative-4 could have moderate impact on water resources. Page 3-10 says it will have a high impact. I need to know the specifics behind that statement. Which water resources, aquifer consumption, or runoff into streams? Our water quality and stormwater laws require that runoff after development must be limited to pre-European conditions and the purity must not be compromised. If the concern is the consumption of aquifer water through wells, since rural development returns virtually all of that water to the ground (not to sewer systems), it may fallacious to assert otherwise. We need the basis for this claim.

Page 3-10 refers to basins becoming more urbanized. All alternative-4 does not urbanize any properties. So it appears to be an inappropriate implication that it does. The DEIS is to identify impacts. This is not an appropriate concern for Alt-2 or 4.

Page 4-4 states that land managers expressed concern about conversion of AG and FR lands to development. That appears to me to be a misleading statement as Alternatives 2 and 4 do not convert or de-designate any rural AG or FR zones to other uses. This wording can be misunderstood to imply that it does. Allowing smaller AG and FR zones does not "develop" these lands. Rather, Alternative-4 recognizes that many of these parcels are already smaller and smaller parcels facilitates more manageable lot sizes for more landowners to be more successful growing local crops. The cluster options that we adopted as part of Alternatives 2 and 4 were included specifically to mitigate impacts. The DEIS should make that point.

Pages 4-22 and 4-24 state that increased stormwater runoff can affect wetland hydrology. True. But if I understand correctly, DOE law does not allow alternative 2 or 4 to increase stormwater runoff. So this statement appears inappropriate as it implies that these alternatives will violate that law.

I look forward to your blessing so we can effectively work as a team toward an optimized plan.

Thank you,

David
Schroader, Kathy

From: Orjiako, Oliver
Sent: Tuesday, August 25, 2015 3:44 PM
To: Schroader, Kathy
Subject: FW: Comp Plan Update DEIS

Please, index.

From: Euler, Gordon
Sent: Wednesday, July 22, 2015 3:03 PM
To: Madore, David
Cc: Orjiako, Oliver; McCauley, Mark; Cook, Christine; 'Sharese Graham'
Subject: FW: Comp Plan Update DEIS

Councilor:

Here are responses to the questions you sent to Mark on Monday.

Thank you for taking the time to meet with us this morning. I have asked the folks at ESA to make sure the conclusions for each SEPA checklist topic are supported with some examples. It looks like it will be tomorrow before we have the rest of the chapters.

Gordy

From: Euler, Gordon
Sent: Wednesday, July 22, 2015 9:00 AM
To: Cook, Christine
Cc: Alvarez, Jose; Orjiako, Oliver; McCauley, Mark; Horne, Chris
Subject: FW: Comp Plan Update DEIS

Chris:

Here are responses to Councilor Madore’s questions, which you asked us to prepare.

Gordy

From: McCauley, Mark
Sent: Monday, July 20, 2015 3:26 PM
To: Euler, Gordon; Cook, Christine; Horne, Chris
Subject: FW: Comp Plan Update DEIS

All, which of these are legitimate matters to address with Councilor Madore?
For index. Thanks.

From: Cook, Christine  
Sent: Wednesday, July 22, 2015 3:41 PM  
To: McCauley, Mark; Euler, Gordon  
Cc: Alvarez, Jose; Orjiako, Oliver; Horne, Chris  
Subject: RE: Comp Plan Update DEIS

I thought it went reasonably well, and that it is just a beginning.

From: McCauley, Mark  
Sent: Wednesday, July 22, 2015 12:22 PM  
To: Euler, Gordon; Cook, Christine  
Cc: Alvarez, Jose; Orjiako, Oliver; Horne, Chris  
Subject: RE: Comp Plan Update DEIS

I thought the meeting this morning went fairly well. What were your impressions?

From: Euler, Gordon  
Sent: Wednesday, July 22, 2015 9:00 AM  
To: Cook, Christine  
Cc: Alvarez, Jose; Orjiako, Oliver; McCauley, Mark; Horne, Chris  
Subject: FW: Comp Plan Update DEIS

Chris:

Here are responses to Councilor Madore’s questions, which you asked us to prepare.

Gordy

From: McCauley, Mark  
Sent: Monday, July 20, 2015 3:26 PM  
To: Euler, Gordon; Cook, Christine; Horne, Chris  
Subject: FW: Comp Plan Update DEIS
All, which of these are legitimate matters to address with Councilor Madore?

From: Madore, David  
Sent: Monday, July 20, 2015 10:50 AM  
To: McCauley, Mark  
Subject: Comp Plan Update DEIS

Mark,

I ask for your authorization to work with our team to most efficiently refine our Comprehensive Plan Update documents. I've read through the draft and would like to discuss with you the following topics:

Page 1-2 has a note at the bottom that says Alt-4 will change the urban / rural split. We will need to do three things to determine that new ratio. 1) Update the actual rural map to remove some of the inappropriate parcels including the Rural Industrial Land Bank, parcels adjacent to the UGBs, and parcels identified by GIS that should have been excluded. 2) Update our population growth rate numbers (on page 1-2) to better align with the latest OFM report (Clark County now being the 2nd fastest growing county in the state). 3) Calculate the new ratio. The urban/rural split is only a planning assumption used to help distribute expected population. Historically, we've used the split to ensure that there are enough potential lots to accommodate the projected growth in the rural area. Capacity estimates are used to ensure that we can accommodate the projected population growth in both urban and rural areas, and are not used to set the urban/rural split.

Updating the Vacant Buildable Lands Model – a $13,000 home is not realistic for an inhabitable home. We need to bump that number up significantly. Our GIS database should be able to provide us with a graph of property values vs. occupancy. That information should provide us with an objective evidence-based “show your work” threshold. I do not believe we endorse the $13,000 number without that necessary basis. I talked with Bob Pool this morning and he states that yes, our database includes the necessary information to easily produce that informative graph. I green light from you to authorize it would be appreciated. Bob Pool made a presentation to the BOCC at a work session on October 9, 2013. One of the last slides included remaining issues which addressed the $13,000 threshold. The BOCC did not direct staff to make any changes to the model.

Throughout the first four chapters (which is all that we have at this point), there are numbers on many pages that specify the number of lots and number of acres affected by Alternatives 2 and 4. I would like to compare their XLS tables to the ones that we used to generate the maps that we presented in our two open houses. To check our math for accuracy, please provide a link to those files. We can provide the methodology that was used by ESA. We are, however, using the rural vacant and buildable lands model developed by GIS.

I do not see any of the guiding principles that commissioners presented on our March 11, 2015 Power Point Presentation. I do not want to lose sight of that foundation. We've gained even more insight now that we are further along and have had multiple conversations with citizens in our two open houses. How do we finalize and incorporate an updated list of concise guiding principles and “show your work” notes that will serve as important basis and justification documentation for the plan that we will finally adopt? Standard practice is to consider any guiding principles as well as public comment when the preferred alternative is developed. Staff is working on a document for the Board of a list of considerations for generating the preferred alternative.
Page 3-6 and 3-8 states that Alternative-4 could have moderate impact on water resources. Page 3-10 says it will have a high impact. I need to know the specifics behind that statement. Which water resources, aquifer consumption, or runoff into streams? Our water quality and stormwater laws require that runoff after development must be limited to pre-European conditions and the purity must not be compromised. If the concern is the consumption of aquifer water through wells, since rural development returns virtually all of that water to the ground (not to sewer systems), it may fallacious to assert otherwise. We need the basis for this claim. The discussions on pages 3-6 and 3-8 are about Alternatives 2 and 3, respectively. The discussion on page 3-10 is about Alternative 4. Given the potential for increased development in the rural area under Alternative 4, relative to the other alternatives the potential impacts to water resources will be higher.

Page 3-10 refers to basins becoming more urbanized. Alternative-4 does not urbanize any properties. So it appears to be an inappropriate implication that it does. The DEIS is to identify impacts. This is not an appropriate concern for Alt-2 or 4. Agreed. The term should be ‘developed’ rather than ‘urbanized’.

Page 4-4 states that land managers expressed concern about conversion of AG and FR lands to development. That appears to me to be a misleading statement as Alternatives 2 and 4 do not convert or de-designate any rural AG or FR zones to other uses. This wording can be misunderstood to imply that it does. Allowing smaller AG and FR zones does not "develop" these lands. Rather, Alternative-4 recognizes that many of these parcels are already smaller and smaller parcels facilitates more manageable lot sizes for more landowners to be more successful growing local crops. The cluster options that we adopted as part of Alternatives 2 and 4 were included specifically to mitigate impacts. The DEIS should make that point. ESA has been asked about who the land managers are in the sentence on page 4-4. The purpose of the DSEIS is to inform decision-makers about the possible consequences of particular actions. None of the alternatives create development, but if thousands of additional lots are developed as a result of it, there are potential consequences on all rural Clark County resources. This is especially true for resource lands, which GMA says are supposed to be primarily for resource uses.

Pages 4-22 and 4-24 state that increased stormwater runoff can affect wetland hydrology. True. But if I understand correctly, DOE law does not allow alternative 2 or 4 to increase stormwater runoff. So this statement appears inappropriate as it implies that these alternatives will violate that law. As stated above, none of the alternatives create development. Any addition of impervious surface will increase the potential runoff from a site, and this increased runoff has to be addressed per state law. Impervious surfaces keep groundwater recharge from happening and concentrate potential pollutants that do manage to infiltrate. Single developments may have a minimal impact but the cumulative effects over a wider area will affect both the quality and quantity of water resources.

I look forward to your blessing so we can effectively work as a team toward an optimized plan.

Thank you,

David