Lincoln County Planning Department
Post Office Box 329
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October 10, 2011

Nevada Groundwater Projects Office
Attn: Penny Woods
P.O. Box 12000
Reno, NV 89520

RE: Comments to Draft Clark, Lincoln, and White Pine Counties Groundwater Development Project EIS

Dear Ms. Woods:

The Lincoln County Planning Department (Department) appreciates this opportunity to provide comment on the Draft Environmental Impact Statement for the Clark, Lincoln, and White Pine Counties Groundwater Development Project (Project).

The Department would like to emphasize the complex magnitude of impacts to critical resources, as a result of the project, that provide necessary social and economical benefits to Lincoln County.

Please feel free to contact the Lincoln County Planning Department with questions or concerns.

Sincerely,

Cory Lytle
Lincoln County Planning Department

Document Review Form

Clark, Lincoln, and White Pine Counties Groundwater Development Project Draft EIS

Reviewer's Name: Cory Lytle: Lincoln County Planning Department
Contact: clytle@lincolnnv.com

Reviewer's Organization: Lincoln Co., NV.

Primary Disciplinary Area: Lincoln County Planning and Building Department- Lincoln County Nevada

Section or Chapter Number and Date of Reviewed Document: **Chapter 1: Purpose and Need**

EIS Section	Page/Line	Comment/Suggested Revision
1.5.5	1-12/ Table	The Department will require a full development agreement upon the granting of a Right-of-Way and prior to construction between the applicant and Lincoln County; specifically prior to construction commencing within Lincoln County. Applicable fees, reviews, amendments, and other necessary administrative functions will apply. Included within the Development Agreement will be conditions addressing the Rights-of-way and project facilities as well as groundwater development. These include: all applicable permits, required bonds, other associated services provided by the county, potential development activities impacting the county, and mitigation both short and long-term. Condition-based best management practices will be included. In addition, all stipulating conditions will address the proposed additional facilities and rights-of-way (tiered components) that will be associated with the project.

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Section or Chapter Number and Date of Reviewed Document: **Chapter 2: Description of the Proposed Action**

EIS Section	Page/Line	Comment/Suggested Revision
2.3.1	2-9	The Department fully supports the incorporation of Best Management Practices listed in Table 2.3.1. In addition, the Department will require site-specific county-related BMP's relative to specific development activities and conditionally incorporated within the Development Agreement with Lincoln County. Subsequent NEPA tiering documents should also address site specific impacts to resources.

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Section or Chapter Number and Date of Reviewed Document: **Chapter 3: Affected Environment and Environmental Consequences**

EIS Section	Page/Line	Comment/Suggested Revision
3.20	3.20-1	The Department fully supports the incorporation of Mitigation/Monitoring Measures set forth in Table 3.20-1 (Tier 1 Measures). In addition, certain resource-specific measures, unique to Lincoln County and impacting Lincoln County, will be identified relative to the Development Agreement and conditionally incorporated within. Additional tiering-related mitigation/monitoring measures will be addressed in similar fashion.

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Section or Chapter Number and Date of Reviewed Document: **Chapter 4: Irreversible and Irretrievable Commitments of Resources**

EIS Section	Page/Line	Comment/Suggested Revision
4	Table 4.0-1-GENERAL	The potential for the irretrievable loss of the vast variety of resources as a result of the project is of major concern for the Department. The all-encompassing potential loss of the very resources that provide current economical, social, and environmental stability to Lincoln County as well as other affected areas is tremendous considering the ripple-effect of both direct and indirect impacts. The Department will consider all resources listed in Table 4.0-1 in addressing issues relevant to Lincoln County and the applicant during the development agreement process.

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Section or Chapter Number and Date of Reviewed Document: **Appendix E: Conceptual Plan of Development**

EIS Section	Page/Line	Comment/Suggested Revision
Appx. E Conceptual POD	**A-46: Adaptive Management Plan and Measures**	The Department formally requests that a representative from the Lincoln County Water District have a formal position regarding implementation of the Adaptive Management Plan up to and including the time of the Groundwater Withdrawal Period. This position should have full input in the elements described within the adaptive management framework, including: Environmental Goals and Objectives, baseline Data Collection and Monitoring, Identification of Environmental Indicators and Adaptive Management Thresholds, Monitoring Commitments, Reporting Commitments, Plan Implementation, and Adaptive Management Measures.