

## Timothy Bleasdale

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**From:** Timothy Bleasdale  
**Sent:** Friday, January 31, 2025 4:50 PM  
**To:** Gary Goeschel  
**Cc:** Tracy M. Collins  
**Subject:** Planning Commission draft regulations

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Gary,

I've been working my way through the draft regulations. I will provide you with more detailed comments, but I will not be able to do so today. I am still working through this. The major point that I think I need to convey for now is that the Commission appears to have overcorrected its direction in response to Mark Zamarka's August memo. He advised them to define what a "significant effect" is and try to use identifiable criteria or guidelines to do so. The draft I am looking at seems to keep redefining "significant effect" and restate different frameworks for making the determination in Sec. 2, 4-14-2, 4-14-3, 4-14-4, and possibly 4-14-5.

Additionally, I wanted to raise a question that I keep asking as I read the draft. What is the purpose of the EIS or what is the Commission trying to accomplish? You mentioned previously that a lot of the information required in an EIS is already provided elsewhere in an application, so that an EIS is just culling and restating information. Is that the purpose – a formatting rule to provide a single place to look for issues of environmental concern? The draft regulations do not authorize a denial of an application based on an EIS, and the Conservation Commission review is only advisory. A lot of the language in here suggests that the Commission is supposed to act on the EIS in some way, but these regulations never actually state what the Commission is supposed to (or allowed to) do. I might be able to provide better guidance if I understood what the Commission is trying to achieve.

I hope you have a good vacation next week.

Best regards,  
Tim

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