

Gov. Rec. County Assessments - FY19

Division	Budget Act	Description	Casson City	Chemical	Clark	Douglas	Elgin	Emeryville	Essex	Humboldt	Leadville	Litchfield	Lyon	Mineral	Myra	Perkins	Stacey	Washoe	White Pine	TOTAL
COUNTY ASSESSMENT FOR SERVICES																				
DHCFP	3243	MAABD Institution Costs for Persons with Income over 156% of the Federal SSI Rate	\$759,227	\$188,833	\$12,865,982	\$288,317	\$478,897	\$9,734	\$11,680	\$313,425	\$140,165	\$91,497	\$642,423	\$105,124	\$404,823	\$99,284	\$35,081	\$2,897,850	\$140,165	\$19,467,345
DHCFP	3243	MAABD Institution and Waiver Costs for Persons with Income over 142% of the Federal SSI Rate	\$450,193	\$112,425	\$5,461,716	\$147,528	\$184,103	\$6,137	\$15,465	\$117,826	\$38,229	\$17,426	\$219,941	\$28,875	\$174,038	\$15,710	\$15,219	\$1,613,231	\$62,233	\$8,489,897
ADSD	3167	Rural Developmental Services Costs	\$7,576	\$3,744		\$12,290	\$5,132			\$10,791	\$1,332		\$13,431	\$1,588		\$1,687	\$4,342	\$4,511	\$2,157	\$66,281
ADSD	3279	Southern Developmental Services Costs			\$2,151,607						\$1,200				\$12,000					\$2,164,807
ADSD	3180	Northern Developmental Services Costs																\$712,119		\$712,119
DCFS	3263	Youth Parole Services	\$55,291	\$23,945	\$2,337,591	\$46,508	\$68,356	\$175	\$1,410	\$24,358	\$6,928	\$8,982	\$57,186	\$3,226	\$48,134	\$4,735	\$2,955	\$469,148	\$4,977	\$8,157,909
DCFS	3147	Youth Alternative Placement	\$364,704	\$163,762		\$169,530	\$442,693	\$3,326	\$11,044	\$148,687	\$42,683	\$42,896	\$347,776	\$21,539	\$222,883	\$17,674	\$17,525	\$3,003,534	\$60,166	\$6,190,196
DCFS	3229	Child Protective Services	\$507,249	\$288,573		\$178,394	\$576,283	\$4,856	\$17,928	\$194,939	\$66,903	\$37,944	\$544,150	\$47,248	\$360,557	\$49,151	\$26,915		\$84,602	\$8,385,684
DPHH	3194	Consumer Health Protection (Food and Facilities)		\$51,265			\$143,926	\$4,935	\$8,224	\$54,829	\$18,094	\$17,819	\$87,452	\$14,804	\$99,789	\$13,981	\$27,689	\$16,440	\$33,171	\$992,426
DPHH	3224	Community Health Nursing Base Contracts		\$114,498			\$5,371	\$19,452	\$1,321	\$96,427	\$31,672	\$33,552	\$141,909	\$41,811	\$118,150	\$2,058			\$18,248	\$621,497
DPHH	3224	Medical Care Related to TB Program																		\$0
DPHH	3224	Medical Care Related to STD Program																		\$0
DPHH	3655	Lakes Crossing	\$1,562	\$8,750		\$470	\$5,680	\$0	\$700	\$2,100	\$0	\$0	\$8,400	\$1,760	\$10,500	\$700	\$0	\$10,710	\$1,400	\$11,080
PD	1499	Public Defender's Office	\$1,185,133														\$77,709			\$1,262,842
CHHS TOTAL			\$3,330,938	\$955,815	\$23,318,896	\$1,442,897	\$48,614	\$67,797	\$961,881	\$386,023	\$251,298	\$1,062,668	\$245,559	\$1,461,872	\$214,988	\$204,394	\$427,119	\$427,119	\$427,119	\$45,164,073

Note:
 Amounts related to TB and STD are not broken out. Those charges only occur if an outbreak were to happen.
 The Lakes Crossing assessment is based on the FY16 actual charges.

**County Match Assessments
Summary by County and Population**

County	New Population			Traditional Population			TOTAL		
	Leg. Appr. Assessment	Proposed Assessment	Difference	Leg. Appr. Assessment	Current Projection	Difference	Leg. Appr. Assessment	Proposed Assessment New Pop. + Current Projection Trad. Pop.	Difference
Carson City	\$450,193	\$659,819	\$209,626	\$759,227	\$485,375	(\$273,852)	\$1,209,420	\$1,145,194	(\$64,226)
Churchill	\$112,425	\$263,838	\$151,413	\$188,833	\$120,847	(\$67,987)	\$301,258	\$384,685	\$83,426
Clark	\$5,461,716	\$11,989,734	\$6,528,018	\$12,865,982	\$11,373,371	(\$1,492,611)	\$18,327,698	\$23,363,105	\$5,035,407
Douglas	\$147,528	\$184,243	\$36,715	\$288,117	\$230,527	(\$57,590)	\$435,645	\$414,770	(\$20,875)
Elko	\$184,103	\$386,471	\$202,368	\$478,897	\$432,934	(\$45,963)	\$663,000	\$819,405	\$156,405
Esmeralda	\$6,137	\$2,529	(\$3,608)	\$9,734	\$16,424	\$6,690	\$15,871	\$18,953	\$3,082
Eureka	\$15,465	\$18,022	\$2,557	\$11,680	\$7,566	(\$4,115)	\$27,145	\$25,587	(\$1,558)
Humoldt	\$117,826	\$174,986	\$57,160	\$313,425	\$191,035	(\$122,390)	\$431,251	\$366,021	(\$65,229)
Lander	\$28,229	\$59,068	\$30,839	\$140,165	\$196,365	\$56,200	\$168,394	\$255,433	\$87,039
Lincoln	\$17,428	\$2,529	(\$14,899)	\$91,497	\$132,730	\$41,233	\$108,925	\$135,259	\$26,334
Lyon	\$219,941	\$545,931	\$325,990	\$642,423	\$493,138	(\$149,285)	\$862,364	\$1,039,069	\$176,705
Mineral	\$28,475	\$101,115	\$72,640	\$105,124	\$299,812	\$194,688	\$133,599	\$400,927	\$267,329
Nye	\$174,038	\$223,140	\$49,102	\$404,921	\$297,875	(\$107,046)	\$578,959	\$521,015	(\$57,944)
Pershing	\$15,710	\$76,413	\$60,703	\$99,284	\$175,496	\$76,212	\$114,994	\$251,909	\$136,916
Storey	\$15,219	\$20,040	\$4,821	\$35,041	\$17,585	(\$17,456)	\$50,260	\$37,626	(\$12,635)
Washoe	\$1,613,231	\$3,371,708	\$1,758,477	\$2,892,850	\$1,875,914	(\$1,016,936)	\$4,506,081	\$5,247,623	\$741,541
White Pine	\$82,233	\$7,201	(\$75,032)	\$140,165	\$144,385	\$4,220	\$222,398	\$151,587	(\$70,811)
TOTAL	\$8,689,897	\$18,086,786	\$9,396,889	\$19,467,365	\$16,491,380	(\$2,975,985)	\$28,157,262	\$34,578,166	\$6,420,904

Notes:

- The New Population assessment amounts are capped at the Leg. Approved assessment. The division is proposing to increase this amount through IFC approval of a work program.
- The assessment for the Traditional Population is not limited to the Leg. Approved amount. It is based on the non-federal share of actual medical services received by County Match clients. An updated projection is provided because this biennium's caseload for the Traditional Population is lower than projected for the Leg. Approved budget.
- The numbers above are based on August 2018 caseload projections and FY18 average expenditures per client.
- Total assessments for counties with populations below 100,000 are capped at the county's FY19 8 cent cap.



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August 17, 2018

Edward A. Boling, Associate Director
Council on Environmental Quality
730 Jackson Place, NW
Washington, DC 20503
(202) 395-5750

RE: Input from the Nevada Association of Counties Pursuant to the Council on Environmental Quality's Advance Notice of Proposed Rulemaking Regarding Update to the Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act

Dear Mr. Boling,

The Nevada Association of Counties ("NACO") greatly appreciates the opportunity to provide input on the Council on Environmental Quality's (CEQ) Advance Notice of Proposed Rulemaking (ANPRM) regarding Update to the Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA; Docket No. CEQ-2018-0001). NACO works with counties to adopt and maintain local, regional, state and national cooperation which will result in a positive influence on public policy and optimize the management of county resources.

NEPA plays a critical role in the ability of Nevada's counties to manage their natural resources while providing a myriad of fundamental services to local communities. Therefore, it is imperative that counties take an active role in the NEPA process. It is from this perspective that NACO, on behalf of Nevada's 17 counties, is providing input. NACO kindly requests the CEQ consider the following responses to CEQ's questions when updating the procedural provisions of NEPA.

Q1. Should CEQ's NEPA regulations be revised to ensure environmental reviews and authorization decisions involving multiple agencies are conducted in a manner that is concurrent, synchronized, timely, and efficient, and if so, how?

Current NEPA regulations indicates Agencies should prepare draft environmental impact statements concurrently¹, but too often this is not done effectively causing delays and copious

¹ 40 C.F.R. §1502.25(a): "To the fullest extent possible, agencies shall prepare draft environmental impact statements concurrently with and integrated with environmental impact analyses and related surveys and studies

paperwork. The NEPA process for a typical environmental impact statement can take several years and can take even longer when multiple Agencies are involved. This violates a principal aim of NEPA: to reduce delays². Regular communication between Agencies is imperative for efficient decision making. Although the current NEPA regulations encourage interagency cooperation and simultaneous preparation of environmental reviews³, a clear process for how this is done should be outlined in the regulations for implementing the procedural provisions of NEPA.

Therefore, it is NACO's recommendation that Federal agencies preparing environmental reviews should be required to communicate regularly and prepare reviews concurrently. It is also NACO's recommendation that the CEQ outline a specific process and the necessary elements for such interagency cooperation in the NEPA regulations.

Q2. Should CEQ's NEPA regulations be revised to make the NEPA process more efficient by better facilitating agency use of environmental studies, analysis, and decisions conducted in earlier Federal, State, tribal or local environmental reviews or authorization decisions, and if so, how?

Yes. A principal aim of NEPA is to make better decisions⁴. This requires collecting and analyzing meaningful data during environmental reviews. Meaningful, quality data can be characterized by the data's degree of relevance, accuracy, credibility, timeliness, accessibility, interpretability, and coherence.⁵ The NEPA process should always be based on sound science and quality data, not biased interpretations to fit any one agenda. There must be procedural consistency for this process.

Because access to quality data is essential for preparation of any environmental document, NACO strongly encourages NEPA preparers to seek data resources available at the county and state levels. To accurately describe the affected environment and potential environmental impacts in the NEPA process, the affected environment's natural resource and socioeconomic characteristics must be known. Local data provides the clearest picture of those characteristics. These resources are developed by those with the most insight at the ground level because they are living and working within the communities that are directly impacted by the proposed action.

For example, the state of Nevada provides many resources relevant to the NEPA process including data related to population and demographics and socioeconomic characteristics of counties and local communities. The University of Nevada Reno's W.M. Keck Earth Sciences and Mining Research site provides a plethora of GIS imagery and valuable data as do many Nevada county GIS data warehouse sites. Also, researchers at the University of Nevada Cooperative Extension and College of Business are currently in the process of creating socioeconomic baseline data for every county in Nevada.

required by the Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq.), the National Historic Preservation Act of 1966 (16 U.S.C. 470 et seq.), the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq.), and other environmental review laws and executive orders."

² 40 C.F.R. §1500.5

³ 40 C.F.R. §1500.5(b)

⁴ 40 C.F.R. §1500.1(c): "Ultimately, of course, it is not better documents but better decisions that count. NEPA's purpose is not to generate paperwork – even excellent paperwork – but to foster excellent action."

⁵ Organisation for Economic Co-operation and Development (OECD), "Quality Framework for OECD Statistics", Paris, June 2002. http://www.oecd.org/document/43/0,2340,en_2649_34257_21571947_119820_1_1_00.html



Therefore, it is NACO's recommendation that the CEQ provide procedural consistency that requires the use of meaningful, quality data and requires or strongly encourages the use of local data during the NEPA process.

Q4. Should the provisions in CEQ's NEPA regulations that relate to the format and page length of NEPA documents and time limits for completion be revised, and if so, how?

Yes. NEPA CEQ Regulation §1502.7 indicates Agencies should prepare concise environmental impact statements specifying documents be limited to 150 pages unless of "unusual scope or complexity" in which case they should be at most 300 pages in length⁶. Many NEPA documents greatly exceed this recommended page limit by hundreds of pages and many environmental impact statements are 1,000 pages or more. While NACO recognizes the need for appropriate discussion of the affected environment and potential environmental impacts, there should be a limit to the verbosity or, at the very least, extension of the comment period to give the public enough time to review such cumbersome documents.

Not only would an appropriate page limit make the NEPA process more efficient, it would also promote public engagement. A NEPA document which is 1,000+ pages is often a non-starter for many local governments and those concerned citizens that simply do not have the resources to review and provide comments on such lengthy documents. The public involvement process should not exclude these communities and local governments simply because they don't have the staff or resources to conduct such a lengthy review.

Therefore, it is NACO's recommendation that environmental documents have a required standard length or page limit that is adhered to by all Agencies and NEPA preparers and/or comment periods need to be lengthened to provide the public enough time to review and provide comment on these proposed actions.

Q6. Should the provisions in CEQ's NEPA regulations relating to public involvement be revised to be more inclusive and efficient, and if so, how?

Yes. One of the principal aims of NEPA is to produce better decisions. This can only be accomplished when counties have a seat at the table through meaningful public involvement. Counties and local government should always be invited to participate in the NEPA process, regardless of cooperating agency status. The decisions made as a result of NEPA, impact local communities and counties at the ground level. Too often, counties are invited to participate in the NEPA process only after a draft environmental document has been produced, that is if they are invited at all. This is far too late in the process. Counties and local communities should have a seat at the table from the start of the process and impacted counties' master plans should be consulted and incorporated into the alternatives analysis.

NACO believes public comments should be based on the principles of science and supported by quality data. However, in order to provide such robust assessments of proposed actions, the public needs an appropriate amount of time for review. Many environmental documents are hundreds, if

⁶ 40 C.F.R. § 1502.7



not thousands, of pages long and require ample time and research to fully understand the implications and consequences of the proposed action(s). Therefore, it is important for Agencies to provide sufficient time or other support during comment periods for the public to perform the necessary research to identify and provide comment on those Implications.

It is NACO's recommendation that all NEPA preparers be required to extend invitations to counties and local government for all potential public involvement activities including, but not limited to, scoping meetings, public hearings, open houses, and requests for public comments. County master plans must be consulted and appropriately incorporated into the alternatives analysis. In addition, comment periods should be of sufficient length to allow the public to provide meaningful comments on proposed actions. Allowing local government and communities to voice their concerns, offer advice, or simply express their thoughts early in the process not only promotes transparency and public support, but will also result in a much more inclusive and efficient NEPA process.

Q7. Should definitions of any key NEPA terms in CEQ's NEPA regulations be revised, and if so, how?

Yes. The definition of Cooperating Agency should be revised to be more inclusive of State and local governments as well as Indian Tribes when there are potential effects on a reservation. Nevada's counties are dedicated to staying involved in Federal land and resource planning issues as these decisions are tied to counties' abilities to provide fundamental services.

The current definition of "Cooperating agency" reads as follows:

Cooperating agency means any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment. The selection and responsibilities of a cooperating agency are described in §1501.6. A State or local agency of similar qualifications or, when the effects are on a reservation, an Indian Tribe, may by agreement with the lead agency become a cooperating agency.⁷

NACO suggests the definition be revised as follows:

Cooperating agency means any Federal, State, or local agency, or Indian tribe when the effects are on a reservation, other than the lead agency, which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment. The selection and responsibilities of a cooperating agency are described in §1501.6.

⁷ 40 C.F.R. §1508.5



Q8. Should any new definitions of key NEPA terms be added, and if so, which terms?

Yes. The requirements of the Purpose and Need (P&N) section of environmental documents need to be better defined and clarified in the NEPA regulations. The current description of the P&N as described in §1502.13 of the CEQ NEPA regulations is brief and does not provide any specific details of the requirements of this section⁸. This results in P&N statements that are too general and lacking in measurable objectives or goals.

The discussion of alternatives is the heart of the environmental impact statement⁹. In the past NACO has provided recommendations and comments regarding the preferred alternative only to have those comments rejected because the recommendations did not fit the purpose and need of the proposed Federal action. Without a clear, defined P&N the public is at a disadvantage when providing comments on proposed alternatives or presenting new ideas. Furthermore, without specific, measurable objectives and a need based on quantifiable data, there is no methodical, systematic way to audit the preferred alternative once it has been implemented. A need supported by data and a purpose that describes measurable goals would strengthen discussions of alternatives, resulting in a more efficient and systematic NEPA process.

It is NACO's recommendation that the Purpose and Need be defined in the CEQ's NEPA regulations and that the definition include a requirement for measurable objectives.

Q13. Should the provisions in CEQ's NEPA regulations relating to the appropriate range of alternatives in NEPA reviews and which alternatives may be eliminated from detailed analysis be revised, and if so, how?

Yes. The alternatives analysis is an integral part of the NEPA process. However there is often disagreement as to what constitutes a reasonable range of alternatives. This can be alleviated if the alternatives development includes consultation with the States and counties that are directly impacted by the proposed action(s). Specifically, State and county master plans must be consulted and incorporated into the alternatives analysis when available. Including State and counties at this stage allows for early discussion and resolution of any inconsistencies between the proposed action and the state and county's standards and goals which will result in greater public support and acceptance of the preferred alternative.

Conclusion

NACO again appreciates the opportunity to provide input at this early juncture, and looks forward to working with the Council on Environmental Quality as they propose and finalize an update to the procedural provisions of NEPA. NEPA is an incredibly valuable and relevant decision-making tool (if, and only if, the original intent of the Act is maintained and can't be used to carry out any individual agenda). NEPA should be based on verifiable data and sound science which at its core is

⁸ 40 C.F.R. §1502.13: "The statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action."

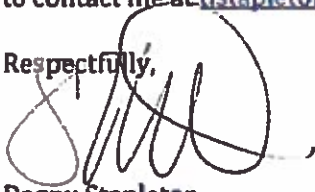
⁹ 40 C.F.R. §1502.14



systematic and free from personal bias and opinion. Also, the NEPA process can only be made better from input at the local level. Engaging with local governments and communities will lead to better ideas, better information, and ultimately better decisions.

Thank you for considering these important issues. If you have any questions, please do not hesitate to contact me at dstapleton@nvnaco.org, or by phone at (775) 883-7863.

Respectfully,



Dagny Stapleton
Executive Director

