

**SIERRA CLUB LAKE GROUP
15995 LUCY CIRCLE
LOWER LAKE, CA 95457**

November 6, 2005

Richard Coel, Principle Planner
Community Development, Planning Department
255 N. Forbes St.
Lakeport, CA 95453

RE: proposed Cristallago development

Dear Mr. Coel:

The Sierra Club Lake Group is grateful for the opportunity to review the proposal for this subdivision, which we think represents the antithesis of smart growth -- it's demented growth. Our reasons are as follows:

(a) The entire property lies outside the North Lakeport urban area specified in the draft of the new General Plan.

(b) Portions of the property are currently protected by the Williamson Act. The developer states (several times) that the land is not currently in agricultural use except for some cattle grazing, and that it has no agricultural potential, but the Williamson Act status tends to belie this assertion. In any case, in return for their substantial tax breaks landowners must accept stringent limitations on potential development. In this case those limitations will expire in 2010; we see no justification for accelerating this process.

(c) Adjacent properties are currently in agricultural production, which could be substantially impeded by the presence of a massive upscale subdivision in the immediate vicinity.

(d) The county has more than enough golf courses already.

(e) Twelve hundred units would consume a disproportionate share of the capacity of the sewage treatment plant, and also place burdens on the roads, the schools, fire and policing capacity, and other infrastructure. Experience has shown that such costs are seldom fully compensated by an increase in the tax base.

(f) The vast majority of the houses would be constructed on terrain that appears (on the small and rather fuzzy topographical map accompanying the proposal) to slope toward the east and north: ie towards Clear Lake. The impact on the viewshed as seen from Highway 29, from the North Shore, and from the lake itself, would be drastic, and drastically detrimental.

(g) Serpentine soils underlie much of the property, which greatly increases the likelihood that rare and perhaps endangered plant species, plant communities, and habitat types are present.

(e) The commercial portions of the proposal would detract from the viability of downtown Lakeport. In particular, the proposed facility showcasing Lake County wines is something that belongs in one of the county's existing town centers, with pedestrian access and nearby tourist amenities, not in a subdivision miles away.

A year ago the Planning Department set a prudent precedent by rejecting the proposed Valley Oaks subdivision adjacent to Hidden Valley Lake. For the reasons outlined above we recommend turning this one down too. If such summary dismissal is not feasible, then a full Environmental Impact Report should certainly be required as a prerequisite of any development whatsoever. Indeed, even if the specifics of the project seemed more favorable, its size and scope alone would demand the thorough examination of environmental consequences that nothing but an EIR can provide.

Yours sincerely,

Victoria Brandon
Lake Group Chair