

Sierra Club Lake Group

15995 Lucy Circle Lower Lake, CA 95457

August 16, 2007

Penelope Shibley
Community Development Department
Planning Division
255 N. Forbes Street
Lakeport, CA 95453

RE: Mulvaney Subdivision

Dear Ms Shibley:

Thank you for giving the Lake Group an opportunity to comment on this subdivision proposal. We recommend that the application be rejected, on the indisputable grounds that the proposed densities are grossly inconsistent with the very recently adopted Rivas Area Plan. Furthermore, the entire site lies outside the Riviera Community Growth Boundary proposed by the revised General Plan that is now nearing the final pre-adoption stages, and that will almost certainly be in force long before this application is brought before the Board of Supervisors. It would actually be doing prospective developers a significant favor to make it very clear that proposals which do not conform to the planning guidelines established by the community stand no chance of acceptance, and that bringing them forward does nothing but waste everyone's time and money.

The project raises other more limited concerns as well:

- The houses will be built on cul de sacs that exceed the county's 1000 foot length limit, a consideration of particular urgency given the likelihood of wildfire on the surrounding undeveloped land. To make the situation even worse, the sole access to the more distant lots in the eastern segment would be provided by a road that crosses a fault zone boundary line. The potential for catastrophic loss of property, and even loss of life, is obvious.
- Neither segment of the subdivision could be accessed directly from a highway or arterial street, meaning that all traffic generated by these 159 units must pass through existing residential streets, to the obvious detriment of their current inhabitants.
- The topography of the site seems quite complex, but portions of the development would undoubtedly be visible from Highway 281 and possibly Highway 29 (a scenic corridor), and the western segment appears to be within the viewshed of Clear Lake and the opposite shore. Any of these detrimental visual impacts to the slopes of Mt Konocti – one of the two primary iconic images of Lake County -- would be harmful to the whole community.

- In principle, we think that dense residential subdivisions should be discouraged in areas where public water and sewer services are not available. This site has neither.
- The design of the western segment providing access to the larger peripheral lots by long (180 foot!) panhandles has nothing to recommend it as far as we can see.

Again, we recommend rejection of this application, but if for some reason that does not occur would very strongly argue that an Environmental Impact Report should be required before any approvals are considered.

Yours sincerely,

A handwritten signature in black ink that reads "Victoria Brandon". The signature is written in a cursive, slightly slanted style.

Victoria Brandon

Chair, Sierra Club Lake Group