

Sierra Club Lake Group

15995 Lucy Circle Lower Lake, CA 95457

August 16, 2007

Kevin Ingram
Community Development Department
Planning Division
255 N. Forbes Street
Lakeport, CA 95453

RE: Lake Vineyard Estates

Dear Mr. Ingram:

Thank you for giving the Lake Group an opportunity to comment on this proposed subdivision, about which we have several concerns.

- This location, not only close to the shore of Clear Lake but to all intents nearly surrounded by the lake, makes the safe disposal of sewage vital. If there were any reasonable prospect of public sewer service being extended to the Buckingham peninsula in the foreseeable future we would argue that all residential development in the area should be delayed until modern connections are available. Since unfortunately this best solution is not likely to come about any time soon, we believe that prudence demands that engineered septic systems be required for this project, and for any new construction in Buckingham.
- Before servicing this development by private well water, we would recommend that the developers try to work with the Buckingham homeowners association to make the improvements needed to lift the current moratorium on new connections. If groundwater proves to be the only feasible alternative, we very strongly urge that a thorough hydrological study be conducted as a precondition to any approvals.
- According to your letter of August 7, at least one archeological site is known to be in the vicinity: we would therefore recommend an archeological evaluation of the entire site by a competent professional, and consultation with neighboring tribes – none of whom seem to have been included in this request for review, which is disquieting.
- Although comparatively few mature trees seem to exist on this property, it has been an undeveloped meadowland for many years, and could potentially support a number of common and uncommon species of plants and animals. A thorough biological evaluation of the site should be undertaken, and appropriate mitigations for the habitat loss that will inevitably follow development devised. The effects of development of this site on the adjacent natural woodland at the very tip of the peninsula should certainly be included in this evaluation.

- Traffic impacts, while probably comparatively minor, are certain to occur, and will be magnified by the project's location at the end of the peninsula. Analysis and appropriate mitigation is needed.
- Although we have no objections to the requested variance to the normal maximum 1/3 width/length ratio, the long peninsular driveway accessing lot 1 does seem less than desirable, and we would suggest that the lot lines be redrawn to permit a more compact shape.
- The proposed subdivision is evidently sited on only a portion of the parcel: according to a recent article in the Lake County Record-Bee, a vineyard is to be developed on the remainder, thus preserving rather more than half the property as open space. This sounds like the sort of proposal that we would ordinarily be eager to support, at least in principle, but no plans of this sort – or of any sort – for the remainder parcel are detailed in this proposal, and we very strongly contend that they must be evaluated in order for a valid assessment of the residential subdivision. What steps are proposed to prevent conflict between agricultural and residential uses in such close proximity? Does the applicant intend to place an agricultural or conservation easement on the remainder parcel? If not, what is going to prevent that segment from being subdivided at some later date? CEQA guidelines require that the likely environmental impacts of development be assessed as a whole, not in bits and pieces, and leaving the remainder parcel out of the current equation would seem to violate that standard.

This is a small subdivision, but given the sensitivity of the site and the number of unresolved questions regarding its development, we would recommend the preparation of an Environmental Impact Report.

Yours sincerely,

A handwritten signature in black ink that reads "Victoria Brandon". The script is cursive and somewhat fluid.

Victoria Brandon

Chair, Sierra Club Lake Group