

# Sierra Club Lake Group

15995 Lucy Circle, Lower Lake, CA 95457

December 5, 2005  
Penelope Shibley, Senior Planner  
Community Development, Planning Division  
255 N. Forbes St.  
Lakeport, CA 95453

RE: Paradise Valley Ranch

Dear Ms. Shibley:

Although we favor many aspects of this proposal (sensitivity to the terrain, preservation of natural open space, preservation of an additional substantial area for possible common agricultural use, equestrian facilities), several disquieting questions remain.

First, what legal status is proposed for the common areas, and what access provisions? Common areas E & K concern us particularly, since these contain substantial wildlife habitat and have great scenic value. We strongly recommend that the developers be required to place these parcels under a permanent conservation easement to guarantee the continuation of their natural state.

Vehicular access should not be allowed in the natural areas; if any existing OHV tracks cross the property barriers should be created and these ugly, erosion-creating scars revegetated. We are somewhat concerned about the track leading up to the possible future agricultural area on the western border of the property, which looks like it could be an invitation for OHV access and possibly for illegal dumping -- activities which plague all of Lake County, and are particularly pernicious on the North Shore.

Second, we think the proliferation of private water companies should be avoided if possible. We recommend that the developers explore the possibility of connecting with existing services at Paradise Cove or Kono Tayee, and demonstrate the unfeasibility of that option before striking out on their own.

Third, this brief application makes no mention of archeological sites or other cultural resources which may be present. If a qualified archeologist has not yet surveyed the property (particularly the low-lying areas where the houses will be clustered, and central Common Area A), we recommend that this be done immediately; if any significant cultural resources are identified proposals to avoid them or otherwise mitigate damage should be incorporated into the application.

Fourth, the same requirement should apply to biological resources: we recommend

that the developers be required to submit a professional survey of the site's existing vegetation and resident birds and other wildlife, accompanied by proposals for appropriate mitigation measures if needed.

Fifth, this subdivision is large enough to impact Highway 20 traffic significantly. CalTrans and the Department of Public Works will undoubtedly propose measures to alleviate any ill effects, and compliance with their recommendations should be a precondition of development.

If the above recommendations are followed we would recommend either a Negative Declaration or a Mitigated Negative Declaration (depending on the results of the archeological and biological surveys); otherwise an Environmental Impact Report should be prepared.

Yours sincerely,

Victoria Brandon

Sierra Club Lake Group Chair