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2/28/06

TO: Emily Minton
RE: Plum Flat Subdivision; SD 06-02, APN# 009-006-30

Dear Ms. Minton,

I have spent a great deal of time on planning issues through my volunteer involvement as a member of the Rivas Area Plan and the Lake County General Plan Update Citizen's Advisory Committee. I have expressed concerns both verbally and in writing about including large tracts of undeveloped land currently zoned as Rural Lands into the Clear Lake Riviera Urban Development area. Parcel 009-006-30 (102 acres), the site of the Plum Flat subdivision, as well as parcels 009-006-03 (62 acres), and 009-006-88 (112 acres) should not be included in the Clear Lake Riviera Urban Development area because these parcels lack basic infrastructure. These parcels do not meet the criteria laid out in the proposed General Plan for urban development. The proposed General Plan states ***"Urban development areas are generally characterized by moderate and higher density residential development, community oriented commercial development and the availability of public services required for that development, specifically central water and sewer, an extensive road network, public transit and other such services. Development not providing such services may be "non-urban" or "rural" "*** (Page 3-2, Lake County General Plan Goals and Policy Report). These parcels lack water, adequate roads and other services. The main feeder route for traffic generated from the development of these parcels would be Point Lakeview Road, a narrow two-lane road, which is already impacted from the explosive growth in the Clear Lake Riviera subdivision. All of these parcels are currently zoned Rural Lands, which is a much more appropriate zoning given the lack of available infrastructure.

Traffic from the Plum Flat subdivision would impact Point Lakeview Road. Traffic would also impact Soda Bay Road and the intersection of Soda Bay and Highway 29. The intersection with Highway 29 is already impacted and turning onto the highway is more difficult each day as traffic increases. A traffic study should be required to address these impacts.

Water may be a major issue in the Plum Flat subdivision. This project should not be approved until an adequate water supply is established. The developer alludes to the Mulvaney Vineyard's hydro-geologic assessment and "conversations" with local folks as proof that good well water will not be difficult to obtain. I urge the developers to read the Mulvaney Vineyard hydro-geologic assessment, which states ***"It is considered hydro geologically feasible, though risky, to drill and construct one or more water wells on the subject property in an attempt to extract the rates of groundwater required to meet the irrigation-supply requirements of the proposed vineyards. Principle problems associated with the development of onsite groundwater resources include: the possibility of the well site not intersecting a sufficient number of laterally extensive water-bearing fractured volcanic rocks at depth; and the unknown nature and extent of existing and probable faults on or near the property."*** I noticed that few if any fault lines traverse the Plum Flat parcel and the lack of water bearing faults may be a problem since water in this area is usually associated with highly fractured volcanic formations within fault zones.

The developer is proposing 182 residential lots on 100 acres. This density is too high for the proposed Suburban Residential Reserve zoning, which has a one-acre minimum per residence. As proposed the development does not meet the 35% open space requirement of "PDR" Planned Development Residential. The subdivision needs to reduce the number of lots and increase the area allocated to open space.

Currently the Clear Lake Riviera has a 300-foot buffer zone with the Mulvaney Vineyard. This buffer zone exists to lessen land use conflicts between high-density residential areas and agricultural lands. The buffer zone also provides some protection from off site drift of agricultural chemicals such as sulfur, which is routinely used on grapes. The lots on the southern boundary of the Plum Flat subdivision abut vineyard lands. The developer should provide a 300-foot buffer zone between homes and the vineyard site. The 300-foot buffer zone would also provide a wildlife corridor and with the proper planning could eventually connect with the existing 300-foot buffer zone on the Mulvaney Vineyard. This would create a true wildlife corridor between urban and agricultural development in the area.

There is a good possibility that *Konocti manzanita*, may exist on the site. The *Konocti manzanita* is a 1B plant, which is protected under CEQA Section 15380 for rare and sensitive species. The *Konocti manzanita* was documented by the Department of Fish and Game on the adjacent Mulvaney Vineyard site. The area is also home to many species of wildlife including mountain lions. Local wildlife is being squeezed into this area by residential development in the Clear Lake Riviera subdivision and vineyard development to the south of the neighborhood. Protecting the integrity of the chaparral habitat will be important to the survival of local wildlife.

The developer states that only 200 lots are available for building within the Clear Lake Riviera and that demand is exceeding the supply of building lots. Currently the Clear Lake Riviera has 1,344 available lots. The proposed General Plan encourages infill development where existing infrastructure already exists. The Clear Lake Riviera is serviced by the Mount Konocti Mutual Water Company, the best-run water system on the lake and the roads are in place. It is only logical to meet demand for housing by building out this existing subdivision. If the County insists on including the Plum Flat parcel in the Clear Lake Riviera Urban Development Area then it should not be included until the build out of the Clear Lake Riviera subdivision.

I noticed that the developer has lots on the parcel map that are actually on the adjoining parcel (APN#009-006-03). Is this adjoining parcel also part of the development? If so then that needs to be reflected in the proposal.

On a positive note, the developer's proposal to provide hiking trails throughout the community is progressive and certainly reflects an understanding of integrating nature into neighborhoods. The proposed parks and wildlife area also commendable, but must be expanded in order to meet the 35% open space requirement.

Thank you for considering my comments on this proposal.

Sincerely,

Angela Siegel
