

Sierra Club Lake Group

PO Box 1011 Kelseyville, CA 95451

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Kevin M. Ingram, Assistant Planner
Planning Division
Community Development Department
255 N. Forbes St
Lakeport, CA 95457

RE: Robin Hill Shores, SD 06-09; IS 06-21; RZ 06-05; GPD 06-03

Dear Mr. Ingram:

Thank you for the opportunity to comment on this proposed subdivision. Although it contains many desirable elements (preservation of substantial areas of common open space, provision for pedestrian and other non-automotive access, expressed sensitivity towards oak tree preservation), a number of issues concern us nonetheless.

Traffic. The traffic generated by this project alone will seriously impact the secondary roads now serving the neighborhood, and have a noticeable effect on Lakeshore Drive, Highway 29, and other major routes, as well as downtown Lakeport and Upper Lake. When the cumulative impacts of the additional developments projected for the immediate vicinity are considered, it is obvious that major upgrades will be required, and that even with those upgrades the effect of the increased noise and inconvenience upon the project's neighbors will be considerable. Detailed professional analysis and mitigation proposals are essential.

Biological Resources. Despite laudable intentions to avoid and mitigate impacts upon the oak woodlands contained upon the site, without specific vegetation maps it is impossible to judge the extent to which these intentions correspond to reality. The proposed program of compensatory replanting appears to be very generous, with a four to one ratio, but CEQA mitigation standards relate to preservation of habitat rather than trees, and replanting alone cannot be considered adequate mitigation. Current "Resource Conservation" designation indicates the importance of the oak woodlands on this site, and unless it is clustered in the area to be preserved by a conservation easement, that habitat—once abundant but now in severe decline—will inevitably be degraded by fragmentation no matter how cleverly individual trees might be avoided. Furthermore, the materials provided give no indication whether the woodland analysis and mitigation plans have been prepared by a Registered Professional Forester, as is required by law. A letter of January 9, 2006 from the Board of Forestry to Board of Supervisors Chair Anthony Farrington makes this requirement abundantly clear; an online link to this letter can be accessed from www.lakelive.org/provinsalia in the event that you are not familiar with it.

Loss of wetland and shoreline habitat also concerns us. These resources have become vanishingly scarce on Clear Lake, and drastic measures are warranted to preserve the little that remains. If marina facilities are to be included in this subdivision at all (and we question that necessity) their impact on the natural shoreline could be much reduced by concentrating all the moorings in one location with one access pier, rather than adding three subsidiary piers as indicated in the plan.

Infrastructure. The proposal to supply the development with public water and sanitation facilities is laudable, but does the capacity to provide these services exist? If extensive upgrades will be necessary, who will pay for them?

Cultural Resources. Without seeing the survey that has been submitted with the application, it is impossible to judge the possible impacts of development on this site.

Esthetics. Evidently the entire site slopes towards the shore of Clear Lake, with steep bluffs along the northern portion of the shoreline. Intensive development will have significant visual impacts from the viewpoint of the Lake itself, probably from Rodman Slough as well, and possibly even from the opposite shore.

The potential environmental effects of this project are momentous. We strongly recommend that it not be allowed to proceed before all possible impacts, including but not limited to those mentioned above, are subjected to the detailed analysis that nothing but a full Environmental Impact Report can provide.

Yours sincerely,

Victoria Brandon

Chair, Sierra Club Lake Group