

Sierra Club Lake Group

PO Box 1011 Kelseyville, CA 95451

March 15, 2006

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

RE: Robin Hill Terraces: SD 06-08, IS 06-20. GPD 06-02

Dear Mr. Ingram:

Thank you for the opportunity to comment on this proposed subdivision, which arouses our concern for a number of reasons.

Traffic. The traffic generated by 250 residences 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 proposed projects in the immediate vicinity are considered, it is obvious that major improvements to a number of roadways will be required, and that in any case increased noise and inconvenience will inevitably affect nearby residents, and may have adverse consequences for Rodman Slough.

Biological Resources. Despite laudable expressed intentions to avoid impacts upon the oak woodlands contained upon the site and to mitigate when avoidance is impossible, without specific vegetation maps it is impossible to judge the extent to which these intentions correspond to reality. The four to one ratio proposed for compensatory replanting appears to be very generous, but CEQA requirements relate to *woodland habitat* rather than *individual trees*, and replanting alone cannot be considered adequate mitigation for habitat loss. Current "Resource Conservation" designation indicates that the oak woodlands are significant and valuable; unless the woodlands happen to be concentrated on the steep slopes proposed as open space (which seems most unlikely), the habitat they represent will inevitably be degraded by fragmentation no matter how cleverly individual trees might be avoided. Furthermore, the materials provided do not indicate 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 on line link to this letter can be accessed from www.lakelive.org/provinsalia

Open Space. Approximately 35 percent of the site has been designated as open space, but on closer examination it seems that this apparently generous allotment was selected for reasons of topographic convenience rather than public amenity. The actual building lots are crowded closely together on comparatively flat terrain, with no park lands,

pedestrian pathways, or habitat linkages to the open areas in the adjacent proposed Robin Hill Shores subdivision. The value of designating a ribbon of steeply sloping "open space" on the north and west edges of the project seems minimal, especially since, according to the information submitted, no conservation easement is proposed.

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. A cultural resources survey was submitted with the application for development of the adjacent Robin Hill Shores property, but not for Robin Hill Terraces. Without that information it is impossible to judge the full impact of development, or what mitigations might be needed..

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

We strongly recommend that this proposal not be allowed to proceed before all potential environmental effects, 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,

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

Victoria Brandon

Chair, Sierra Club Lake Group