

Sierra Club Lake Group

15995 Lucy Circle, Lower Lake, CA 95457

February 27, 2006

Matthew Joseph, Asst Planner
Planning Division
Community Development Department
255 N. Forbes St
Lakeport, CA

RE: SD 06-06, Williams Subdivision (8999 Miwok Way, Kelseyville)

Dear Mr. Joseph:

The Sierra Club Lake Group appreciates the opportunity to comment on this application, which arouses our concern for several reasons.

- (1) It would require a rezone under the existing antiquated General Plan, and falls outside the proposed Clear Lake Riviera urban development zone in the new plan. For that reason alone we recommend that the application be rejected forthwith.
- (2) The proposed parcel size of approximately one acre is a prescription for sprawl: neither urban nor rural, demanding disproportionate investment in infrastructure per parcel, and necessitating on site sewage treatment. Furthermore the proposed community water system would of necessity draw on groundwater sources which are imperfectly understood and by no means limitless.
- (3) Project location on a steep slope above existing houses would create negative esthetic impacts, not only in the immediate vicinity but from as far away as the opposite shore of Clear Lake. The massive grading required by construction on such terrain has the potential to cause serious erosion and other destructive effects disfiguring to Mt Konocti, which is one of the crown jewels of Lake County.
- (4) The application contains no information about biological, hydrological, or cultural resources on the property, and no reasoned judgement about the advisability of development of the site can be made without this data.
- (5) Nearly 40 acres out of the 53 acre parcel is to be left as a "remainder," without any explicit plans for its ultimate disposition. Since no conservation easement is mentioned, one can only suppose that if the present application is accepted eventually the "remainder" would in turn be proposed for residential development, thereby magnifying the adverse environmental effects of the original proposal.

If for some reason the application is allowed to proceed we urge most strenuously that an Environmental Impact Report be required, with full examination the consequences of development as specified under CEQA, including effects on the "remainder parcel" and adjacent properties under other ownership. We also recommend that the applicant be advised, before undertaking the very considerable expense of an EIR, about the improbability of ultimate approval when a project does not comply with basic planning guidelines.

Yours sincerely,

Victoria Brandon
Chair, Sierra Club Lake Group