

From: Redbud Audubon Society, Inc.
13806 Cliff Drive
Lower Lake, CA 95457

Re: Comments on Provinsalia Draft EIR

To: Rose Marie Moore
RMM Environmental Planning
3010 Beacon Blvd.
West Sacramento, CA 95691

As conservation chair for the Redbud Audubon Society, Inc. a local branch of the National Audubon Society, I am submitting comments regarding the draft EIR for the Provinsalia project.

My first comment is in regards to the “Alternatives to the Project” section. Under the “Owners Right to Build,” assertion, it should be noted that environmental restraints would still govern the development of this property. Why the consultants assert that this alternative would result in even more development is hard to understand. It is almost like blackmail by the developer. In other words - “either you approve our specific plan, or we will just go ahead without one and build an even bigger development.” The City is not obligated to allow extensive development of this site. The owners may have a right to build their own home, but not 900 homes.

When talking about alternative 3, reduced density, again, elimination of about 400 homes would make more sense. Clustered high end homes, with extensive areas of natural woodlands could still make this project financially viable for the developer and have far less impact on this site. I would steer the developers and the consultants to the following website:
www.brandywineconservancy.org. This is a land trust that specializes in providing information about Conservation Design of subdivisions. There is much information available about this idea and we suggest that the City of Clearlake, the consultants, and the developers become educated on this concept. I would be happy to provide more information and contacts on this idea as well.

Another comment concerning the development in general, is that it does not fit the criteria, as established by the Environmental Protection Agency for Smart Growth. Again, visit www.epa.gov/smartgrowth for information.

5.1 Aesthetics

This section speaks for itself. The unavoidable impact resulting in a “sense of loss of a unique resource,” could be mitigated with reduced density and Conservation Design.

5.3 Biological Resources

We question the viability of “restoring oak woodlands” to make up for the loss of the 1500 trees that will be removed. Also, does the plan take into account the trees that will be removed on individual lots when the houses are built? This needs to be addressed. Also, oak trees are

notoriously hard to establish and grow, plus, they take decades to mature and replace the habita that will be lost. If true conservation is the goal, we suggest coming up with a Conservation Design for this development that really minimizes the impact.

Loss of bird habitat cannot be mitigated by replanting oak trees that will not be mature for decades. Grasslands that host the prey for raptors in this area, including Golden Eagles, will be gone. These losses cannot be reduced to less than significant since the food sources for raptors will be removed.

5.12 Traffic and circulation

As a resident of the Lower Lake area, the traffic concerns loom large. The presence of two schools on Lake Street makes the additional traffic that will be utilizing this road an important issue. Also, traffic traveling through the small town of Lower Lake would be a huge impact, especially a full “build out.”

Conclusion

The Redbud Audubon Society suggests that preparers of the draft EIR for Provinsalia go back to the drawing boards and come up with some other “Alternatives to the Project.” One of these alternatives could be a reduced density subdivision based on Conservation Design. This proposal could prove a good alternative for the developer and ease the concerns of the residents and citizens of this area.

We would appreciate a consideration and a response to these concerns and suggestions.

Sincerely,

Roberta Lyons,
Conservation Chair, Redbud Audubon Society, Inc.