

Prior to preparation of this Draft Environmental Impact Report (DEIR) citizens, public agencies, public utilities, civic, education and other community groups provided comment on elements they felt were important and should be addressed in this document.

In spite of the fact that many of their concerns either challenged the Notice of Preparation and/or Environmental Checklist's validity with regard to accuracy or completeness or missing elements they were not judged by the lead agency to merit inclusion in the DEIR. *The following is a list of those elements raised and not addressed:*

Provinsalia will conflict with agricultural spraying by nearby vineyard. Residents of this project will most certainly create issues with spraying, noise and nighttime operations.

An Agricultural Preserve Zone parcel to the north needs to have impacts addressed that could threaten its ability to continue to operate as agriculture. Discussion of water storage reservoirs fails to identify location or address potential risk to wildlife when polluted water is available for wildlife to drink and swim in.

Provinsalia fails to recognize that senior citizens live a stones throw away and need to be included in considerations about air pollution

How can displaced wildlife establish themselves in areas that are to be "public open space" some of it with slopes over 40%, which include trails, bike paths roads...

A decent standard of protection for elderberry beetles requires that not only the brushes but a significant area of vegetation surrounding them be maintained in its natural condition.

Property across Cache Creek (232 acres), in Lake County jurisdiction, was originally included in this proposal and then removed. A "piecemeal" approach will occur unless planning addresses the manner and intensity of development of this property.

The information provided fails to acknowledge the impact of traffic on Middletown and Highway 29 over St Helena then on to Santa Rosa. This is not a trivial impact it is *major*. If the EIR is to "take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct", then it will fail unless it include these areas in the traffic and transportation evaluation.

Primary access should be from 18<sup>th</sup> Avenue. Cost considerations should not be an excuse for failure to provide proper access. Dam Road and Lake Street will become major thoroughfare if 18<sup>th</sup> Ave is not opened up.

Removal of 1500 oak trees and replacement elsewhere requires scientific evidence that such plantings represent viable oak woodland habitat mitigation ESI resource study revealed presence of bobcats, mountain lions, deer and bears. This demonstrates the site is an important component of a larger wild land ecosystem ( greater than 12,000 acres). Impacts to these species need to

be addressed.

Who will pay for Dam Road widening that includes buying or condemning neighboring properties to acquire the width required. Is the city to share costs? How will the project provide housing for persons and families of all incomes? CEQA sets forth minimum guidelines necessary for adequate analysis of cumulative impacts: (1) a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, (2) a summary of the expected environmental effects to be produced by those projects,,,,, and (3) a reasonable analysis of the cumulative impacts of the relevant projects. (Guidelines 15130, subds. (b)(2),(3). Notably, it is wrong as a matter of law and fact to conclude that cumulative impacts are addressed by maximizing mitigation measures for the project at hand.

The lead agency shall consider both primary and secondary effects which may be several steps removed from the project itself. For example, an expanded sewer treatment plant or roads may facilitate population growth and lead to increased air pollution. Growth inducing impacts to adjacent parcels should be analyzed.

Plan destroys connectivity of the north-south wildlife corridor linking oak woodlands to Cache Creek. Planting oaks on eastside of the project to ameliorate this impact may serve aesthetic purposes, but the proposal is biologically and economically pointless.

Phase map shows extensive ridge top development which will impact view sheds. In light of the fact that a Federal Wilderness area will directly overlook Provinsalia its presence in the view shed and noise shed could substantially degrade the wilderness character of our wild heritage.

Propane tanker trucks and high risk of wild land fire make it clear Dam Road cannot service this project. In the worst case scenario this project could become a fiery death trap. A token effort to build a minimal road to 18<sup>th</sup> Avenue for fire trucks and evacuation does not mitigate the real threat.

The rezone and General Plan amendment proposed does not eliminate any conflict with Clearlake's applicable land use plan. Revisions should only be implemented if they promote the general good of the community. Not because it will be profitable to an individual developer.

Noise and lights Lake Street are not mitigated even though it will be the commuter route to Santa Rosa.

Justify the statement that Provinsalia is "the project site at the eastern periphery of the city, and constitutes a logical extension of urban density and land use" given the fact that this a remote wilderness a mile away from city services California Regional Water Quality Control Board with respect to wetlands guideline one is Avoidance (Is the project the least environmentally damaging *practicable* alternative?)

Air Quality Management District recommends that all roads be completed prior to occupancy of any residential units. We recommend that construction be phased from occupied units by already grading/leveling prior to nearby home occupancy.

Dam Road will be a bottleneck creating significant delays and exposure of residences to vehicle exhaust.. Alternative access roads need to be developed. This project may result in exposure of residences to agricultural odors, chemicals and dust since it leap frogs over undeveloped lands currently used for pasture/ grazing land.

Project does not address scenic vista from waters of Cache Creek.