

October 22, 2007

Janet Palma, AICP - Assistant Project Manager
PMC
1440 Broadway, Suite 1008
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Email: planner@clearlake.ca.us

RE: Provinsalia Draft Environmental Impact Report, September 2007

Dear Ms. Palma:

Tuleyome works to protect both our wild heritage and our agricultural heritage in the Putah and Cache Creek watersheds for existing and future generations. We appreciate the opportunity to comment on the Provinsalia Draft Environmental Impact Report and request that these comments be included in the formal record and that they be addressed in preparation a recycled draft EIR and in the final EIR. We also request that Tuleyome be noticed with respect to all further actions with respect to this proposed subdivision.

In general, we find that this EIR lacks in details necessary for adequate review and as such request that when all comments are addressed it be recirculated as a draft. EIR.

We have reviewed several comments letters that have been submitted on this draft and by reference wish to incorporate the comments of the Sierra Club Lake Group (10/16/07), the California Oak Foundation (10/17/07), and Dr. John Parker (10/18/07).

In analyzing this DEIS we are particularly concerned that there be no negative impacts to the Yolo County Flood Control and Water Conservation District system that supplies water vital to agricultural; and to the Cache Creek Wilderness and the Cache Creek State Wild and Scenic River.

We make the following specific comments:

Climate Change and Energy: Analysis of climate change and energy must be addressed. This subdivision represents leap frog sprawl at its worst. All residents will need to drive to reach all destinations. There is no opportunity for alternative transit and there is no jobs-housing match or balance. This is planning for the past and not the future. There must be a detailed plan to mitigate for increased energy use and emissions that impact on climate change. The City of Clearlake will be better served by higher density, compact development that is infill or located close to the city; which facilitates alternative transit, has a jobs housing match and is inclusive in housing types meeting the needs of all city residents. To help in mitigating these impacts any project should include mandatory solar PV and hot water systems.

Water Quality: Cache Creek becomes a California Wild and Scenic River ¼ mile below the Clear Lake Dam. In addition, Clear Lake and Cache Creek have TMDL's for Mercury and Clear Lake has a TMDL for Phosphorus. Nutrients cause algal blooms and reduce water quality in Cache Creek. The EIR must include a detailed storm water study to prevent runoff from the proposed project both during and following construction. Because of the sensitive location of this proposed project adjacent to Cache Creek and the importance of this waterway for agricultural, municipal use and as this is a state wild and scenic river- all untreated runoff must be prevented. Mitigation measures must spell this plan out in detailed. It is inadequate to merely state that BMP's will be used. Best management practices must include storage ponds to store and treat all runoff up to a minimum 100 year event. Runoff must be treated to control sediment, pesticides and other storm water components to protect Cache Creek water quality. In addition, because of the fertilizer and pesticide use on golf courses there should be no runoff from the golf course to Cache Creek. Mitigations requiring water recycling and ponds for runoff evaporation must be included in the EIR

Water Quantity: The current water supply system for the Cache Creek drainage is under serious pressure. While we cannot predict specific climate changes within our region it is not unreasonable to assume that we may have increased dry periods. As such all new construction must focus on water conservation. This must include building practices that minimize water use and restrictions on yard plantings to minimize water use. These should be listed in detailed mitigation measures. In addition, a golf course that uses large amounts of water should not be included in this proposed project.

Biological Resources: We would like to reiterate our support for comments of the Sierra Club Lake Group and the California Oak Foundation.

Conclusion:

While the DIER is incomplete it is clear that this project will have significant unmitigated impacts on both our wild heritage and our agricultural heritage and it is leap frog sprawl development at its worst. Alternative 1, the No Project Alternative, is clearly the only choice for this ill conceived, developer driven project. We encourage the City of Clear Lake to select this alternative.

Sincerely,

Bob Schneider, President
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