

Howell Karabel

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21112 & 21096 State Highway 175
Middletown, CA 95461

Dear Board Supervisors,

With all due respect to the Board of Supervisors, to the applicant, and to the project at the MAHA Guenoc property which I have no issue with, **I have grave concerns regarding the 12.75-acre site located at 21000 Santa Clara in Middletown (APN 014-380-09) portion of this Combined Major Use Permit.**

As a long-time owner and resident of a property on 175 and Park Ave, I have reviewed the project EIR. I note that analysis of the Santa Clara property is extremely limited.

I contend that this project should be considered separately with its own EIR. It will have a tremendous impact on nearby residents in many ways, and the town as a whole particularly due to traffic.

Flood, Drainage Soil:

1. This property is located in a flood plain. The water drains from south to north through all local current residents' properties. If land is raised and/or soil is imported, the properties on the southern border will flood.

I did not see anything in the EIR to mitigate these impacts to existing residents. A catch basin or storm drains at the very least need to be installed.

2. In the 90's an unknown entity illegally dumped hundreds of dump truck loads of concrete, asphalt, metals and soil mix onto that property. Soil testing is critical and toxic cleanup may be necessary. Is the applicant aware of any of this?

In 2018, I made an offer on this property for \$335,000. I requested dual participation in the soil analysis, knowing about the dump mentioned above. The cost would have been approximately \$20,000. This request was denied, which leads me to believe that the owners knew there were issues and did not disclose these to the MAHA developers.**

3. Has a current traffic study been conducted? The intersections of 175 and Santa Clara, and Park Avenue and 175 have not been adequately addressed and will have large impacts on traffic to and from town.

4. How will the proposed new 2 lane road impact residents? Will buses be traveling on the road planned for development 24 hrs/per day?

5. The number of duplex and single family housing proposed (21 single family residences with optional accessory dwelling units, 29 duplex units in 15 structures, and a community clubhouse and associated infrastructure) is not consistent with the original subdivision plan and permit for 50 single family homes, which expired in 2015.

6. What kind of lighting will be installed at the Santa Clara site. How will this affect our dark skies which we so appreciate, and that Lake County has the honor to be certified for?

7. The workforce housing has not been identified as long-term or temporary construction, low income or general use rental housing. Is the workforce housing part of the workers' compensation?

8 Does Santa Clara housing project actually adhere to the Middletown Area Plan? It has not been considered separately in detail, and it should be brought before the community as an independent project located in Middletown, without the distraction and glamor of the MAHA project as a whole. They are in different locations, with different purposes and impacts.

In **summary:** The original permit for a subdivision has expired, and any new permit should mandate an EIR, review, consideration, community input and permit specific to this site, soil, flood, drainage, lighting noise and traffic impacts, both on existing residents and on traffic in and out of town.

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