Center for Biological Diversity Comments to Lake County Board of Supervisors

July 7, 2020

## SPOKEN TESTIMONY

Good Morning Chairman Simon and Members of the Board.

My name is Ross Middlemiss with the Center for Biological Diversity, a non-profit conservation organization. The Center submitted extensive comments on the Draft EIR for this Project in April. We have been surprised and dismayed at the haste with which the County has attempted to approve this Project. We repeatedly asked for the County to give members of the public the time they needed to review the changes and new information in the FEIR and new planning documents that were never made available for public review with the Draft EIR.

While the decision to continue today's hearing will address these concerns in part, it demonstrates the Project's rushed and incomplete analytical approach thus far. This process has repeatedly forced the public to make what the County referenced as "11<sup>th</sup> hour" interventions; yet the County and applicant have made hasty amendments attempting to address the problems without adequate review.

The Center remains deeply concerned about the significant environmental impacts from this project, including impacts to biological resources, water quality, Greenhouse Gas emissions, water supply, wildfire and public safety.

The Project will have a devastating effect on the habitat and wildlife on the Project site, including oak woodlands, riparian habitat and critical migration corridors.

The Project will also substantially increase car traffic and vehicle miles traveled in the County at a time when California needs to drastically *reduce* car travel in order to meet its statewide goals for Greenhouse Gas emission reductions.

Finally, the Project's low-density sprawl in a remote, wildfire-prone location poses a serious threat to the safety and well-being of people on the Project site and residents in the region of the Project. Dr. Thomas Cova, a preeminent expert on wildfire safety and evacuation in California reviewed the EIR and expressed his strong concerns about the Project, stating:

[T]he County did not perform a project-specific wildfire evacuation analysis. Even in the absence of such analysis, there is strong evidence that evacuation times could exceed lead times for the project, which could pose a serious threat to public safety. (Cova Report at 5.)

Lake County is still recovering from recent destructive wildfires that impacted residents, property and the environment. The county should not subject its communities to higher risks of more catastrophic wildfires in order to build high-end, luxury resort and residential accommodations to serve "high net-worth" individuals, the target clients of the applicant.

Given the unaddressed environmental concerns over the Project, noted today and in our FEIR comments

submitted 7/6/2020, and the danger it poses to public safety, the Center asks the Board to deny all Project approvals.

Thank you,

Psr Mithin

Ross Middlemiss Staff Attorney Center for Biological Diversity 1212 Broadway, Suite #800 Oakland, CA 94612 Tel: (510) 844-7100 rmiddlemiss@biologicaldiversity.org