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Sent by email

July 20, 2020

County of Lake Board of Supervisors  
Attn: Carol Huchingson, County Administrative Officer  
255 N. Forbes Street  
Lakeport, CA 95453  
Carol.huchingson@lakecountyca.gov

Re: Guenoc Valley Mixed-Use Planned Development Project Final Environmental Impact  
Report, SCH No. 2019049134

Dear Supervisors:

As a native Californian, I oppose the Guenoc Valley Mixed-Use Planned Development Project ("Project") on moral and financial grounds. The Project puts all forms of life at risk. Human lives will be at risk during a wildfire, as egress roads will be bottlenecked. Habitat for native plants and wildlife that evolved with them will be destroyed. The Project has no contingencies for the future financial burdens suffered by CalFire or victims of wildfire. I urge you to reject the FEIR and to abandon the Project.

As a student of Environmental Geology, I understand that as our population numbers grow, we continue to expand our footprint. We put more and more people in hazardous areas. Human sprawl is exactly the story of European immigration and migration across North America, disrupting Nature along the way. Audubon's 7-year study finds 2/3rds of North American bird species heading toward the brink of extinction due to human activities, loss of habitat and climate change.

The loss of species other than our own is a worldwide concern. We are at the tail end of the United Nations Decade on Biodiversity. Next year will be the start of the United Nations Decade on Habitat Restoration. At the base of entire food webs and ecosystems are native plants. Scientists tell us to plant *local* native plants. Because insects depend on plants they evolved with. And birds eat insects for protein. Further, to address climate change impacts to native biodiversity, the California Biodiversity Initiative aims to "preserve ecosystems at the regional scale, with sufficient linkages, buffers and refugia to provide a robust future for all native species in the face of climate change." I urge you to conserve open spaces by prohibiting development and by restoring and expanding native habitat. Because all species' lives matter.

In case you missed it, "WRA documented 26 special-status plant species within the Phase 1 Study Area during seasonally timed surveys conducted in 2017, 2018, and 2019, including one federal-listed species, one state-listed species, six CNPS Rank 1 species, and 18 CNPS Rank 4 species....and an additional 81 special-status plant species were determined to have at least

moderate potential to occur, primarily associated with serpentine habitats found throughout the Phase 1 Study Area.” And “fourteen special-status wildlife species were documented within or adjacent to the Phase 1 Study Area, including one State-Endangered species, one State-Candidate species, and several California Fully Protected species, in addition to other special-status species. An additional 21 special-status wildlife species were determined to have potential to occur.” (DEIR Appendices, BRA1, p. i). For Phase 2, “WRA documented 660 plant taxa and 130 wildlife species. Twenty-eight special-status plant species were observed, and an additional 80 special-status plant species were determined to have moderate to high potential to occur, primarily associated with serpentine and volcanic habitats found throughout the Phase 2 and Open Space areas. Fourteen special-status wildlife species were observed within the larger Guenoc Ranch and have potential to occur in the Phase 2 and Open Space areas. An additional 21 special-status wildlife species were determined to have potential to occur in one or more habitats within the Phase 2/Open Space Study Area.” (Ibid., BRA2, p. i. and pp. 57-58. WRA, Inc. biologists conducted biological surveys for Phases 1 and 2). These important DEIR findings were apparently omitted from the FEIR. Clearly, the proposed area is valuable habitat for special species and their interrelationships.

Speaking of soil, let’s not forget its microbiota, its life-giving properties and its relationship to native plants. The DEIR Appendices document refers to special-status and other plants with an affinity for serpentine and volcanic soils, which occur throughout the Project area. “Serpentine soils harbor unique native plant assemblages that are resistant to invasion by non-native species and often support numerous special-status plants that are restricted to serpentine soils....Volcanic soils on the property may provide a similarly unique edaphic, or soil, condition that supports an atypically high diversity of native plants, including many special-status species.” (DEIR Appendices, pp. 8-9). The FEIR fails to mention the significance of soils and their important relationships with plants, fungi and bacteria--some of which occur only in California and nowhere else in the world. Serpentine is our California State rock, and our special California soils deserve protection from development.

Further, as a member of the California Invasive Plant Council, I find that the FEIR does not address impacts of invasive plants and disease pathogens or the fact that nitrogen deposition favors invasive plants to the disadvantage of native plants. Invasive plants outcompete native plants, often creating monocultures that overtake large areas of California. Disease pathogens like phytophthora are a threat to California oaks in particular. Mud and soil even from nurseries can carry water molds. The FEIR fails to cover best management practices to ensure that people, equipment and vehicles do not carry or introduce invasive plants and disease pathogens.

One more thing is the impact of GHG emissions, or air quality, which is of particular importance to my family. “As shown in Table 3.7-3, GHG emissions would remain above acceptable levels after mitigation. This would be a significant and unavoidable impact,” as stated in the FEIR. However, it would be avoidable if you abandon the Project. The FEIR mentions wood burning fireplaces. Everytime someone in our vicinity lights one up, my family and I have a negative physical reaction and difficulty breathing. We have the same reaction to wildfire smoke and

barbecue smoke. MM 3.3-2 refers to air quality "Project Wide Measures" such as low-impact appliances and fixtures." However, this does not appear to be a strict requirement. EPA-certified fireplaces reduce emissions somewhat; 28-60% emissions still pollute the air. What's missing are common sense requirements for no wood burning fireplaces, no gas appliances, only electric barbecue appliances, and rooftop solar everywhere.

Regarding the use of groundwater, I see no analysis of the rate of withdrawal of groundwater versus the rate of rainfall replenishment to the water table. This can be considered a nearly-non-renewable natural resource where it cannot be replenished during our lifetimes. At any rate, it is inadequate to simply monitor the groundwater supply or subsidence, as the FEIR suggests. If the Project is to go forward, I suggest using graywater for flushing toilets. If great expense will be made for resort hotels and resort villas, then extra expense should be made to stop using drinking quality water for flushing toilets.

Lastly, I noticed that eight acres of purple needlegrass grassland lie in the Phase 1 development area. This is *Stipa pulchra*, our California State grass. California has already lost 99% of its native grasslands; it would be a shame to build over any remaining native grassland. Moreover, California is an internationally recognized biodiversity hotspot, meaning we are blessed with an abundance of native species, many of which we humans are responsible for bringing to the brink of extinction. No other state has a greater abundance of species. This biodiversity and their habitats are our natural heritage, deserving of our appreciation and protection. The intention of California Public Resource Code § 10331 is to prevent the conversion of rangeland, grazing land, and grassland to nonagricultural uses.

In conclusion, I urge you not to let the lure of human desires outweigh your sense of morality to protect our gifts from Nature as well as human lives. We've already done enough damage to the very environment that supports us with activities that overwhelm Nature's capacity to heal itself. Do the moral thing by rejecting the FEIR and abandoning the Project.

Sincerely,

/s/ Denise Louie

Ms. Denise Louie

Member, California Invasive Plant Council

Member, California Native Plant Society

Member, Center for Biological Diversity

Member, Golden Gate Audubon