

## Jocelyn Gonzalez-Thies

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**From:** Jocelyn Gonzalez-Thies  
**Sent:** Thursday, July 27, 2023 8:08 AM  
**To:** Jocelyn Gonzalez-Thies  
**Subject:** FW: CDP\_2021-0051 (AT&T)

Mendocino County  
JUL 27 2023  
Planning & Building Services

**From:** Jansen, Bente@Coastal <[bente.jansen@coastal.ca.gov](mailto:bente.jansen@coastal.ca.gov)>  
**Sent:** Wednesday, July 26, 2023 5:15 PM  
**To:** Julia Krog <[krogj@mendocinocounty.org](mailto:krogj@mendocinocounty.org)>  
**Cc:** tatiana.garcia <[tatiana.garcia@coastal.ca.gov](mailto:tatiana.garcia@coastal.ca.gov)>  
**Subject:** CDP\_2021-0051 (AT&T)

Good evening Julia,

Please see below for comments regarding the above referenced CDP.

1. Condition 10 of the staff report for CDP\_2021-0051 requires that the applicant (AT&T) relocate or place underground all AT&T poles, lines, and facilities that are located within Highly Scenic Areas on the south side of Navarro Ridge Road. It is premature for the County to permit either of these scenarios (relocation or undergrounding) through the language of Condition 10.
  - a. The staff report doesn't address whether the special status plants or wetlands identified in the project area would be affected by undergrounding or by relocation. More information is needed in order for the County to determine that neither the special status plants or wetlands would be significantly impacted by the project alternatives proposed in Condition 10. In relation to mapped biological and wetland resources, project alternatives should be evaluated, including but not limited to, directional boring, placement of utilities underground on the south side of Navarro Ridge Road, placement of utilities underground on the north side of Navarro Ridge Road, and relocation of all AT&T poles, lines and facilities to the north side of Navarro Ridge Road.
  - b. We recommend that the County change the language of Condition 10 of CDP\_2021-0051 so that the applicant will be required to apply for a new CDP within 180 days of the effective period of CDP\_2021-0051 to either place all AT&T facilities underground OR relocate all AT&T facilities to the north side of Navarro Ridge Road, whichever is the least environmentally damaging alternative. By requiring the applicant to submit a new CDP application for the proposed scenarios outlined in Condition 10, the County will be able to require biological studies for the north side of Navarro Ridge Road and will be able to determine the least environmentally damaging alternative. See below for suggested language:
    - i. "Within 180 days of the effective period of this Coastal Development Permit (CDP), the applicant shall submit a new CDP application for either (1) the relocation of all AT&T poles, lines, and facilities to the north side of Navarro Ridge Road; (2) the placement of all AT&T poles, lines, and facilities underground on the south side of Navarro Ridge road; or (3) the placement of all AT&T poles, lines, and facilities underground on the north side of Navarro Ridge road; whichever is determined to be the least environmentally damaging alternative."

Thank you for the opportunity to comment,  
Bente



**Bente Jansen** (*she/her*)

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