

May 31, 2019

STATE CLEARINGHOUSE

**From:** [Preston, Destiny@Coastal](mailto:Preston_Destiny@Coastal)  
**To:** [Comments, CEOA@SLC](mailto:Comments_CEOA@SLC); [OPR State Clearinghouse](mailto:OPR_State_Clearinghouse)  
**Cc:** [Kraemer, Melissa@Coastal](mailto:Kraemer_Melissa@Coastal)  
**Subject:** FW: RE: RTI Infrastructure, Inc. Manchester Subsea Cables Project (SCH#2019049159)  
**Date:** Friday, May 31, 2019 6:12:22 PM

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Hello,

Our office was unable to comment on the MND by the May 29, 2019 deadline. However, I reached out to the County of Mendocino to mention concerns that they could consider under their future coastal development permit. I felt it would be best to keep you informed of our concerns, some of which include the finding of "no impact," as they relate to the Land Use Planning Section of the MND. Please review the email below, specifically the highlighted portions, for more details related to our concerns with the analysis of impacts in the MND.

Thank you,  
Destiny

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**From:** Preston, Destiny@Coastal  
**Sent:** Friday, May 31, 2019 6:05 PM  
**To:** Julia Acker ([ackerj@co.mendocino.ca.us](mailto:ackerj@co.mendocino.ca.us)); '[ackerj@mendocinocounty.org](mailto:ackerj@mendocinocounty.org)'  
**Cc:** Harrington, Daniel@Wildlife  
**Subject:** RE: RE: RTI Infrastructure, Inc. Manchester Subsea Cables Project (SCH#2019049159)

Hello Julia,

On May 1, 2019, our office received a copy of the Mitigated Negative Declaration for the Manchester Subsea Cables Project. A portion of the project is within the Commission's retained jurisdiction (marine areas). Once the Commission receives a CDP application (which we expect soon), John Weber, an analyst based in our Ocean Resources unit in San Francisco, will be working on this project. It appears that the terrestrial components of the project lie within the County's delegated CDP jurisdiction. I assume the County has not yet received a CDP application, but if you'd like to coordinate with John, please let me know and I'd be happy to put you two in touch since the project spans both our jurisdictions. If the consolidated CDP approach is preferred by the applicant and County, we could consider that.

Did the County provide any comments on the MND? We weren't able to read the entire MND and associated attachments prior to the comment deadline on May 29, 2019. However, we wanted to share some preliminary thoughts on the project proposal, which the MND doesn't seem to address and which, if the County is processing a CDP for a portion of the project, you might consider in the forthcoming CDP application review.

My understanding is that the proposed development will encroach within 50. ft. of ESHA. The ESHA Memo focuses on the fact that most of this encroachment is along the Highway 1 right-of-way in an already disturbed area. However, the Cable Landing Parcel (CLP) appears to be undeveloped and consisting of ESHA. Also, the CLP is zoned Rangelands, and based on MND Figure 2-3 (Cable Landing Parcel), it appears that there may be some project elements (generator, tanks, trailer, pumps, etc.)

that would displace/convert rangeland to non-agricultural uses. We recommend that during the CDP review, consideration be given to how the proposed development on the CLP would be consistent with the LCP policies regarding protection of ESHA and the Rangeland resources, in order to avoid the potential conversion of resource lands and adverse impacts on ESHA. MND Section 3.12 (Land Use Planning) largely understates those potential impacts with the determination that there would be “no impact” as it relates to environmental impacts that are in “conflict with any land use plan, policy, or regulation, adopted for the purpose of avoiding or mitigating an environmental effect.”

Finally, page 4 of the ESHA Memo describes a County document titled “Wetlands Exception – Ditches Memorandum.” Would you be able to share that document with us? That would be much appreciated.

Thank you,  
Destiny

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**From:** Wildlife R1 Correspondence [mailto:R1Correspondence@wildlife.ca.gov]  
**Sent:** Wednesday, May 29, 2019 9:38 AM  
**To:** Comments, CEQA@SLC; Preston, Destiny@Coastal; ackerj@mendocinocounty.org; State Clearinghouse (state.clearinghouse@opr.ca.gov); Leppig, Gordon@Wildlife; Garrison, Jennifer@Wildlife; Harrington, Daniel@Wildlife; Mason, Dana@Wildlife; Aarreberg, Arn@Wildlife  
**Subject:** RE: RTI Infrastructure, Inc. Manchester Subsea Cables Project (SCH#2019049159)

Hello,

Please see attached.  
All distribution completed electronically.

Thank you,

Amanda Bartlett-Querio  
Office Technician- Correspondence  
Department of Fish and Wildlife  
(530) 225-2125