

Attachment 8

From: Redbud Audubon <redbud.audubon@gmail.com>

Sent: Tuesday, June 18, 2024 3:07 PM

To: Lake County Community Development <CDD@lakecountyca.gov>

Subject: [EXTERNAL] Comments for UP 24-03 Lake Forest Verizon Cell Tower

July 18, 2024

Redbud Audubon would like to submit the following comments for UP 24-03 Lake Forest Verizon Cell Tower.

The tower will be seen from the roadway and we could not find where the discussion of the Scenic Corridor designation setback was in the documentation provided.

Will the AT&T Tower have any negative effects with the Verizon tower so near?

Can you please send the mitigation measures?

Thank you,

Donna Mackiewicz

redbud.audubon@gmail.com

707-805-9410

P.O. Box 5780

Clearlake, CA 95422

www.redbudaudubon.org

From: [Steve Robin](#)
To: [Trish Turner](#)
Subject: [EXTERNAL] Fwd: Lake Forest Verizon Cell Tower – Public Comment Period
Date: Saturday, September 6, 2025 2:12:46 PM
Attachments: [image.png](#)

----- Forwarded message -----

From: Steve Robin <steve.robin.sfo@gmail.com>
Date: Sat, Sep 6, 2025 at 2:08 PM
Subject: Fwd: Lake Forest Verizon Cell Tower – Public Comment Period
To: <Trish.Turner@lakecounty.ca.gov>

I would like to see artificial pine tree branches attached to the tower to maintain the scenic nature of the area.



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From: ERTH - East Region Town Hall <donotreply@wordpress.com>
Date: Sat, Sep 6, 2025 at 8:10 AM
Subject: Lake Forest Verizon Cell Tower – Public Comment Period
To: <steve.robin.sfo@gmail.com>



October 2, 2025

RE: Lake Forest Verizon Tower, Major Use Permit PL-25-60 (UP 24-03/IS 24-03), located at 16200 E Hwy 20, Clearlake Oaks, CA 95423

Dear Community Development,

Thank you for the opportunity to respond.

Comparing the ATT project and the Verizon project we see the two files use very similar language and specifications.

1. Scenic Corridor & Aesthetic Impacts

The tower is proposed within a highly visible scenic corridor along Highway 20. Unlike the AT&T tower approved nearby, Verizon has not provided visual simulations or a scenic resource consistency analysis. CEQA requires a clear description of the environmental setting, yet the Initial Study does not adequately analyze how the structure will affect the landscape, viewsheds, or the scenic combining district.

2. Cumulative Effects – Noise, Lighting, Visual Clutter

This project cannot be considered in isolation. There are already multiple tall lattice towers along this stretch of Highway 20. Verizon acknowledges other towers on the same parcel but provides no cumulative analysis of the combined impacts of tower height, red-blinking aviation lights, nighttime illumination, or increased maintenance traffic. CEQA case law requires that such cumulative impacts be evaluated before project approval, not deferred.

3. Questionable Co-Location Claim

Verizon asserts that co-location on the existing adjacent tower is not feasible, yet AT&T's nearby 150-foot tower was explicitly designed to be co-locatable. This inconsistency demands scrutiny. The County should require Verizon to provide engineering substantiation—such as RF propagation maps, elevation profiles, and structural analyses—to demonstrate why co-location is infeasible. Absent this

evidence, the justification appears unsupported and inconsistent with County policy and CEQA's mandate to consider project alternatives. We found no discussion of FAA beacons, steady-burning vs. flashing lights, shielding, or maintenance-nightwork restrictions that typically reduce attraction/disorientation of migrating birds

4. Procedural and Tribal Consultation Gaps

The Initial Study does not clearly document government-to-government consultation with all requesting tribes, nor does it provide enforceable mitigation for potential cultural or biological resources. CEQA and AB 52 require these steps as part of a legally defensible review.

5. Biological Impacts

Initial Study 24-03 does not clearly document a Bald and Golden Eagle-specific plan in the project's biology files. The paperwork relies on general nesting-bird/raptor measures (pre-construction surveys, seasonal work windows, and buffers), but it doesn't include an Eagle Conservation Plan or BGEPA-specific protocol (e.g., eagle territory surveys or take-avoidance monitoring). specific survey protocol, territory mapping, or take-avoidance plan in the IS or listed attachments.

The Initial Study doesn't analyze avian collision risk (flight paths, nocturnal migration, weather/low-ceiling conditions) or tower lighting design relative to birds; the IS's Biological section focuses on construction-phase disturbance and nest avoidance rather than operational risks to migrants.

Improved coverage is important for public safety and service, but it cannot override CEQA's requirements for full and accurate disclosure of environmental impacts. While the County may be looking at the short-term benefit of coverage, it must also require a clear decommissioning and restoration plan with financial security. Without enforceable conditions, the community risks being left with industrial structures in a scenic corridor long after they have served their purpose. The red flags here—scenic resource degradation, avian collisions, Eagle conservation plan, cumulative lighting/noise impacts, and the unresolved question of co-location.

Thank you,

Redbud Audubon Society Board of Directors

To: Trish Turner, Community Development Department, 10/6/2025

Re: Proposed Lake Forest Verizon Cell Tower UP 24-03

As you are aware, the Eastern Region Town Hall is a municipal advisory committee appointed by the Board of Supervisors to seek relevant information, perform outreach, participate and make recommendations on issues affecting the residents of the East Region of District 3, which includes Clearlake Oaks.

Thank you for the opportunity to comment on the Lake Forest Verizon Cell Tower project, UP 24-03, proposed on parcel 010-020-29 at 16200 E. Hwy 20.

ERTH has the following comments and questions on the project documents.

Draft Initial Study/MND

Aesthetics

The project is zoned RL-SC – Rural Lands and Scenic Combining District. Pg 9 Aesthetics 1A of the Initial Study states, *"While the 150' tower site is in a mapped scenic corridor, the location of the tower is not within the boundary of the Scenic Combining overlay district."*

- According to Zoning Ordinance Section 34.3, cell towers are not a permitted use in SC. (Citation A). Additionally, the current Shoreline Area Plan discusses policies surrounding wireless communications and contains numerous references to the preservation of scenic corridors (Citation B)
- The concept of a Scenic Corridor setback in the Scenic Combining District has come up in several projects. In fact, the word "corridor" is not mentioned in Article 34. We have made several requests to CDD, but to-date, we have not received any document outlining this setback. We are requesting that CDD produce the County-approved Scenic Corridor Setback document, which would clarify our concern.
- Is there something that could be done to mitigate these concerns?

Wildfire Mitigations:

- We do not see any correspondence or review from the Northshore Fire Protection District – have they commented on the project?
- Section XX Wildfire (pg 37): Mitigation WILD-2 says *"prior to operation, the applicant shall improve the interior driveway to meet Public Resources Code 4290 and 4291 driveway standards."* Please clarify "prior to operation", should this be a requirement to be completed at the beginning of the project, not prior to operation?

- The fenced-in location is 30 feet by 30 feet and will be cleared of vegetation. Is there a proposed 100-foot defensible space setback as outlined in CA PRC § 4291?

Alternative Coverage Analysis

While an Alternative Coverage Analysis is required, the included report mentions a review of several sites. Only one is listed which is located in Erie, CO and some of the description refers to Highway 217 in Santa Barbara. The map showing the proposed cell tower site is a different location – shown across from Old Long Valley Rd. We would request to see the correct analysis.

Bio Assessment

Page 20: Reference to cannabis.

Site Simulation

None of the simulations show the current 150-foot AT&T lattice cell tower in relation to the proposed Verizon tower, which is located on the same parcel just 500 feet away.

ERTH supports the expansion of emergency services and cell phone coverage, but we feel the project needs more review and mitigations.

Thank you,

Maria Kann – Chair

Angela Amaral – Vice Chair

Holly Harris

Denise Loustalot

Citation A - Scenic Combining District Article 34

"34.3 Uses permitted: (a) Uses permitted in the base zoning district or any combining district **except** the following: (Ord. No. 1749, 7/7/1988)

10. Major Wireless Communication Facilities (Ord. No. 2594, 07/25/2002)"

Citation B - Current Shoreline Area Plan

- Issues (pg 2-18) - Overhead utility lines detract from the scenic view sheds in the planning area
- There is inadequate protection of scenic view sheds along scenic highways and roads. (pg 2-18)
- Scenic Corridors (pgs 3-47 to 49 and 5-65): The following routes in the County within the Shoreline
- Communities planning area have been identified as potential scenic highways:
- Highway 20 – the entire length through the County from the Mendocino County line on the west to the Colusa County line on the east. The entire route of the highway within the planning area is a potential scenic highway. Highway 20 to the east provides the eastern entrance to the county.
- Highway 53 – from the intersection with Highway 20 to the intersection with Highway 29 at Lower Lake. Views of Clear Lake with Mt. Konocti in the distance and rugged landforms near Highway 20 make this an enjoyable drive.
- General Plan policies encourage the protection and enhancement of Lake County's scenic highways and resources. The major purpose of this objective is to promote the county's recreation-based economy and provide a high level of scenic quality to residents and visitors alike. State Highway 20 are designated "SC", Scenic to protect their scenic qualities.
- Objective 3.4.4 (pg 3-53) Protect and enhance the recreation-based economy in the Shoreline Communities Planning Area by preserving scenic resources.