

LOCAL AGENCY FORMATION COMMISSION
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KATE MCKENNA, AICP
Executive Officer

DATE: March 28, 2011
TO: Chair and Members of the Formation Commission
FROM: Kate McKenna, AICP, LAFCO Executive Officer
SUBJECT: **PEBBLE BEACH COMMUNITY SERVICES DISTRICT – PROPOSED ACTIVATION OF LATENT POWERS TO CONVERT EXISTING OVERHEAD ELECTRIC AND COMMUNICATIONS FACILITIES TO UNDERGROUND LOCATIONS. (LAFCO FILE NO. 11-02)**

SUMMARY OF RECOMMENDATIONS:

It is recommended that the Commission conduct a public hearing and adopt the attached draft resolution (Attachment 2):

1. Finding that the proposal is exempt from environmental review pursuant to Section 15061(b)(3) and Section 15320 of the California Environmental Quality Act (CEQA) Guidelines;
2. Activating Latent Powers to Convert Existing Overhead Electric and Communications Facilities to Underground Locations, and
3. Authorizing the Executive Officer to hold Conducting Authority Proceedings on May 2, 2011 at 1:00 p.m. in the LAFCO office.

EXECUTIVE OFFICER'S REPORT:

Background

The Pebble Beach Community Services District currently provides many services within its boundaries (Attachment 1), including Fire Protection and Emergency Medical Services; Supplemental Law Enforcement; Wastewater Collection and Treatment and Recycled Water Distribution; and Garbage Collection, Disposal, and Recycling. The District proposes that it be able to add to its services by activating latent powers to convert existing overhead electric and communications facilities to underground locations.

Pebble Beach, also referred to as the Del Monte Forest, experiences many outages during rain and wind storms due to fallen trees. The outages are exacerbated since Pebble Beach is at the "end of a line" and often experiences longer outages than surrounding areas. The proposed undergrounding of utilities is planned to provide a community-wide benefit that would increase the reliability and safety of the utility system.

The District began considering the development of a program to relocate utilities underground when it conducted a preliminary feasibility study in 1996. There was public support for the undergrounding of utilities at that time, but the financial resources did not exist.

The District has concluded that it now has the resources to fund the phased undergrounding of utilities on a "pay-as-you-go" basis. During the last fifteen years, the District has completed large water system improvements for fire protection. Special projects funding that had been allocated for the water system is now available for other projects.

In October 2010, the engineering firm of RGA Design, LLC, completed the "Undergrounding Overhead Utilities Feasibility Study." The study identified and prioritized the sections of Pebble Beach that would most benefit from the undergrounding of aerial electric, phone, and cable lines to increase system reliability.

The District plans to allocate approximately \$1 million every year or two from current revenues to convert a portion of overhead electric and communications facilities to underground locations. Projects will be prioritized to maximize benefits to the largest number of residents. Due to a potential decrease in emergency response costs during storm events, the overall cost of existing governmental services may be reduced.

To underground utilities, District staff will continue to work with the consulting engineer, PG&E, Comcast, and AT&T to design a limited number of undergrounding projects. The District will bid the work, select a contractor, and monitor construction. Following completion, PG&E, Comcast and AT&T will assume ownership, operation, and maintenance of these underground utilities. The Pebble Beach CSD will then begin design of the next phased project, and will continue the cycle as necessary.

The Authorization of a "Latent Powers"

The Pebble Beach CSD is proposing that LAFCO authorize latent powers. A "latent power" is a function, or class of services, allowed for a district by State law but which are not currently authorized for that district. The Community Services District Law authorizes a community services district to "convert existing overhead electric and communications facilities, with the consent of the public agency or public utility that owns the facilities, to underground locations" (Government Code section 61100(m)). The Pebble Beach CSD does not currently exercise this power.

Section 61106 of the Community Services District Law states that a district must seek Formation Commission approval before exercising latent powers. Once this approval is granted the district may exercise of these powers.

Required Findings

Pursuant to the Community Services District Law, latent powers cannot be approved by LAFCO if it is determined that another local agency already provides substantially similar services in the area proposed to be served. There is no other agency in Pebble Beach that provides the service of undergrounding utilities.

While County ordinance requires the undergrounding of new utility connections, the Pacific Gas & Electric Company is the only entity relocating existing utilities underground. PG&E, however, only have the capability of converting approximately 30 miles of overhead line each year within its entire Northern and Central California service area. An estimated 34 miles of overhead lines currently exist within the boundaries of the Pebble Beach CSD.

Analysis for a Change of Organization

In 2008, the Cortese-Knox-Hertzberg Local Government Reorganization Act was amended to define the exercise of latent powers as a "Change of Organization." The Commission must consider fifteen factors in the review of a proposal for a change of organization (Government Code section 56668). These factors are discussed in Sections 2 through 16 for the attached draft resolution (Attachment 2). As outlined in the draft resolution, consideration of these factors supports the proposed activation of latent powers.

Public Agency Referrals and Public Noticing

LAFCO referred the proposal to public agencies for review and comment on January 25, 2011. On March 3, 2011, the application was scheduled and legally noticed in the Monterey County Herald for a March 28 hearing. Notice of the hearing was also posted on the LAFCO website and at the County Government Center and LAFCO office, and mailed to all known interested agencies, organizations and individuals. As the list of District property owners and registered voters exceeds 1000, the proposal is exempt from the requirement that a mailing be sent to all property owners and voters. Although not required by LAFCO, the District independently

notified all Pebble Beach property owners of the proposal by mail. LAFCO and the District, therefore, have fully complied with all requirements and procedures for public agency referrals and public noticing.

District/County Tax Transfer

The County Administrative Office has determined that a tax transfer is not required for this change of organization because no change would be made to the boundaries of the District and the District is not requesting a reallocation of taxes.

Environmental Determination

Legal Counsel for the Pebble Beach CSD has determined that this proposal is exempt from the requirements of the California Environmental Quality Act pursuant to CEQA Guidelines section 15061(b)(3) and section 15320. The first of these sections exempts "projects where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment. The second section exempts "specific classes of activities or projects, such as those consisting of changes in the organization or reorganization of local government agencies where the changes do not change the geographical area in which previously existing powers are exercised."

Agency and Public Comments

LAFCO has received no negative comments on the District's proposal. The only written communication received was a February 11, 2011 letter from the Monterey County Planning Department summarizing comments from County land use departments and agencies. In this letter the Planning Department requested that the District consult with the Department prior to the initiation of any of undergrounding project. The County would then determine if discretionary permits are required. Such permits may include a use permit for tree removal or for development on slopes over 25%).

In this same letter the County Parks Department stated that the undergrounding of utilities is to be encouraged for providing "unobstructed recreational airspace, aesthetic enjoyment of the natural world, easier maintenance and safety." The Parks Department also advised the exercise of caution during excavation to limit root damage to native trees.

In the application the District stated that it has contacted affected organizations, including PG&E, Comcast, AT&T, the Pebble Beach Company, and the Del Monte Forest Property Owners. These organizations expressed support for the undergrounding of utilities.

Agency comments are contained in Attachment 3 to this Executive Officer's Report.

Fees

LAFCO collected a deposit of \$3,000 toward the cost of processing this application. In accord with the LAFCO Fee Schedule, LAFCO will charge the full cost of the processing. Actual costs above the initial deposit will be required to be paid prior to the issuance of the Certificate of Completion, pursuant to a condition of approval.

Recommended Conditions of Approval

The recommended conditions of approval contained in Section 18 of the draft resolution (Attachment 2) are:

- a. Services provided by the Pebble Beach Community Services District shall be consistent with the Community Services District Law commencing with Government Code section 61000;
- b. Financing for the undergrounding of utilities shall be from the District's available discretionary funds and not from special assessments or taxes unless, where required, a District election is held to approve such special assessments or taxes, and
- c. The proposal is approved subject to the applicant's payment of all fees incurred in the processing of the application consistent with the LAFCO fee schedule.

The applicant is also required to defend LAFCO if legal action is initiated because of the approval of this application. This requirement is contained in Section 24 of the draft resolution (Attachment 2).

No conditions require review by the U.S. Department of Justice or the State Board of Equalization. The activation of latent powers, which does not alter the boundaries of the local agency, does not require review by these agencies.

Reconsideration

Pursuant to Government Code 56895, after the LAFCO Commission has adopted a resolution making determinations, any person or affected agency may file a written request with the LAFCO Executive Officer requesting amendments to, or reconsideration of, the resolution. The person or agency shall file the written request within 30 days of the adoption of the resolution.

Conducting Authority Hearing

State law requires a "Conducting Authority" hearing for a change of organization unless all property owners give their prior written approval of the proposal. State law requires that this second hearing follow the 30-day reconsideration period of the Commission's approval of a resolution making determinations.

Once the Conducting Authority hearing is noticed, registered voters and landowners within Pebble Beach may file a written protest. Written protests may also be submitted at the protest hearing. Following the close of the protest hearing, according to Government Code section 57075(a), the Commission shall order the change of organization or reorganization subject to confirmation by the registered voters residing within the affected territory if written protests have been filed and not withdrawn by either of the following: 1) At least 25 percent, but less than 50 percent, of the registered voters residing in the affected territory, or 2) At least 25 percent of the number of owners of land who also own at least 25 percent of the assessed value of land within the affected territory. The proposed change of organization or reorganization shall be abandoned if the Commission finds that written protests filed and not withdrawn prior to the conclusion of the hearing represent 50 percent or more of the voters residing in the territory.

Because no significant protest is anticipated to the District's proposal, and because the first regularly-scheduled Commission meeting after 30 days is not until May 23, staff recommends that the Commission delegate the authority to conduct this hearing to the Executive Officer. This would allow the Conducting Authority hearing to be scheduled for May 2. A Certificate of Completion will be recorded following this Executive Officer-conducted hearing unless the threshold for sufficient protest is met.

Conclusion

The proposed activation of powers is consistent with the factors to be considered in the review of a proposal for the activation of latent powers. These factors, and an analysis of the proposal's consistency with them, are included in the attached draft resolution (Attachment 2). Staff, therefore, recommends adoption of the attached draft resolution to approve the Pebble Beach Community Services District's proposal to activate latent powers to convert existing overhead electric and communications facilities to underground locations.

ALTERNATIVE ACTIONS

The Commission may consider these or other alternatives:

1. Deny the requested activation of latent powers, in which case the item should be continued to the April 25, 2011 Commission meeting with direction to staff to prepare a new draft resolution based on the Commission's findings for denial, or
2. Modify, delete, or add any findings, determinations, or conditions of approval.

Respectfully Submitted,



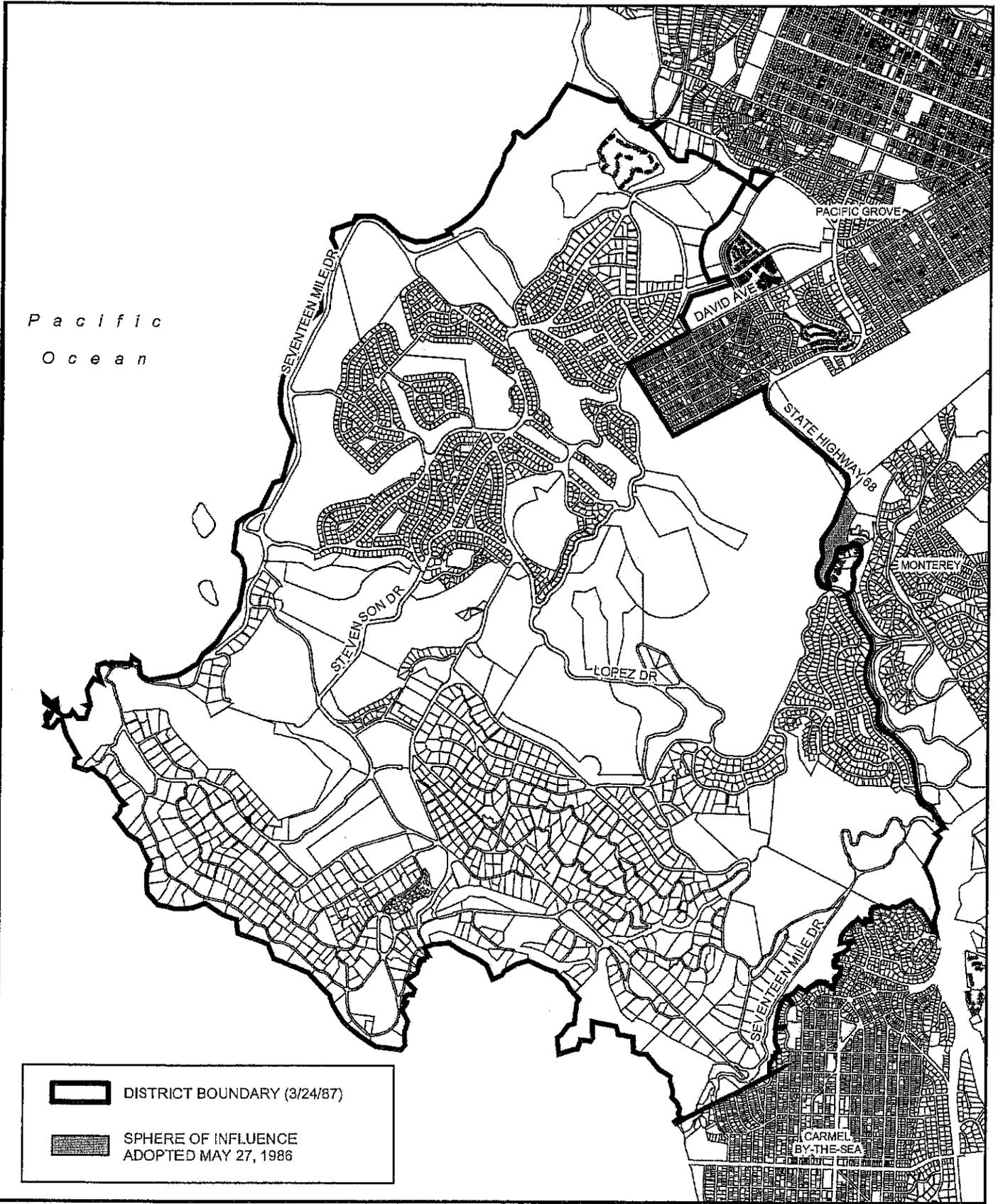
Kate McKenna, AICP
Executive Officer

Attachments:

- Attachment 1: Map of Pebble Beach Community Services District
- Attachment 2: Draft Resolution
- Attachment 3: Agency Comments

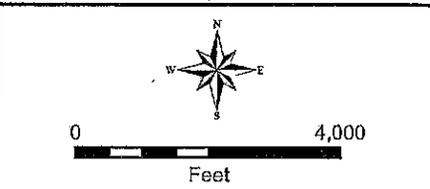
cc: LAFCO File 11-02
Christina Baca, Pebble Beach Community Services District

Attachment 1

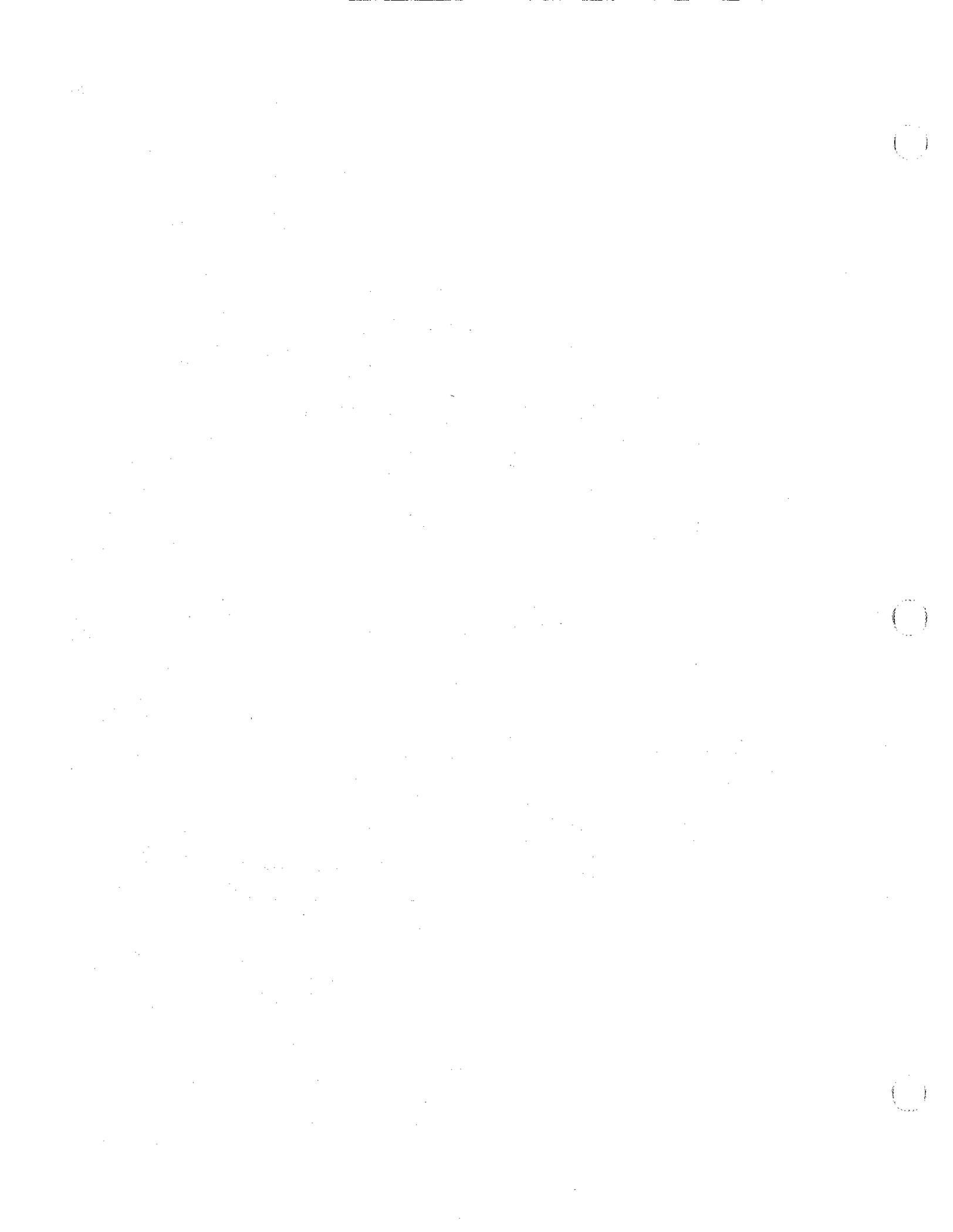


 DISTRICT BOUNDARY (3/24/87)
 SPHERE OF INFLUENCE ADOPTED MAY 27, 1986

LAFCO of Monterey County
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SPECIAL DISTRICTS
PEBBLE BEACH
COMMUNITY SERVICES DISTRICT



ATTACHMENT 2

RESOLUTION NO. 11 - __

**RESOLUTION OF THE LOCAL AGENCY FORMATION COMMISSION OF MONTEREY COUNTY
MAKING DETERMINATIONS APPROVING THE PROPOSAL
BY THE PEBBLE BEACH COMMUNITY SERVICES DISTRICT
TO ACTIVATE LATENT POWERS
TO CONVERT EXISTING OVERHEAD ELECTRIC AND COMMUNICATIONS FACILITIES
TO UNDERGROUND LOCATIONS. (LAFCO FILE NO. 11-02)**

RESOLVED, by the Local Agency Formation Commission of Monterey County, State of California, that

WHEREAS, the Pebble Beach Community Services District currently exercises the following powers as allowed by the Community Services District Law (Government Code section 61000 et seq.):

- Wastewater Collection and Treatment and Recycled Water Distribution, [Government Code section 61100(b)];
- Garbage Collection, Disposal, and Recycling [Government Code section 61100(c)];
- Fire Protection and Emergency Medical Services [Government Code section 61100(d)], and
- Supplemental Law Enforcement [Government Code section 61100(l and j)]; and

WHEREAS, the Pebble Beach Community Services District passed Resolution No. 10-21, dated December 10, 2010, supporting the proposed activation of latent powers to convert existing overhead electric and communications facilities to underground locations [Government Code section 61100(m)]; and

WHEREAS, Legal Counsel for the Pebble Beach Community Services District has determined that the proposal is exempt from requirements of the California Environmental Quality Act pursuant to CEQA Guidelines section 15061(b)(3) and section 15320; and

WHEREAS, an application by the Pebble Beach Community Services District, was filed and accepted for filing by the Executive Officer of the Local Agency Formation Commission, pursuant to Title 6, Division 3, commencing with Section 56000, et seq. of the Government Code; and

WHEREAS, a Certificate of Filing was issued for the application on February 15, 2011; and

WHEREAS, the Executive Officer, pursuant to Government Code section 56658, set March 28, 2011 as the hearing date on the proposal and gave the required notice of hearing; and

WHEREAS, the public hearing by the Commission was held upon the date and at the time and place specified in the notice of hearing and in any order or orders continuing such hearing; and

WHEREAS, the Executive Officer, pursuant to Government Code section 56665, has reviewed the proposal and prepared a report, including recommendations thereon, and has furnished a copy of the report to each person entitled to a copy; and

WHEREAS, the purpose for the change of organization is to provide a community-wide benefit that would increase the reliability and safety of the utility system; and

WHEREAS, the Commission, on March 28, 2011, heard from interested parties, considered the proposal and the report of the Executive Officer and considered the factors determined by the Commission to be relevant to the proposal, including, but not limited to, factors specified in Government Code section 56668.

NOW, THEREFORE, the Local Agency Formation Commission of Monterey County does HEREBY RESOLVE, DETERMINE, AND ORDER as follows:

Section 1. The proposal is categorically exempt from review under the California Environmental Quality Act CEQA Guidelines section 15061(b)(3) and section 15320. The first of these sections exempts "projects where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment. The second section exempts "specific classes of activities or projects, such as those consisting of changes in the organization or reorganization of local government agencies where the changes do not change the geographical area in which previously existing powers are exercised."

Section 2. *Population and population density; land area and land use; per capita assessed valuation; topography, natural boundaries, and drainage basins; proximity to other populated areas; the likelihood of significant growth in the area, and in adjacent incorporated and unincorporated areas, during the next 10 years (Gov. Code § 56668(a).)*

Pebble Beach is an unincorporated community within Monterey County, also referred to as the "Del Monte Forest." It is surrounded by the cities of Pacific Grove, Monterey, and Carmel. Much of the area is wooded. The proposal to activate the powers to convert existing overhead electric and communication facilities to underground locations is designed as a community benefit and will not affect existing populations or land use.

Section 3. *The need for organized community services; the present cost and adequacy of governmental services and controls in the area; probable future needs for those services and controls; probable effect of the proposed incorporation, formation, annexation, or exclusion and*

of alternative courses of action on the cost and adequacy of services and controls in the area and adjacent areas. (Gov. Code § 56668(b).)

The Pebble Beach Community Services District is the only governmental agency in the area capable of undergrounding utilities. Due to budgetary constraints, the private public utilities with overhead utilities within Pebble Beach do not have the resources needed to perform this work in the foreseeable future. The District has requested the ability to perform this public service throughout its boundaries on a "pay-as-you-go" basis with existing financial resources.

Section 4. *The effect of the proposed action and of alternative actions, on adjacent areas, on mutual social and economic interests, and on the local governmental structure of the county. (Gov. Code § 56668(c).)*

The activation of latent powers will have no effect on adjacent properties, or on mutual social and economic interests, or on local governmental structure of the County.

Section 5. *The conformity of both the proposal and its anticipated effects with both the adopted commission policies on providing planned, orderly, efficient patterns of urban development, and the policies and priorities set forth in Section 56377. (Gov. Code § 56668(d).)*

As stated in the application to LAFCO, activation of latent powers will provide a community-wide benefit that would increase the reliability and safety of the utility system.

Section 56377 pertains to development being directed away from open-space and agricultural land, unless to do so would not promote the planned, orderly, efficient development of an area. The proposal will have a positive effect by removing the visual impact of overhead utilities in open-space areas. Otherwise, the activation will not affect open-space or agricultural lands.

Section 6. *The effect of the proposal on maintaining the physical and economic integrity of agricultural lands, as defined in Section 56106. (Gov. Code § 56668(e).)*

The proposal will have no impact on maintaining the physical and economic integrity of agricultural lands. There are no commercial agricultural uses in Pebble Beach.

Section 7. *The definiteness and certainty of the boundaries of the territory, the nonconformance of proposed boundaries with lines of assessment or ownership, the creation of islands or corridors of unincorporated territory, and other similar matters affecting the proposed boundaries. (Gov. Code § 56668(f).)*

In the context of urban development, the boundaries of the Pebble Beach Community Services District are definite and certain and consistent with assessment lines and ownership. These boundaries will not be changed by the proposal.

Section 8. *A regional transportation plan adopted pursuant to Section 65080 [of the Government Code] and consistency with city or county general and specific plans. (Gov. Code § 56668(g).)*

The activation of latent powers will not change traffic volumes, flows or capacity and therefore is not covered by the Regional Transportation Plan. The area is designated primarily

for residential, open space/recreation, and visitor-serving commercial land uses. The proposal will not affect these designations or uses, and is consistent with the County General Plan and Local Coastal Plan.

Section 9. *The sphere of influence of any local agency, which may be applicable to the proposal being reviewed. (Gov. Code §§ 56375.5, 56668(h).)*

No local agency has a Sphere of Influence that is applicable to the proposal.

Section 10. *The comments of any affected local agency or other public agency. (Gov. Code § 56668(i).)*

LAFCO has received no negative comments on the District's proposal. The Monterey County Planning Department requested that the District consult with them prior to the initiation of any of undergrounding project to determine if discretionary permits are required. The County Parks Department commented that the undergrounding of utilities is to be encouraged for providing "unobstructed recreational airspace, aesthetic enjoyment of the natural world, easier maintenance and safety." The Parks Department also advised the exercise of caution during excavation to limit root damage to native trees.

Section 11. *The ability of the newly formed or receiving entity to provide the services which are the subject of the application to the area, including the sufficiency of revenues for those services following the proposed boundary change. (Gov. Code § 56668(j).)*

The Pebble Beach Community Services District has stated that it has funds available to initiate the undergrounding of utilities within its boundaries. These improvements will be made on a "pay-as-you-go" basis as funds become available. The activation of these powers will not obligate the District to undertake any specific improvement or to expand any funds.

Section 12. *Timely availability of water supplies adequate for projected needs as specified in Section 65352.5. (Gov. Code § 56668(k).)*

No water will be used for the activation of these powers. No significant amount of water will be used for utility excavation.

Section 13. *The extent to which the proposal will affect a city or cities and the county in achieving their respective fair shares of the regional housing needs as determined by the appropriate council of governments consistent with Article 10.6 (commencing with Section 65580) of Chapter 3 of Division 1 of Title 7. (Gov. Code § 56668(l).)*

The proposal will not affect the County's ability to achieve, or not achieve, its respective fair share of regional housing needs.

Section 14. *Any information or comments from the landowner or owners, voters, or residents of the affected territory. (Gov. Code § 56668(m).)*

LAFCO has received no comments from property owners, voters, or residents of the affected territory.

Section 15. Any information relating to existing land use designations. (Gov. Code § 56668(n).)

The area is designated primarily for residential, open space/recreation, and visitor-serving commercial land uses. The proposal is not inconsistent with these designations.

Section 16. The extent to which the proposal will promote environmental justice. As used in this subdivision, "environmental justice" means the fair treatment of people of all races, cultures, and incomes with respect to the location of public facilities and the provision of public services. (Gov. Code § 56668(o).)

Because of the nature of the project there are no economic justice issues.

Section 17. The exchange of property tax. (Revenue and Taxation Code § 99.01.)

The County Administrative Office has determined that a tax transfer is not required for this change of organization because no change would be made to the boundaries of the District and the District is not requesting a reallocation of taxes.

Section 18. Said proposal is approved subject to the following terms and conditions:

- a. Services provided by the Pebble Beach Community Services District shall be consistent with the Community Services District Law commencing with Government Code section 61000;
- b. Financing for the undergrounding of utilities shall be from the District's available discretionary funds and not from special assessments or taxes unless, where required, a District election is held to approve such special assessments or taxes, and
- c. The proposal is approved subject to the applicant's payment of all fees incurred in the processing of the application consistent with the LAFCO fee schedule.

Section 19. The Certificate of Completion shall not be issued until all terms and conditions are met.

Section 20. If a Certificate of Completion for a change of organization or reorganization has not been filed within one year after the Commission approves a proposal for that proceeding, the proceeding shall be deemed abandoned unless prior to the expiration of that year the Commission authorizes an extension of time for that completion. The extension may be for any period deemed reasonable to the Commission for completion of necessary prerequisite actions by any party. If a proceeding has not been completed because of the order or decree of a court of competent jurisdiction temporarily enjoining or restraining the proceedings, this shall not be deemed a failure of completion and the one-year period shall be tolled for the time that order or decree is in effect. [Government Code section 57001]

Section 21. The activation of latent powers to convert existing overhead electric and communications facilities to underground locations for the Pebble Beach Community Services District, consistent with Government Code section 61100(m), is hereby approved.

Section 22. The affected territory contains more than 12 registered voters, which constitutes "inhabited territory" as defined in Government Code section 56046. All Pebble Beach landowners have not consented in writing to the proposal. In accordance with Government Code section 57000 the Commission therefore authorizes the Executive Officer to notice and hold conducting authority proceedings on May 2, 2011 at 1:00 pm in the offices of LAFCO of Monterey County.

Section 23. The Executive Officer is hereby authorized and directed to mail certified copies of the resolution in the manner and as provided in Section 56882 of the Government Code.

Section 24. The applicant agrees as a condition of the approval of this application to defend at their sole expense any action brought against LAFCO, the Commission and its staff, because of the approval of this application. The applicant will reimburse LAFCO for any court costs and attorneys' fees which may be required by a court to pay as a result of such action. LAFCO may, at its sole discretion, participate in the defense of any such action; but such participation shall not relieve applicant of his obligations under this condition. The obligation on the part of the applicant to indemnify LAFCO is effective upon the adoption of this resolution and does not require any further action.

UPON MOTION OF Commissioner _____, seconded by Commissioner _____, the foregoing resolution is adopted this 28th day of March, 2011 by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

Don Champion, Ph.D., Chair
Local Agency Formation Commission of Monterey County

ATTEST: I certify that the within instrument is a true and complete copy of the original resolution of said Commission on file within this office.

Witness my hand this ____ day of March, 2011

By: _____
Kate McKenna, AICP, Executive Officer

MONTEREY COUNTY
RESOURCE MANAGEMENT AGENCY



PLANNING DEPARTMENT, Mike Novo, Director

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February 11, 2011

Kate McKenna, Executive Director
LAFCO
P.O. Box 1369
Salinas, CA 93902

Subject: Pebble Beach Community Services District (CSD) proposed activation of latent powers to convert existing overhead electric and communications facilities to underground locations (LAFCO 11-02) (REF110004; LAFCO File No. 11-02)

Dear Ms. McKenna:

The Monterey County land use departments and agency have reviewed the above-referenced proposal and have the following comments:

RMA - Planning Department

Once any Basis for Design Report is prepared for any project that is located in an unincorporated portion of Monterey County, the report should be submitted for review by the RMA-Planning Department along with any environmental documentation, prior to the commencement of work. At that time, the RMA-Planning Department will determine whether any discretionary permits (e.g., use permit for tree removal, use permit for development on slopes over 25%, etc.) and/or review by other County land use departments is required.

Parks Department

The Parks Department has no substantive comments on this LAFCO application. As an aside, parks staff opines that any opportunity to place utilities underground, and especially near park recreation facilities, is to be encouraged for unobstructed recreational airspace, aesthetic enjoyment of the natural world, easier maintenance and safety. Avoiding the ongoing maintenance required trimming limbs around power lines and/or avoiding the need to cut swaths through vegetated areas for easier access to the utilities is to be encouraged. Though it is not understood how "latent powers" is defined in the application, we understand that the RMA – Planning, Public Works and Building Departments place as standard conditions of approval for subdivisions the placement of subterranean utility lines.

On the other hand, trenching for underground utilities involves avoidance of extensive root damage and accurate mapping of the utility lines required for future reference. While utility mapping is standard practice, it is unclear to what extent careful trenching around native plants such as the

Monterey Cypress and Pine trees is respected, which in some cases may require hand-digging. We trust that certified foresters and arborists will be consulted when trenching is occurring through native vegetated areas.

Thank you for the opportunity to comment on the proposal. Feel free to contact me if you have any questions.

Sincerely,

Bob Schubert, AICP
Senior Planner