

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT
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F16a

LCP-3-STC-21-0071-2 (WIRELESS TELECOMMUNICATION FACILITIES)

FEBRUARY 11, 2022 HEARING

CORRESPONDENCE

ZONING/PERMIT PROCESSING
831/420-5100 • FAX 831/420-5101
INSPECTION SERVICES
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COMPREHENSIVE PLANNING,
HOUSING AND
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831/420-6250 • FAX 831/420-6458

809 Center Street • Room 206 • Santa Cruz, CA 95060 • www.cityofsantacruz.com
LEE BUTLER, DIRECTOR OF PLANNING AND COMMUNITY DEVELOPMENT

February 4, 2022

California Coastal Commission
C/O Dan Carl, District Director
725 Front Street, Suite 300
Santa Cruz, CA 95060-4508

SUBJECT: City of Santa Cruz LCP Amendment No. LCP-3-STC-21-0071-2 (Wireless Telecommunications Facilities)

Honorable Chair Brownsey and Members of the Coastal Commission:

I'd like to first express my sincere appreciation for all the work your staff put in on this LCP amendment and its willingness to work with City staff to balance Coastal Act requirements with Federal Law. As the staff report points out, this amendment was prompted by the "shot clock" requirements for wireless facilities contained in Federal Government's Spectrum Act. Those shot clock requirements were, in fact, an area of focus in our collaboration. It is unfortunate that Federal law and its "shot clock" provisions do not adequately take into account the way in which coastal permits and potential appeals, including to the Commission, are processed in the coastal zone. These Federal laws raise concerns regarding the Coastal Commission's ability to meet the Federal shot clock standards in the event an appeal is filed. The City and Coastal Commission staff have collectively worked to address the issues engendered in a Coastal Act and LCP consistent way. The City is committed to expeditiously processing small cell wireless telecommunications facilities in an effort to provide your staff with as much time as possible to comply with shot clock timelines in the event of an appeal and looks forward to continued work with your staff to further streamline approval of these facilities consistent with State and Federal laws.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric Marlatt", is written over a blue diagonal line that extends from the "Sincerely," text.

Eric Marlatt
Assistant Director of Planning and Community Development

cc: Lee Butler
Samantha Haschert
Clara Stanger
Barbara Choi
Stephanie Hall