

**APPENDIX C**

**SCOPING LETTERS**

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## Appendix C

**Table C-1: Summary of Scoping Comments and Where Addressed in This PEA**

Commenter	Issues/Concerns	Where Addressed in this PEA
County of Los Angeles, Chief Executive Office, September 14, 2015 letter	<p>Letter provided two points of clarification:</p> <p>(1) Los Angeles County has a smaller-scale interoperable LMR system, but it is used by disaster recovery agencies and not primary responders.</p> <p>(2) Although inadequate, there is a system that currently exists; however, the system is not interoperable region-wide in its configuration and relies exclusively on radio spectrum that will no longer be available for exclusive public safety use after FCC statutorily-mandated actions in 2022.</p> <p>Letter expresses full support for the LARICS project.</p>	The purpose of and need for the proposed project is described in Section 1.5 of this PEA.
City of Calabasas, September 8, 2015 letter	Consider City's Scenic Corridor Development Guidelines in design of project.	Specific sites by city location are not addressed in this PEA, but site-specific effects will be evaluated prior to grant funding; that process is summarized in Section 1.2.2 and Figure 1.2-1 of this PEA. Visual effects are addressed in Section 4.11 of this PEA.
	Observe City's Municipal Code (Section 17.32) that protects native oak trees and City's Oak Tree Ordinance to preserve oak trees	Specific sites by city location are not addressed in this PEA, but site-specific effects will be evaluated prior to grant funding; that process is summarized in Section 1.2.2 and Figure 1.2-1 of this PEA. Local land use plans, policies, and regulations are addressed in Sections 3.1 and in 4.1.2 of this PEA.
City of Chino Hills, September 15, 2015 letter	Submit permit application and deposits for site within city limits.	Comment noted. No response required in this PEA.
City of Glendora (via Chatten-Brown & Carstens LLP), September 10, 2015 letter	Aesthetic impacts must be addressed	Visual effects are addressed in Section 4.11.2 of this PEA.
	City is concerned about public safety, specifically radiowave / microwave emissions.	Human health effects, including RF emissions, are addressed in Section 4.5 of this PEA.

## Appendix C

**Table C-1: Summary of Scoping Comments and Where Addressed in This PEA**

Commenter	Issues/Concerns	Where Addressed in this PEA
	Request procedures to examine alternate site locations	Specific sites are not addressed in this PEA. Site-specific effects will be evaluated prior to grant funding; that process is summarized in Section 1.2.2 and Figure 1.2-1 of this PEA. Appendix B of this PEA includes a list of sites, some of which have been eliminated from consideration. As indicated in Section 1.0, grant funding for up to 90 sites is proposed and all sites remaining under consideration are alternative site locations that may be constructed.
	Properly involve City - provide adequate review time for NEPA and CEQA processes and coordinate the reviews.	Section 1.6 of this PEA describes process to announce availability of this PEA and how it was made available for review and comment.
Huntington Park – Community Development Department, August 26, 2015 letter	Requested list of potential LMR project sites.	The list of potential LMR sites is included in Appendix B.
	Requested information on whether any LMR project sites are located within City of Huntington Park, and if so, whether on private or public right-of-way.	Specific sites by city location are not addressed in this PEA, although the list of sites considered is included in Appendix B. Site-specific effects will be evaluated prior to grant funding; that process is summarized in Section 1.2.2 and Figure 1.2-1 of this PEA
City of Rancho Palos Verdes, September 10, 2015 letter transmitting previous comment letters dated September 23 and 29, 2014.	Site PVC would impact visual resources. Eliminate site or fully evaluate aesthetic impacts of site.	As indicated in Appendix B, Site PVC has been eliminated from consideration.
	Site PVC would be surrounded by the Alta Vicente Reserve of the Palos Verdes Nature Preserve. Site RHT would abut the Vista del Norte Reserve of the City's Palos Verdes Nature Preserve. Eliminate sites or fully evaluate biological resource impacts.	Specific sites are not addressed in this PEA, but site-specific effects will be evaluated prior to grant funding; that process is summarized in Section 1.2.2 and Figure 1.2-1 of this PEA. Biological resource effects are addressed in Section 4.4.2 of this PEA.
	Site PVC would impact cultural resources. Eliminate site or fully evaluate cultural resource impacts.	As indicated in Appendix B, Site PVC has been eliminated from consideration.
	A significant portion of Site RHT is within the City of Rollins Hills Estates; recommend you contact them to identify historic resources within their jurisdiction.	Historic properties are addressed in Section 3.7 and 4.7.2 of this PEA.

## Appendix C

**Table C-1: Summary of Scoping Comments and Where Addressed in This PEA**

Committer	Issues/Concerns	Where Addressed in this PEA
	An approximate five-acre portion of the city property surrounding site PVC is leased to James Hatano, who returned to farming this last vestige of commercial agricultural property after the Japanese internment during World War II.	As indicated in Appendix B, Site PVC has been eliminated from consideration. Land use impacts, including prime or unique farmland, are addressed in Section 4.1.2 of this PEA.
	Fully evaluate the impact of hazardous materials at Sites PVC, RHT, and SPC for impacts to schools within 0.25 mile radius.	Specific sites are not addressed in this PEA, but site-specific effects will be evaluated prior to grant funding; that process is summarized in Section 1.2.2 and Figure 1.2-1 of this PEA. Human health effects are addressed in Section 4.5.2 of this PEA.
	Site RHT would impact visual resources; eliminate site or fully evaluate aesthetic impacts of the site. Fully evaluate feasibility of collocating LMR equipment with existing antenna structure.	Specific sites are not addressed, in this PEA, but site-specific effects will be evaluated prior to grant funding; that process is summarized in Section 1.2.2 and Figure 1.2-1 of this PEA. Visual effects are addressed in Section 4.11.2 of this PEA. Section 2.2.4.1 of this PEA provides the criteria used in determining if collocation on existing antenna support structures would be feasible.
	Site RHT should not be located within portion of the site that is zoned "Open Space-Hazard." Fully evaluate land use and planning impacts.	Specific sites are not addressed, in this PEA, but site-specific effects will be evaluated prior to grant funding; that process is summarized in Section 1.2.2 and Figure 1.2-1 of this PEA. Land use effects are addressed in Section 4.1.2 of this PEA.
	Site SPC would impact visual resources. Fully evaluate aesthetic impacts of the site. Fully evaluate feasibility of collocating LMR equipment with existing antenna structures.	As indicated in Appendix B, Site SPC has been eliminated from consideration.
	Site SPC is located within City of Rollins Hills; recommend you contact them to identify historic resources within its jurisdiction.	As indicated in Appendix B, Site SPC has been eliminated from consideration.

## Appendix C

**Table C-1: Summary of Scoping Comments and Where Addressed in This PEA**

Committer	Issues/Concerns	Where Addressed in this PEA
	Fully evaluate geology and soils impacts regarding landslides and expansive soils. Mandate site-specific geologic and geotechnical studies prior to construction.	Effects on geology and soils as well as seismic risks are addressed in Section 4.2.2 of this PEA. As indicated in Section 2.2.1, site-specific geotechnical investigations are proposed.
	Fully evaluate hydrology and water quality impacts. Mandate site-specific conditions for compliance with local, state, and federal water quality regulations prior to construction.	Effects on water resources are addressed in Section 4.3.2 of this PEA.
	Fully evaluate noise and transportation/traffic impacts. Mandate specific mitigation measures to address them.	Effects from noise are addressed in Section 4.10.2. Effects on transportation are addressed in Section 4.8.2 of this PEA. Mitigation measures are listed in Appendix F of this PEA.
	Consider only collocating new antennae with existing structures rather than construct new towers and monopoles.	Section 2.2.4.1 of this PEA provides the criteria used in determining if collocation on existing antenna support structures would be feasible. Effects on environmental resources for each site type are addressed throughout Section 4 of this PEA.
	Clarify if the city will have authority to review sites through development review and building permit processes.	As indicated in Section 4.1.2.1 of this PEA, the Authority would be responsible for obtaining required approvals from appropriate authorities to be consistent with the land use plans of jurisdictions with authority for a proposed LMR site. However, as noted in Section 3.1.1.4 of this PEA, the Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity [California Government Code § 53090(a) and 53091(a)].

## Appendix C

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**Table C-1: Summary of Scoping Comments and Where Addressed in This PEA**

Commenter	Issues/Concerns	Where Addressed in this PEA
	Will sites within the city be included if the city opts out of participating?	As discussed in Section 1.6 of this PEA, although some cities have elected to not participate in the LMR project, sites within those cities may still be considered to provide full voice coverage of the system with the fewest number of sites possible.
Brentwood Hills Homeowners Association, September 14, 2015 letter	Site SVP would impact visual resources and wildlife.	Specific sites are not addressed in this PEA, but Site SVP has been eliminated from consideration, as indicated in Appendix B.
Sierra Club – Santa Monica Mountains Task Force, September 15, 2015 email	Proposed Site SVP would impact parkland, viewsheds, and sensitive habitat on San Vicente Peak and within Mulholland Scenic Corridor.	As indicated in Appendix B, Site SVP has been eliminated from consideration.



County of Los Angeles  
**CHIEF EXECUTIVE OFFICE**

Kenneth Hahn Hall of Administration  
500 West Temple Street, Room 713, Los Angeles, California 90012  
(213) 974-1101  
<http://ceo.lacounty.gov>

SACHI A. HAMAI  
Interim Chief Executive Officer

Board of Supervisors  
HILDA L. SOLIS  
First District

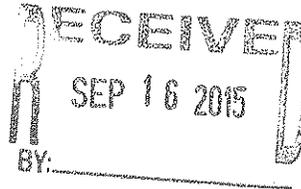
MARK RIDLEY-THOMAS  
Second District

SHEILA KUEHL  
Third District

DON KNABE  
Fourth District

MICHAEL D. ANTONOVICH  
Fifth District

September 14, 2015



Ms. Jill S. Dale  
Grants Program Sr. Environmental Specialist  
U.S. Department of Homeland Security/FEMA Region IX  
1111 Broadway, Suite 1200  
Oakland, California 94607

Dear Ms. Dale:

**Los Angeles Regional Interoperable Communications System (LA-RICS)  
Land Mobile Radio (LMR) Project - HSGP 2010-SS-TO-0085 (17651)  
Subrecipient: City of Los Angeles**

As a member of the Joint Powers Authority for the Los Angeles Regional Interoperable Communication System (LA-RICS), the County of Los Angeles wholeheartedly supports:

- (1) This Land Mobile Radio (LMR) Project, and
- (2) The Department of Homeland Security's Federal Emergency Management Agency (FEMA) proposal to fund the associated installation of emergency communications facilities in the Los Angeles County Operational Area.

Therefore, we encourage FEMA to favorably consider this project during your due diligence with this National Environmental Policy Act (NEPA) compliance process.

Two points of clarification should be brought to your attention. First, there is a smaller-scale interoperable LMR system currently operating by and within Los Angeles County, but it is used by disaster recovery agencies and not primary responders. The proposed project will allow for consolidation of its infrastructure and equipment with the existing LMR system such that interoperable communications capabilities will be available regionally for all public safety responders and emergency managers.

Second, the new LMR project was described in FEMA's August 13, 2015 letter as one which "would establish a communications system for emergency responders, currently not available, that would allow for an efficient and coordinated response to emergencies

*"To Enrich Lives Through Effective And Caring Service"*

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Intra-County Correspondence Sent Electronically Only**

Ms. Jill S. Dale  
September 14, 2015  
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in the County of Los Angeles.” Although woefully inadequate, there is a system that currently exists. However, the existing system is not interoperable region-wide in its configuration, and it relies exclusively on radio spectrum that will no longer be available for exclusive public safety use after Federal Communications Commission (FCC) statutorily-mandated auctions in 2022. All of this magnifies the need for the proposed project.

The County of Los Angeles fully supports the LA-RICS project, and respectfully request that FEMA expedite this NEPA compliance review as well as support the funding for this much-needed region-wide interoperable communications project.

We trust that these comments will assist in your NEPA assessment of proposed project, and facilitate your reaching positive conclusions regarding continued financial support. However, if we can be of additional assistance, please feel free to contact me or Alvia Shaw, of my staff, at (213) 974-7315 or [ashaw@ceo.lacounty.gov](mailto:ashaw@ceo.lacounty.gov).

Sincerely,



SACHI A. HAMAI  
Interim Chief Executive Officer

SAH:ADC  
AS:tlh



CITY of CALABASAS



September 8, 2015

US Department of Homeland Security  
1111 Broadway, Suite 1200  
Oakland, CA 94607  
Attn: Ms. Jill S. Dale

RE: Los Angeles Regional Interoperable Communications System (LA-RICS), Land Mobile Radio (LMR) Project, HSGP 2010-SS-T0-0085 (17651)

Dear Ms. Dale,

The City of Calabasas is in receipt of your Agency's notice to prepare a Programmatic Environmental Assessment on the LMR project in compliance with National Environmental Policy Act (NEPA). It is our understanding that one or more of the proposed facilities will be located within the City of Calabasas. Please include this document as the City of Calabasas' official comments regarding the proposed project.

From previous communications with LA-RICS representatives, the City is aware of three locations that were considered for construction of LA-RICS facilities. The three locations are 24130 Calabasas Road, 5215 Las Virgenes Road and 27050 Agoura Road. All three locations are located within a City designated scenic corridor. As such, all development within a designated Scenic Corridor is subject to design parameters contained with the *Scenic Corridor Development Guidelines*. All development within a scenic corridor should be designed to blend in with the surrounding environment. As a result, communication facilities should be of a stealth design in order to achieve this goal. The Fire Station located at 5215 Las Virgenes Road is also located within the Las Virgenes Gateway Master Plan, which contains specific development standards and aesthetic criteria, such as Monterey style architecture, for this portion of the City. Finally, Section 17.32 of the Calabasas Municipal Code (CMC) protects native oak trees. In accordance with the City's Oak Tree Ordinance, "It is the policy of the city to preserve and enhance its ecosystem, one element being its inventory of oak trees and scrub oak habitat". The City respectfully requests that your agency consider the above mentioned documents and ordinance in the evaluation of environmental impacts as a result of the build-out of LA-RICS facilities.

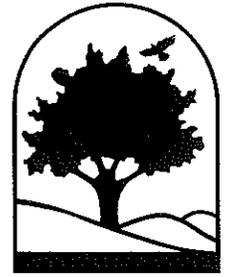
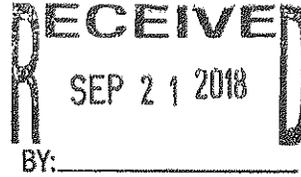
Sincerely,

Michael Klein  
Planner  
City of Calabasas, CA  
Tel: (818) 224-1710  
mklein@cityofcalabasas.com

100 Civic Center Way  
Calabasas, CA 91302  
(818) 224-1600  
Fax (818) 225-7324



City of Chino Hills



14000 City Center Drive  
Chino Hills, CA 91709  
(909) 364-2600  
[www.chinohills.org](http://www.chinohills.org)

September 15, 2015

Ms. Jill S. Dale  
1111 Broadway, Suite 1200  
Oakland, CA 94607

**SUBJECT: Los Angeles Regional Interoperable Communications System (LA-RICS), Land Mobile Radio (LMR) Project**

Dear Ms. Dale,

The City would like to appreciate this opportunity to work with City of Los Angeles and U.S. Department of Homeland Security Region IX on the Land Mobile Radio Project. It is to our knowledge, based on the notice letter sent to the City of Chino Hills in 2014, the project description and locations of the proposed radio towers show one particular location within city limits of Chino Hills. In order to acquire appropriate permits, the following applications will be required;

1. Site Development Permit Application (\$6,042 deposit)
2. Trust Deposit Account Application
3. Trust Deposit Account Agreement

The Site Development Permit Application is processed administratively at the Director of Community Developments discretion. This process should take anywhere between 1-3 months to obtain approval.

If you have questions, please contact me at (909) 364-2777.

Sincerely,

COMMUNITY DEVELOPMENT DEPARTMENT

A handwritten signature in black ink, appearing to read "MH", written over a light blue horizontal line.

Michael Hofflinger  
Associate Planner

Encl: Site Development Permit Application  
Trust Deposit Account Application  
Trust Deposit Account Agreement



**City of Chino Hills**  
**Community Development Department**  
**Planning Division**  
**14000 City Center Drive**  
**Chino Hills, CA 91709**  
**(909) 364-2740 Fax (909) 364-2795**  
**www.chinohills.org**

## **SITE DEVELOPMENT PERMIT INFORMATION & APPLICATION**

A Site Development Permit provides an administrative review and approval of detailed plans for proposed uses which have a relatively low potential for adverse impact on the subject site or the surrounding community due to the nature or magnitude of the use. This is an Actual Cost application. The actual cost for a project is determined by the time spent by staff on that project and the associated personnel benefits, department overhead, and other costs incurred for that project.

**APPLICATION FEE:** Refer to the Community Development Fee/Deposit Schedule for application fee amounts.

### **ADDITIONAL FEES:**

**Fire District Review Fee:** Fire District Review Fees will be required prior to application submittal. Contact the Chino Valley Independent Fire District at (909) 902-5280 for fee applicability and payment prior to application submittal.

**Building and Safety Review:** For projects requiring a Geology Report or a Geologic Feasibility Analysis. Refer to the Community Development Fee/Deposit Schedule for application fee amounts. This deposit must be submitted to the building and safety public service counter by a separate check.

### **SITE DEVELOPMENT PERMIT INFORMATION & PROCEDURES:**

1. We encourage you or a representative to discuss the site proposal with the Planning Department staff at the public information counter to obtain general information regarding applicable regulations and necessary procedures. If further information is required, a pre-application conference or consultation may be appropriate.

**SEE REVERSE SIDE FOR ADDITIONAL REQUIREMENTS**

Applications and fees are subject to change. Please visit our website for the most current version of this application.



**City of Chino Hills**  
**Community Development Department**  
**Administration**  
**14000 City Center Drive**  
**Chino Hills, CA 91709**  
**(909) 364-2740 Fax (909) 364-2795**  
**www.chinohills.org**

## TRUST DEPOSIT ACCOUNT APPLICATION

### PART I PROJECT OWNER INFORMATION\*

Name of Owner/Legal Entity: \_\_\_\_\_  
 (Individual name or corporate name under which all financial transactions for this project will be conducted)  
 Billing Address: \_\_\_\_\_  
 \_\_\_\_\_

Name of Contact: \_\_\_\_\_  
 (Typically the project manager at the project owner or legal entity's firm)  
 Contact's Phone Number(s): Phone: \_\_\_\_\_  
 Fax: \_\_\_\_\_

### PART II APPLICANT INFORMATION

Name of Applicant: \_\_\_\_\_  
 (Typically the Project Owner's representative authorized to submit the project and will be the City's main contact)  
 Name of Contact: \_\_\_\_\_  
 Contact's Phone Number(s): Phone: \_\_\_\_\_  
 Fax: \_\_\_\_\_

### PART III PROJECT INFORMATION

Name of Project: \_\_\_\_\_  
 Project Description: \_\_\_\_\_  
 \_\_\_\_\_  
 Project Location: \_\_\_\_\_

**\* UNLESS THE PROJECT OWNER MAKES OTHER ARRANGEMENTS IN WRITING, THE PROJECT OWNER WILL BE FINANCIALLY RESPONSIBLE FOR THE PROJECT INCLUDING DEFICITS AND WILL ALSO BE THE ONLY PARTY ENTITLED TO ANY REFUNDS AT THE END OF THE PROJECT**

Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
 Print Name: \_\_\_\_\_

For Office Use Only	
Submittal Date	_____
Please provide TDA number:	
Community Development TDA No. 16	_____
Engineering TDA No. 17	_____

Applications and fees are subject to change. Please visit our website for the most current version of this application.

2. Once a formal application is submitted, the application will be scheduled for the Project Review Committee (PRC) meeting where staff from the different City Departments and Divisions will comment on the proposal, discuss whether the application is complete or incomplete, and identify any corrections that are required on the plan(s). If the application is complete and there is no correction that must be made on the plan(s), the PRC will discuss conditions of approval, and make a recommendation to the Director of Community Development.
3. Any decision by the Director of Community Development or designee may be appealed to the Chino Hills Planning Commission.

**SUBMITTAL CHECKLIST:**

(All Items must be included at the time of submittal)

PLEASE RETURN THIS CHECKLIST WITH APPLICATION PACKET UPON SUBMITTAL. ONLY USE CITY FORMS. IF MORE SPACE IS NEEDED, USE ATTACHEMENTS. COMPUTER GENERATED APPLICATIONS ARE NOT ACCEPTABLE.

- \_\_\_ **One (1) Copy** of completed application.
- \_\_\_ **One (1) signed and dated** copy of the "Trust Deposit Account Procedures/ Agreement" Form.
- \_\_\_ **Fifteen (15) copies** of plot plan, floor plans, conceptual grading, and elevations drawn at a scale to accurately delineate the proposed project. (Folded accordion style – 8 x 11 size.) (Refer to the plot plan checklist for specific requirements. A conceptual plan is not acceptable.)
- \_\_\_ **One (1) reduced copy** (8 x 11) of each plan submitted.
- \_\_\_ **Three (3) copies** of photo simulations, if required.
- \_\_\_ **One (1) Copy** of a Preliminary Title Report, if required.
- \_\_\_ **Three (3) copies** of technical studies (RF emission analysis, coverage area, and site locations throughout the City, etc.).
- \_\_\_ **One (1) copy** of the receipt of payment of Fire Review Fees or letter stating such fees are not applicable. (Payment of these fees may be accomplished at the Chino Valley Independent Fire District, located at 14011 City Center Dr., Chino Hills, CA 91709. Please contact the Fire District at Phone Number (909) 902-5280 regarding Fire Review Fees.

**SPECIFIC PLOT PLAN REQUIREMENTS:**

SITE PLAN TO BE DRAWN TO SCALE ON ONE SHEET (MINIMUM 18" X 24") SHOWING THE FOLLOWING ITEMS:

- \_\_\_ Names, addresses and telephone numbers of the record owner, applicant and the person preparing the map.
- \_\_\_ Legal description and Assessor's Parcel Number of the property involved.
- \_\_\_ North point, date of drawing and **ENGINEER'S** scale (suggest 1:20 or 1:30).
- \_\_\_ Location, width and names of streets and recorded easements on property. Locate all existing road improvements and driveway locations.
- \_\_\_ Dimensions of property lines or boundary lines of project and parcels within project.
- \_\_\_ Location, size and use of all existing and proposed buildings and structures, including dimensions, square footage, distance from property lines, and building separation.

- \_\_\_ Locate all signs, including a side elevation for all proposed signs showing the face dimensions, overall height, and height above grade from bottom of sign.
- \_\_\_ Submit a letter of intent clearly indicating all intended uses associated with the proposal, which clearly identifies the specific areas in which uses will be conducted.
- \_\_\_ Indicate the present land use of all surrounding property.
- \_\_\_ Show parking spaces in detail. Refer to the City's Development Code for detailed information regarding parking requirements for your use and for handicapped parking requirements.
- \_\_\_ Show loading zone space(s) (10'x20'), if required.
- \_\_\_ Indicate any unusual drainage or hilly terrain that might affect the building site, parking area or access by flow line arrows and contour lines.
- \_\_\_ Vicinity Map.

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**City of Chino Hills**  
**Community Development Department**  
**Planning Division**  
**14000 City Center Drive**  
**Chino Hills, CA 91709**  
**(909) 364-2740 Fax (909) 364-2795**  
**www.chinohills.org**

**SITE DEVELOPMENT PERMIT  
APPLICATION QUESTIONNAIRE**

Owner's Name: \_\_\_\_\_

Telephone No.: \_\_\_\_\_ Fax No.: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Assessor's Parcel Number: \_\_\_\_\_

Individual to be notified other than owner:

Name: \_\_\_\_\_ Telephone No.: \_\_\_\_\_

Address: \_\_\_\_\_

Address or general location of property: **(Important: Indicate which side of the street, property's location from nearest street or intersection)**

\_\_\_\_\_  
\_\_\_\_\_

Project Description: (Please provide as much detail as possible.)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I certify under penalty of perjury that I am the (check one):

- Legal Owner (all individuals must sign their names, names appear on the deed to the land, or)
- Owner's Legal Agent, and that the foregoing is true and correct.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Print Name: \_\_\_\_\_ Date: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Print Name: \_\_\_\_\_ Date: \_\_\_\_\_



**City of Chino Hills  
Community Development Department  
Administration  
14000 City Center Drive  
Chino Hills, CA 91709  
(909) 364-2740 Fax (909) 364-2795  
www.chinohills.org**

**Trust Deposit Account Agreement**

**October 1, 2007**

Final

1. In order to process a land development project in the City of Chino Hills (City), a Trust Deposit Account (TDA) must be established prior to the City commencing any work on the project. The following information must be provided and the following provisions agreed to in order to establish a TDA:
  - a. Name of Applicant: Project Owner or Legal Entity: (This will be the corporate name under which all financial transactions for this project will be conducted.)
  - b. Billing Address for Applicant.
  - c. Contact Person for the Applicant and Contact Person's Phone Number(s).
  - d. Name of Project, Project Description & Location.
2. The following will be provided by City staff:
  - a. The required project deposit amount.
  - b. An assigned Project Manager.
3. When paying the initial TDA deposit amount or any required supplemental payments:
  - a. The Trust Deposit Account number must be placed on all checks to ensure proper posting of payments made.
  - b. There will be a return check charge of \$33.00.
  - c. Once a check has been returned, applicant must pay with a cashier's check or cash.
  - d. A Stop Work Status will be issued if required TDA deposits are not paid within two weeks of the request for additional TDA funds. Work will re-commence once the funds are received. (If the applicant does not agree with project charges and would like an opportunity to protest the charges without slowing work on the project, he/she may pay the required TDA supplemental amount in order to keep the project moving forward while the protest of charges is considered.)
  - e. The Project Manager will be the communication link between applicants and the City, except for issues that are purely financial in nature, which the applicant may direct to Finance staff.

Applications and fees are subject to change. Please visit our website for the most current version of this application.

4. On a monthly basis, the Finance Department will mail financial status statements to the applicant, which will consist of project costs incurred by City staff, consultants, and legal fees, in addition to reimbursable costs, such as postage, courier services, County Clerk charges, etc.
5. Applicant has 30 days from the date of preparation of the monthly statement to dispute any charge(s).
  - a. Disputes shall be submitted, in writing, to the Finance Department. Finance staff will route disputes to the appropriate Department Director.
6. City will investigate any charge disputes within ten (10) business days of written notice of the dispute and will notify applicant of outcome of investigation within five (5) additional business days. This decision will be final.
7. Supplemental deposits may be required periodically, which will be determined by the Project Manager and/or the Department Director. When additional deposit has been requested, work will be suspended on the project when ninety-five (95) percent of the deposit previously received has been expended.
8. A separate, ancillary project TDA may be required for large projects if there are Council-approved contracts issued to support the project, such as for EIR consultant services, quality control engineering, etc. This will be handled separately from the primary project TDA. A separate monthly financial statement will be prepared for this type of TDA.
9. Ancillary TDAs will not be included in or referenced on a project's monthly primary account TDA statement.
10. Work will not continue unless and until any required additional TDA deposit amount is received. Projects will not be brought before the approving body for review and approval if money is due.
11. If a change of ownership occurs for the project, the existing owner must notify the City, in writing, of the change, and must provide for the effective date of the change.
  - a. The Project Manager, in cooperation with the Building/Engineering/ Planning Counter will open a new account, along with requiring an initial TDA deposit for the new applicant. This will be submitted to Finance, as with the initiation of any new project TDA.
  - b. A new TDA number will be issued for the new legal entity.
  - c. If the new applicant has acquired (as part of the project acquisition) the project TDA funds already deposited with the City by the existing applicant, a notarized letter from the existing applicant directing the transfer of those funds to the new applicant must be submitted to the City.
  - d. If the new applicant is not acquiring the project funds on file with the City as part of the ownership transfer, the existing applicant will go through the TDA refund process once all charges for the project have been paid and the outlined deposit refund timeframe has transpired.
12. Post Entitlement/Public Improvements TDAs:
  - a. For the Post Entitlement/Public Improvements phase, a new TDA will be created. The Engineer's estimate for public improvements for the project will be used to establish the required deposit amount.
  - b. The deposit amount may consist of new and/or transferred funds from the Entitlement TDA, if the applicant is the same for both phases of the project, or from new funds if the applicants are different for the two phases of the project.

13. Refund Process:

- a. At the completion of the project, a refund for any remaining TDA funds will be issued to the applicant, commensurate with the project's bond release.
  - i. The applicant is to request a refund through the defined refund process.
  - ii. If no refund is requested, any remaining funds may become the property of the City after the required period of time elapses, in accordance with California law.
- b. If a new legal entity acquires a project before its completion, the prior entity may request a refund of any remaining TDA balance in the prior entity's account. Such a refund will not occur until at least 90 days has elapsed after the effective date of the change in project ownership, and City staff has determined that all appropriate charges have been posted and collected against the prior entity's TDA.

14. Miscellaneous:

- a. TDA deposits may be used to cover unpaid bills owed to the City, including any department or district it controls or administers, e.g. water charges that have not been paid.
- b. Monthly statement financial questions are to be directed to the Finance Department, Trust Deposit Account Specialist.
- c. All other project questions are to be directed to the Project Manager.
- d. There is no guarantee that a project will be approved. Regardless of the approval or non-approval of a project, all costs for processing the project must be paid.
- e. Project staff will, to the best of their ability, provide an anticipated cost to process a project. This estimate will not include Post Entitlement work, as that dollar amount is determined by the Engineer's Estimate once a project is Entitled.
  - i. Many factors impact the cost of processing a project, including the completeness and quality of a project submittal, the timeliness of required submittals, environmental issues/concerns, neighborhood issues/concerns, etc. For these reasons, staff can only provide a projected processing cost, but the ultimate cost may be higher. The applicant is responsible to pay all costs to process a project, regardless of whether or not the costs are higher than staff's initial projection.

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Applicant Signature

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Date

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Print Name & Title

**CHATTEN-BROWN & CARSTENS LLP**  
2200 PACIFIC COAST HIGHWAY  
SUITE 318  
HERMOSA BEACH, CALIFORNIA 90254  
www.cbearthlaw.com

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E-mail:  
DPC@CBCEARTHLAW.COM

September 10, 2015

Ms. Jill S. Dale  
FEMA Region IX  
Grants Program Sr. Environmental Specialist,  
1111 Broadway, Suite 1200  
Oakland, CA 94607



**Re: Comments Regarding Programmatic Environmental Assessment for  
Funding of LA-RICS towers proposed for construction in the City of  
Glendora and Elsewhere; Request for Future Notifications**

Dear Ms. Dale:

We have been retained as special counsel to the City of Glendora (City) with regard to the FEMA proposal to fund the construction of communications towers. We anticipate that three of these towers would be sited in the City of Glendora. The location and design for these communications towers, possibly at three Los Angeles County owned fire stations within City, should be coordinated with the City.

We reviewed the October 2014 Environmental Assessment and the Finding of No Significant Impacts prepared for LA-RICS and found it did not adequately address aesthetic and public safety impacts within the City.

The City was not given sufficient notice of the specifics of the proposal prior to the October 2014 Environmental Assessment. Therefore, we appreciate your attempt to involve the City among other affected jurisdictions prior to promulgating the programmatic environmental assessment.

The City has always attempted in good faith to work with the LA-RICS Joint Powers Authority to address the serious concerns with the project identified by City staff and residents. These issues will remain an ongoing source of friction unless they are satisfactorily addressed. Specifically, the areas for which particular attention is necessary are aesthetics, public safety, and potential alternative sites.

**A. Aesthetic Impacts Could Be Significant to Glendora, and Must be Mitigated.**

Aesthetic impacts must be sufficiently addressed. Because the telecommunications towers would be erected substantially taller than the surrounding residential development, they would be visible from local streets and residences. They would adversely affect that attractiveness of our community, and thus we view them as significant impacts. Federal courts have held that aesthetic concerns of nearby residents and other members of the public could constitute compelling evidence for a public agency to deny permission for a proposed tower. (*AT&T Wireless PCS v. City Council of Virginia Beach* 155 F.3d 423,430-31 (4th Cir. 1998).) While we are not proposing that FEMA would deny funding for the proposed transmission towers, we mention this case to show the seriousness of aesthetic concerns created by the towers.

For most proposed towers, including the three County fire station sites in the City, the LA-RICS EA concluded the project “would not impede any significant views from public spaces, roadways, and or existing developments in the vicinity of these LTE sites.” (EA, p. 4.7-1.) As the local jurisdiction immediately affected by the towers and most familiar with the areas surrounding them, we respectfully disagreed with this assessment. Even if the towers did not impede views, they would create large, discordant visual impacts that would be highly visible from near and far.

The EA prepared by LA-RICS stated LA-RICS would coordinate with local jurisdictions and where appropriate “stealth technology would be used to disguise the proposed monopole towers as palm trees, pine trees, flagpoles, or hose towers, or incorporated into architectural elements.” (*Ibid.*) Therefore, the EA concluded there would be no direct significant impact on aesthetic and visual resources.

However, despite our attempts to coordinate with LA-RICS in good faith to implement stealth technologies for the tower sites in the City, we have received no satisfactory response. With regard to the Programmatic EA, FEMA should ensure that procedures are in place in local jurisdictions to address mitigation of aesthetic impacts.

**B. Public Safety Impacts Could Be Significant.**

Glendora is concerned that the towers may emit radiowave/microwave emissions that are injurious to the health of citizens residing in close proximity to the towers. One tower is proposed for a site located in close proximity to a day care facility. We would appreciate being informed of any studies proving that the towers will not pose a health risk to the children attending this day care facility.

Many studies have found a correlation between exposure to electromagnetic fields and cancer. (*See, e.g., Nancy Wertheimer & Edward Leeper, Electrical Wiring*

*Configurations and Childhood Cancer*, 109 Amer. J. Of Epidemiology 273-84 (1979); L. Tomenius, *50-Hz Electromagnetic Environment and the Incidence of Childhood Tumors in Stockholm County*, 7 Bioelectromagnetics 191-207 (1986); D.A. Savitz et al., *Magnetic Field Exposure From Electric Appliances and Childhood Cancer*, 131 Amer. J. Of Epidemiology 763-73 (1990); J.R. Wilkins & Ruth Koutras, *Paternal Occupation and Brain Cancer in Offspring: A Mortality-Based Case-Control Study*, 14 Amer. J. Of Ind. Med. 299-318 (1988); K.T.S. Yao, *Microwave Radiation-Induced Chromosomal Aberrations in Corneal Epithelium of Chinese Hamsters*, 69 J. Of Heredity 409-12 (1978); Ellen Sugarman, *Warning: The Electricity Around You May Be Hazardous To Your Health*, App. A (1992) (containing extensive list of major studies).

Public health and safety are issues of great interest within our City, especially as they affect children. Therefore, we hope FEMA through the programmatic EA will take this question seriously, and work with us to address it.

**C. Alternative Locations Should be Seriously Considered for One or All of the Towers.**

Perhaps the best way to address the aesthetic and public safety impacts of the communications towers is to locate them in alternative locations within the City that would cause less severe impacts. Reasonable alternative locations available in the City that would reduce environmental impacts include Johnstone Peak, where Glendora currently has a tower for its communications, and the South Hills. These environmentally superior alternatives should be examined in an implementation of LA-RICS. Therefore, we ask that the programmatic EA ensure procedures are implemented to closely examine potential alternative sites.

**D. Coordination Efforts With State-Level Agencies Should be Clearly Explained.**

We are aware there notice was provided of the preparation of an EIR in August 2014 for the LA-RICS LMR project. (<http://www.la-rics.org/wp-content/uploads/2014/08/LARICS-LMR-EIR-NOP-20140819.pdf> .) We would like to know how the FEMA Programmatic EA review will be coordinated with this state-level EIR.

While Glendora is a member of LA-RICS, the process of environmental review to date has caused us some concern. The City of Glendora sent a letter on March 14, 2015 to the County of Los Angeles expressing concern with the review process. (Enclosure 1.)

The state level process of LA-RICS LMR implementation at the County of Los Angeles ended abruptly because of concerns raised to County elected officials. ("U.S. suspends funding for troubled L.A. County emergency system" April 3, 2015, Los

Jill S. Dale  
September 10, 2015  
Page 4

Angeles Times, <http://www.latimes.com/local/lanow/la-me-ln-emergency-radios-20150403-story.html>.) After some revision, the process apparently started again. (<http://www.latimes.com/local/lanow/la-me-ln-county-emergency-system-20150501-story.html>, "Feds approve L.A. County emergency system revisions; work can resume.")

We hope that FEMA's federal level coordination of the programmatic EA will result in greater transparency and decisions that properly involve all concerned stakeholders of this project, including the City of Glendora.

### **Conclusion.**

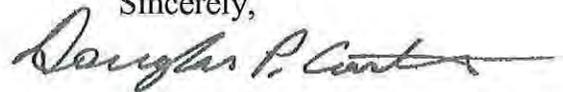
The LA-RICS project is obviously important to the future of public safety in the local region. Therefore, the City has been a supportive member of the Joint Powers Authority implementing this project and as helpful as possible in carrying it out. However, as a member of the LA-RICS Joint Power Authority, we expect a high level of consideration and coordination.

While adverse local area impacts in Glendora are of preeminent concern to us, we expect that similar concerns about impacts to constituents would be shared by a number of other jurisdictions that are members of the JPA.

Please feel free to contact City Attorney Wayne Leech or City Manager Chris Jeffers directly about this matter.

We ask that you provide us with notice of the availability of any documents or the scheduling of any public hearings related to this project.

Sincerely,



Douglas P. Carstens

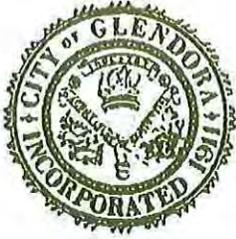
Enclosure:

City of Glendora letter of March 14, 2015 to the County of Los Angeles

Cc:

City Council, City Manager, City Attorney of Glendora  
LA RICS Special Counsel Nicole Gordon  
LA RICS General Counsel Truc L. More  
LA RICS Executive Director Patrick Mallon

**ATTACHMENT**



March 14, 2015

Honorable Michael D. Antonovich  
Los Angeles County Supervisor – 5<sup>th</sup> District  
615 E. Foothill Blvd., Suite A  
San Dimas, CA 91773

RE: LA-RICS Monopoles in the City of Glendora

Dear Supervisor Antonovich:

The City of Glendora has been engaged with LA-RICS in asking that no construction of the monopoles be undertaken at this time. This request is based on several factors:

First, LA-RICS is attempting to break the overall project of the communication infrastructure improvement into two phases in order to avoid compliance with National Environmental Policy Act (“NEPA”) which is necessary since the LTE project is funded by the Federal Government. Under both NEPA and the California Environmental Quality Act (“CEQA”), such an action is strictly prohibited.

Second, the purpose of NEPA is to identify and study issues with public involvement. Without this process the project may be misunderstood by the public and important information that needs to be addressed and mitigated may be omitted.

Third, the men and women of the Los Angeles County Fire Department have expressed serious concern that these operations may have a negative impact to their health. Our community has depended on their skills and good will for decades. In light of these health concerns, the County and its residents have the obligation to insist that the NEPA process is completed before work is begun.

Fourth, LA-RICS’ process in handling the project has been anything but inclusive of the general public. Their actions to date have demonstrated that they have been unable to manage this project successfully. We are told that they must start the project now or they will lose their federal funding. However, they have had nearly a decade of inaction or worse, incompetent action, causing the project to be under studied and over budget.



## Community Development Department

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August 26, 2015

U.S. Department of Homeland Security  
Attn: Ms. Jill S. Dale  
1111 Broadway, Suite 1200  
Oakland, CA 94607



**RE: Los Angeles Regional Interoperable Communication Systems (LA-RICS) and Land Mobile Radio (LMR) Project**

Dear Ms. Dale,

Please consider this letter as a request for more information regarding the proposed LMR project. Specifically, please provide information pertaining to the following:

1. Please provide the City of Huntington Park with a copy of the list of identifying the 116 potential sites for the LMR project.
2. Are any proposed LMR sites located within the City of Huntington Park? If so, are they proposed on private property or on public right-of-ways?
3. Please provide the City of Huntington Park with a copy of the Programmatic Environmental Assessment once it becomes available.

If you have any questions please do not hesitate to contact me at (323) 584-6250 or via email at [cluis@hpca.gov](mailto:cluis@hpca.gov).

Sincerely,

Carlos Luis  
Senior Planner

  
CITY OF RANCHO PALOS VERDES  
CITY MANAGER'S OFFICE  
ADMINISTRATION

10 September 2015



Jill S. Dale, Grants Program Sr. Environmental Specialist  
Federal Emergency Management Agency  
1111 Broadway, Ste. 1200  
Oakland, CA 94607

**SUBJECT: Scoping Comments for the Draft Programmatic Environmental Assessment for the LA-RICS Land Mobile Radio System**

Dear Ms. Dale:

The City of Rancho Palos Verdes appreciates the opportunity to comment upon the scope of the proposed Draft Programmatic Environmental Assessment for the above-mentioned project. We have previously offered comments on this proposal in response to a request for scoping comments on the Draft Environmental Impact Report (DEIR) that is being prepared for this project pursuant to CEQA. These comments are enclosed, and are hereby submitted to FEMA in response to your request for comments on the Draft Programmatic Environmental Assessment that is being prepared pursuant to NEPA.

Thank you for the opportunity to comment upon this important project. If you have any questions or need additional information, please feel free to contact me at (310) 544-5226 or via e-mail at [kitf@rpvca.gov](mailto:kitf@rpvca.gov).

Sincerely,



**Kit Fox, AICP**  
Senior Administrative Analyst

enclosures

cc: Mayor Jim Knight and Rancho Palos Verdes City Council  
Doug Willmore, City Manager  
Joel Rojas, Community Development Director

M:\Municipal Services\Emergency Communications\LA-RICS\20150910\_Dale\_PEAScopingComments.docx



23 September 2014

Nancy Yang, Project Engineer  
LA-RICS  
2525 Corporate Pl., Ste. 200  
Monterey Park, CA 91754

**SUBJECT: Scoping Comments for the Draft Environmental Impact Report for the LA-RICS Land Mobile Radio System**

Dear Ms. Yang:

The City of Rancho Palos Verdes appreciates the opportunity to comment upon the scope of the proposed Draft Environmental Impact Report (DEIR) for the above-mentioned project. We have reviewed the Notice of Preparation and Initial Study (NOP/IS), and offer the following comments on the three (3) proposed Land Mobile Radio (LMR) sites in the City, as well as general comments on the DEIR and LMR system:

U.S. Coast Guard Property at Point Vicente Park/Civic Center (Location ID: PVC)

1. The discussion of Aesthetics in the NOP/IS (p. 21) states that the project is likely to have significant adverse impacts upon scenic vistas and the visual character of the proposed LMR sites and their surroundings. The proposed PVC location would be located at a visually-prominent site surrounded by the City's civic center and a portion of its nature preserve. There also residential neighborhoods surrounding this site where ocean views would be degraded by the addition of an antenna structure and related support equipment. The addition of an antenna structure and related support equipment is also likely to degrade the character of the open space areas surrounding this site (see enclosed diagram). The City would prefer the elimination of this site from consideration in the proposed project, but failing that, the DEIR should fully evaluate the aesthetic impacts of an LMR site at this location.
2. The discussion of Biological Resources in the NOP/IS (pp. 24-25) states that the project is likely to have significant adverse impacts upon sensitive species and habitat, and that it may conflict with adopted Natural Community Conservation Plans (NCCPs). The proposed PVC location would be surrounded by the Alta Vicente Reserve of the City's Palos Verdes Nature Preserve. The nature reserve property is enrolled as a part of the City's NCCP. The City would prefer the

elimination of this site from consideration in the proposed project, but failing that, the DEIR should fully evaluate the biological resource impacts of an LMR site at this location.

3. The discussion of Cultural Resources in the NOP/IS (pp. 25-26) states that the project is likely to cause a substantial adverse change in the significance of a historical or archaeological resource. The proposed PVC location would be on the site of an existing World War II-era bunker and the remains of gun batteries at Point Vicente. The bunker and batteries are associated with Fort MacArthur in San Pedro. Furthermore, the surrounding civic center property is a former, Cold War-era Nike missile base, which includes the intact missile silos. Finally, the site would be located within a ½-mile radius of the Point Vicente Lighthouse, which is listed on the National Register of Historic Places. The City would prefer the elimination of this site from consideration in the proposed project, but failing that, the DEIR should fully evaluate the cultural resource impacts of an LMR site at this location.
4. The discussion of Hazards and Hazardous Materials in the NOP/IS (pp. 28-29) states that the project is likely to involve the handling of hazardous materials in the vicinity of a school. Each of the proposed LMR sites would include a diesel-powered back-up generator. Within a ¼-mile radius of the PVC location are the following schools:

- Peninsula Montessori School, 31100 Hawthorne Blvd.

The DEIR should fully evaluate the hazards and hazardous materials impacts of an LMR site at this location.

County "Antenna Farm" at 5741 Crestridge Road (Location ID: RHT)

5. The discussion of Aesthetics in the NOP/IS (p. 21) states that the project is likely to have significant adverse impacts upon scenic vistas and the visual character of the proposed LMR sites and their surroundings. The proposed RHT location would be located at a visually-prominent site surrounded by institutional uses and senior citizen housing, as well as a portion of the City's nature preserve. There also residential neighborhoods to the south of this site where views of the Los Angeles Basin would be degraded by the addition of an antenna structure and related support equipment. The addition of an antenna structure and related support equipment is also likely to degrade the character of the open space areas to the north of this site (see enclosed diagram). The City would prefer the elimination of this site from consideration in the proposed project, but failing that, the DEIR should fully evaluate the aesthetic impacts of an LMR site at this location. Furthermore, since there is an existing antenna structure already on this site, the DEIR should fully evaluate the feasibility of co-locating the LMR antennae and

support equipment on this existing structure, rather than installing another antenna support structure on the site.

6. The discussion of Biological Resources in the NOP/IS (pp. 24-25) states that the project is likely to have significant adverse impacts upon sensitive species and habitat, and that it may conflict with adopted Natural Community Conservation Plans (NCCPs). The proposed RHT location would abut the Vista del Norte Reserve of the City's Palos Verdes Nature Preserve. The nature reserve property is enrolled as a part of the City's NCCP. The City would prefer the elimination of this site from consideration in the proposed project, but failing that, the DEIR should fully evaluate the biological resource impacts of an LMR site at this location.
7. The discussion of Hazards and Hazardous Materials in the NOP/IS (pp. 28-29) states that the project is likely to involve the handling of hazardous materials in the vicinity of a school. Each of the proposed LMR sites would include a diesel-powered back-up generator. Within a ¼-mile radius of the RHT location are the following schools:
  - Ridgecrest Intermediate School, 28915 Northbay Dr.
  - Peninsula Community Church Preschool, 5640 Crestridge Rd.
  - Ner Tamid Preschool, 5721 Crestridge Rd.

The DEIR should fully evaluate the hazards and hazardous materials impacts of an LMR site at this location.

8. The discussion of Land Use and Planning in the NOP/IS (p. 32) states that the project is likely to have significant adverse impacts with respect to consistency with local land use and zoning regulations. A substantial portion of the RHT site is zoned "Open Space-Hazard" (OH), as depicted in the enclosed diagram. Although the exact location of the proposed antenna structure and related support equipment on this site has not been identified, they should not be located with the portion of the site zoned OH. The DEIR should fully evaluate the land use and planning impacts of an LMR site at this location.

Federal Aviation Administration Property at the Top of San Pedro Hill (Location ID: SPC)

9. The discussion of Aesthetics in the NOP/IS (p. 21) states that the project is likely to have significant adverse impacts upon scenic vistas and the visual character of the proposed LMR sites and their surroundings. The proposed SPC location would be located at a visually-prominent site at the highest point in the City and on the Palos Verdes Peninsula. There are residential neighborhoods surrounding this site where community aesthetics could be degraded by the addition of an antenna structure and related support equipment. The DEIR should fully evaluate the aesthetic impacts of an LMR site at this location. Furthermore, since there are

existing antenna structures already on this site, the DEIR should fully evaluate the feasibility of co-locating the LMR antennae and support equipment on this existing structures, rather than installing another antenna support structure on the site.

10. The discussion of Hazards and Hazardous Materials in the NOP/IS (pp. 28-29) states that the project is likely to involve the handling of hazardous materials in the vicinity of a school. Each of the proposed LMR sites would include a diesel-powered back-up generator. Within a ¼-mile radius of the SPC location are the following schools:
  - Mira Catalina Elementary School, 30511 Lucania Dr.

The DEIR should fully evaluate the hazards and hazardous materials impacts of an LMR site at this location.

#### General Comments

11. The discussion of Geology and Soils in the NOP/IS (pp. 26-27) states that the project is likely to have significant adverse impacts with respect to exposure to risk of landslides and construction on expansive soils. The entire Palos Verdes Peninsula is underlain by soil that is susceptible to landslides and/or may be characterized as expansive. The DEIR should fully evaluate the geology and soils impacts of the proposed project, and should mandate site-specific geologic and geotechnical studies prior to construction.
12. The discussion of Hydrology and Water Quality in the NOP/IS (pp. 30-31) states that the project is likely to have significant adverse impacts with respect to increased runoff from new impermeable surfaces and the possibility of fuel spills. Although the amount of new impermeable area at each LMR site is expected to be negligible, each site will also include outdoor storage of hazardous materials (i.e., a self-contained diesel back-up generator). The DEIR should fully evaluate the hydrology and water quality impacts of the proposed project, and should mandate site-specific conditions for compliance with local, State and Federal water quality regulations prior to construction.
13. The discussions of Noise and Transportation/Traffic in the NOP/IS (pp. 33-34 & 36-37) state that the project is likely to have significant construction-related temporary noise and traffic impacts upon surrounding neighborhoods. The DEIR should fully evaluate the noise and transportation/traffic impacts of the proposed project, and should mandate specific mitigation measures to address them.
14. As an alternative to the proposed project, LA-RICS should consider only installing LMR antennae and support equipment at sites where they can be co-located with existing towers or monopoles, or building-mounted using "stealth" technologies.

**Nancy Yang**  
**23 September 2014**  
**Page 5**

The City of Rancho Palos Verdes believes that such an alternative could reduce many of the adverse environmental impacts of the proposed project by minimizing and/or eliminating the need to construct numerous new antenna towers or monopoles.

15. The NOP/IS lists the City of Rancho Palos Verdes as a public agency whose approval is required for this project (p. 15). However, it has been the City's understanding up to this point that LA-RICS intends to avail itself of the County's exemption from local land use and zoning regulations. The City requests clarification of whether or not it will have the authority to review the three (3) proposed LMR sites through its own development review and building permit processes.
16. If the City of Rancho Palos Verdes elects to "opt out" of continued participation in LA-RICS, what (if any) effect would this have upon the inclusion of LMR sites in the City in the LA-RICS system? Would they be removed from the LMR project, or would they still be included whether or not the City continues to participate in LA-RICS?

Again, thank you for the opportunity to comment upon this important project. If you have any questions or need additional information, please feel free to contact me at (310) 544-5226 or via e-mail at [kitf@rpv.com](mailto:kitf@rpv.com).

Sincerely,



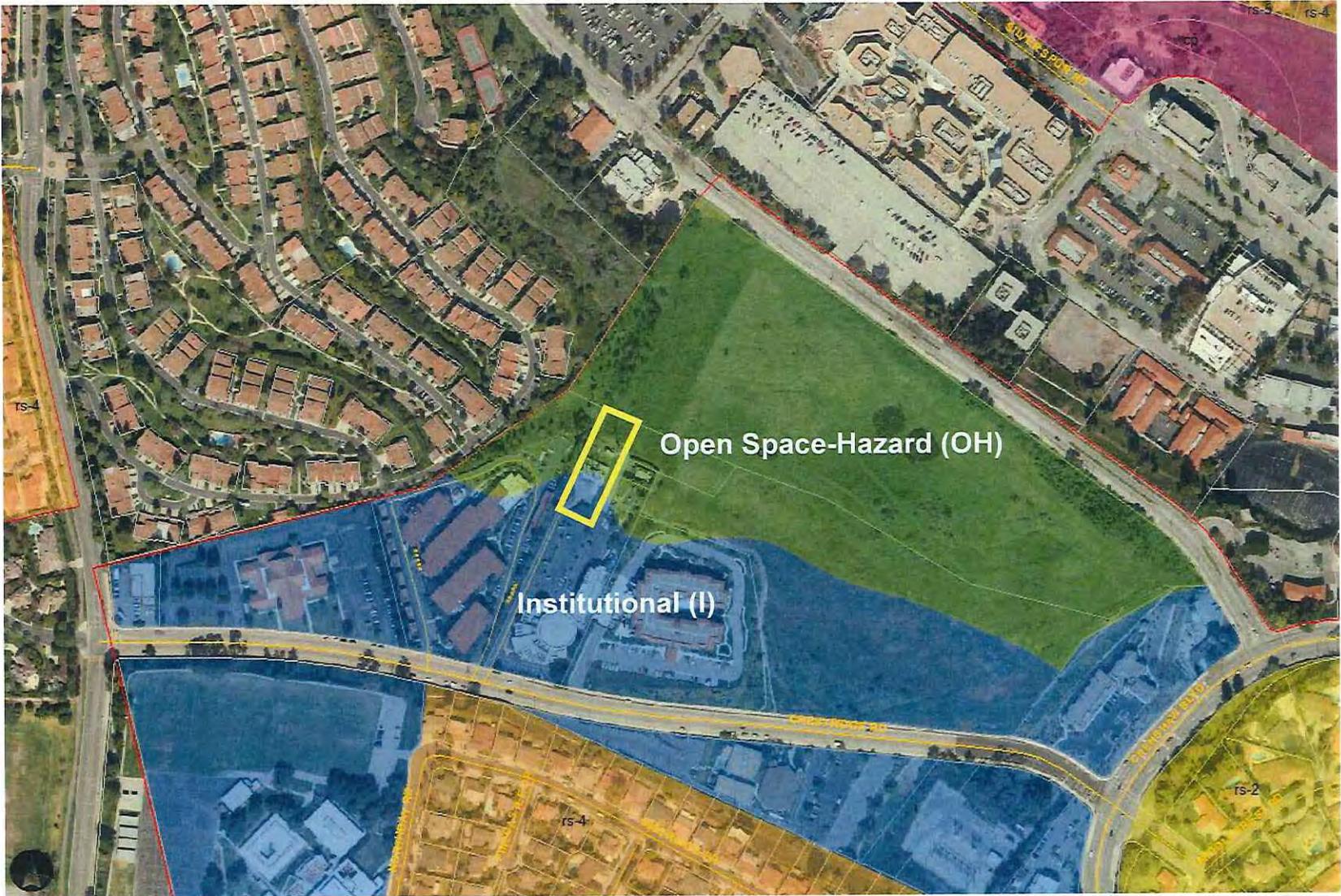
**Kit Fox, AICP**  
Senior Administrative Analyst

enclosures

cc: Mayor Jerry Duhovic and Rancho Palos Verdes City Council  
Carolynn Petru, Acting City Manager  
Joel Rojas, Community Development Director



**LMR Site ID "PVC"**  
**Surrounding Nature Preserve**



**LMR Site ID "RHT"  
Existing Zoning**



**LMR Site ID "RHT"  
Surrounding Nature Preserve**



CITY OF RANCHO PALOS VERDES  
CITY MANAGER'S OFFICE  
ADMINISTRATION

29 September 2014

Paige M. Peyton, PhD, RPA  
Jacobs Engineering  
3257 Guasti Rd., Ste. 120  
Ontario, CA 91761

**SUBJECT: Historic Resources in the Vicinity of Proposed LA-RICS LMR Sites in the City of Rancho Palos Verdes**

Dear Dr. Peyton:

The City of Rancho Palos Verdes is in receipt of your August 29<sup>th</sup> request for information about historic resources in the vicinity of the three (3) proposed LA-RICS LMR sites in the City. Please see the discussion below of the known historic resources within a ½-mile radius of these sites.

U.S. Coast Guard Property at Point Vicente Park/Civic Center (Location ID: PVC)

The Coast Guard property is surrounded by City property that contains Rancho Palos Verdes City Hall, Point Vicente Park and the Alta Vicente Nature Reserve (part of the Palos Verdes Nature Preserve). The property includes a World War II-era bunker that is still in use by the Coast Guard for communications purposes (see enclosed photos). Adjacent to the bunker are the remains of Battery 240, which once held a 6-inch coast artillery gun (<http://www.ftmac.org/Battery240.htm>). The bunker and Battery 240 are associated with Fort MacArthur in San Pedro.

Rancho Palos Verdes City Hall occupies structures and facilities that were previously part of Nike Missile Site LA-55 (<http://www.ftmac.org/lanike3.htm>). The former barracks and offices are occupied by City offices. The former fire station is now a cable television studio. The two (2) missile silos remain intact but unused; their surface is used as a City storage yard. These are all Cold War-era structures that were transferred to the City of Rancho Palos Verdes in 1977.

A roughly 5-acre portion of the surrounding City property is occupied by a farm that is leased to James Hatano. Mr. Hatano is the last of the Japanese truck farmers who once farmed much of the Palos Verdes Peninsula. He returned to the Peninsula to farm again after the Japanese internment during World War II. His farm is the last vestige of commercial agricultural use in the City.

Point Vicente Lighthouse is an active lighthouse dating from 1926 (<http://vicentelight.org>). It is listed on the National Register of Historic Places and is located within a ½-mile radius of the proposed LMR antenna site.

County "Antenna Farm" at 5741 Crestridge Road (Location ID: RHT)

The City of Rancho Palos Verdes is not aware of any historic resources within a ½-mile radius of this proposed LMR site. However, a significant portion of the area within this radius is located

**Dr. Paige M. Peyton**  
**29 September 2014**  
**Page 2**

within the jurisdiction of the City of Rolling Hills Estates. We recommend that you contact Rolling Hills Estates for assistance in identifying any potential historic resources within its jurisdiction.

David Wahba, Planning Director  
City of Rolling Hills Estates  
4045 Palos Verdes Dr. N.  
Rolling Hills Estates, CA 90274  
(310) 377-1577

Federal Aviation Administration Property at the Top of San Pedro Hill (Location ID: SPC)

The FAA site is located at the highest point of the Palos Verdes Peninsula (1,480' above MSL). The FAA site still has active Federal radar installations and commercial and government telecommunication facilities, and was previously the San Pedro Hill Air Force Station (<http://wikimapia.org/5220469/San-Pedro-Hill-Air-Force-Radar-Station>).

The City of Rancho Palos Verdes is not aware of any historic resources on or within a ½-mile radius of this proposed LMR site. However, a significant portion of the area within this radius is located within the jurisdiction of the City of Rolling Hills. We recommend that you contact Rolling Hills for assistance in identifying any potential historic resources within its jurisdiction.

Yolanta Schwartz, Planning Director  
City of Rolling Hills  
2 Portuguese Bend Rd.  
Rolling Hills, CA 90274  
(310) 377-1521

If you have any questions or need additional information, please feel free to contact me at (310) 544-5226 or via e-mail at [kittf@rpv.com](mailto:kittf@rpv.com).

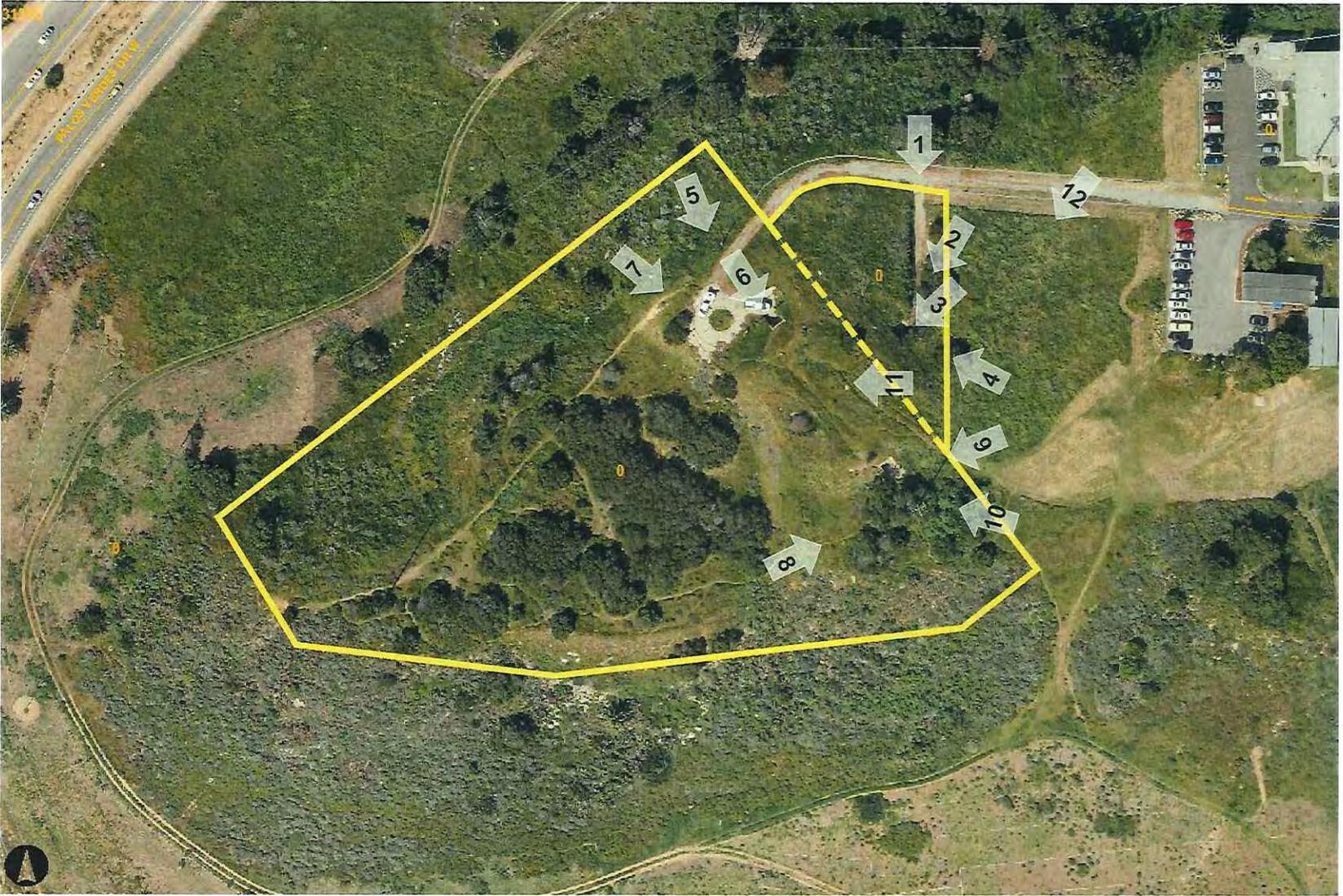
Sincerely,



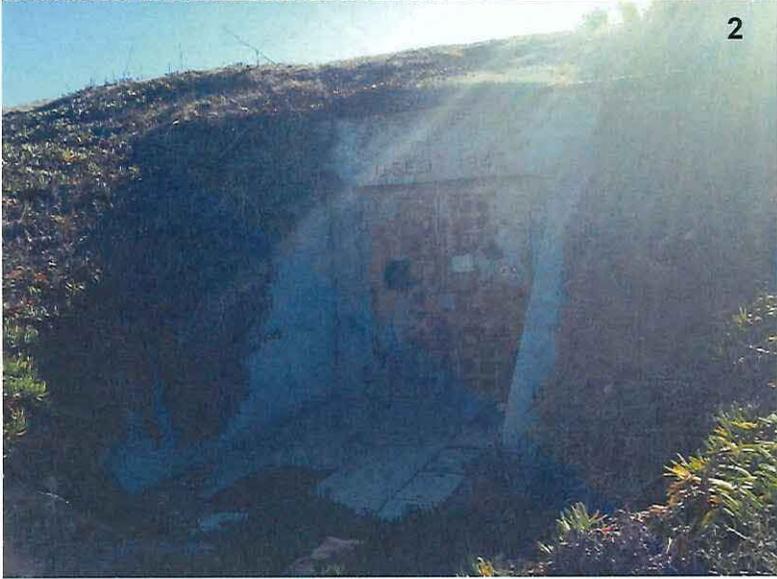
**Kit Fox, AICP**  
Senior Administrative Analyst

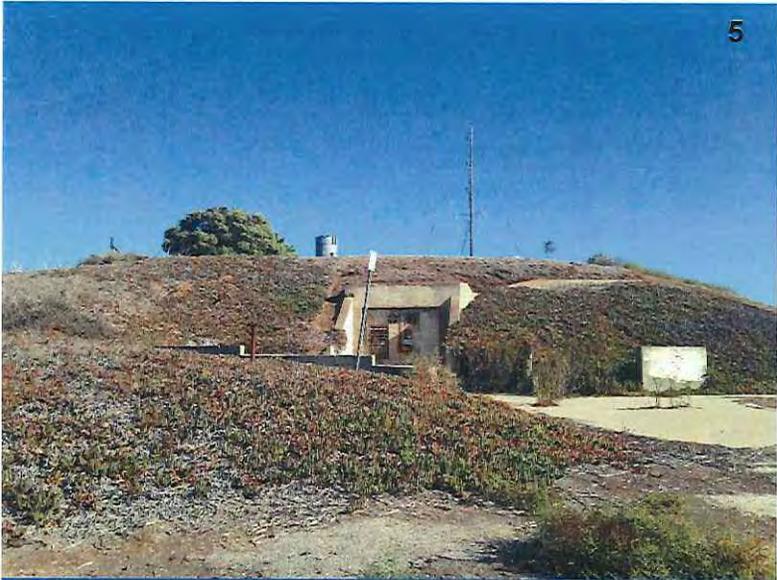
enclosures

cc: Carolynn Petru, Acting City Manager  
Joel Rojas, Director of Community Development

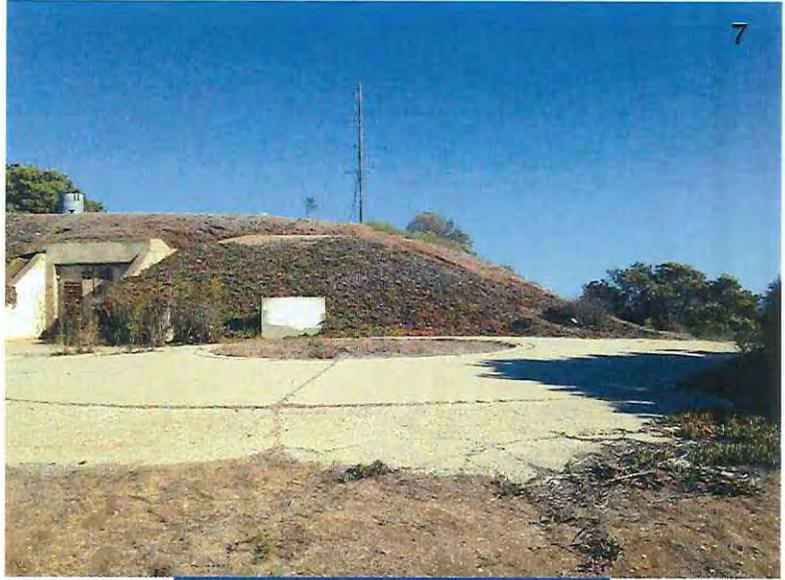


**U.S. Coast Guard Property at Upper Point Vicente  
APNs 7573-002-906 & 7573-002-912**





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8







**Dale, Jill**

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**From:** Michael Leslie <leslie@caldwell-leslie.com>  
**Sent:** Monday, September 14, 2015 6:48 PM  
**To:** Dale, Jill; Deshong, Casey  
**Cc:** Mike Bonin; Tricia Keane; John Gregory (john.gregory@lacity.org);  
FParkRogers@bos.lacounty.gov; sheila@bos.lacounty.gov; tim.pershing@asm.ca.gov;  
josh.kurpies@asm.ca.gov; andrea.kune@asm.ca.gov; Senator.Pavley@senate.ca.gov;  
Senator.Allen@senate.ca.gov; Richard.Bloom@asm.ca.gov;  
Matt.Dababneh@asm.ca.gov; edelman@smmc.ca.gov; edmiston@smmc.ca.gov;  
Rebekah.Rodriguez-Lynn@sen.ca.gov; president@hillsidefederation.org; Wendy-Sue  
Rosen; Tom R. Freeman; Eric Edmunds; John Given (johngiven@me.com);  
cheadle@smmc.ca.gov; loismark@gmail.com  
**Subject:** RE: FEMA notice under NEPA for LA-RICS: San Vicente Peak Tower  
**Attachments:** 2015-09-14 BHHA LA-RICS ltr.docx; 2015-09-14 ltr attachments.pdf

Dear Ms. Dale,

In response to FEMA's August 13, 2015 letter requesting comments by September 15, 2015 on the programmatic EIS under NEPA for the LA-RICS proposed LMR tower on San Vicente Peak in the Santa Monica Mountains, please review the attached comment letter and exhibits from the Brentwood Hills Homeowners Association (BHHA).

Please make this letter and its exhibits part of the record in this action and be sure BHHA is placed on the notice list for all meetings, studies, notice and other announcements in connection with this project.

Thank you.

**Michael R. Leslie, First Vice President**

**Brentwood Hills Homeowners Association**



**Via Email and U.S. Mail**

September 14, 2015

Jill S. Dale  
Grants Program Sr. Environmental Specialist  
1111 Broadway, Suite 1200  
Oakland, CA 94607

***RE: Los Angeles Regional Interoperable Communications System (LA-RICS) Land Mobile Radio (LMR) Project; HSGP 2010-SS-T0-0085(17651); Sub-recipient – City of Los Angeles***

Dear Ms. Dale:

I am the First Vice President of Brentwood Hills Homeowners Association (Brentwood Hills), and am writing on behalf of Brentwood Hills in response to the August 13, 2015 letter from Mr. Alessandro Amaglio from FEMA Region IX. That letter requests comments on the anticipated Programmatic Environmental Assessment for the above-referenced LMR project under the National Environmental Policy Act (NEPA), and requests comments be submitted by September 15, 2015.

Brentwood Hills represents over 450 homes in the Santa Monica Mountains above Mandeville Canyon Road north of Sunset Blvd in the Brentwood region of Los Angeles. Brentwood Hills has been instrumental in protecting open space, public access and parklands in the Santa Monica Mountains, including the Westridge-Canyonback Wilderness Park. Westridge-Canyonback Wilderness Park is part of the Santa Monica National Recreation Area, and includes Westridge Fire Road and the adjacent trails leading to San Vicente Mountain Park, which is a designated location for one of the 180-foot LMR towers proposed by LA-RICS.

The proposed San Vicente Peak LMR tower is not only within—and surrounded by—San Vicente Mountain Park and Westridge-Canyonback Wilderness Park, but it is also immediately adjacent to Topanga State Park. The Proposed LMR tower is also located within the Mulholland Scenic Parkway Specific Plan.

This proposed 180-foot LMR microwave tower is located in beautiful open space parkland that is heavily used by thousands of hikers, picnickers and mountain bikers each year. The huge tower would be an obvious eyesore for miles throughout not only the adjacent protected parklands, but also throughout West Los Angeles and the west San Fernando Valley. In addition, the tower—with its high-wattage blinking light, many microwave dishes and associated microwave radiation—would have significant environmental impacts not only on the view-sheds and surrounding scenic

Jill S. Dale  
Sept. 14, 2015

parklands, but also on wildlife, birds and the thousands of visitors that visit the park and the viewing platform that is immediately adjacent to the proposed LMR tower.

San Vicente Mountain Park is an historical interpretive site that was a NIKE Missile radar site during the Cold War. There are interpretive signs explaining the history of the Nike Missile system, the radar site and the Cold War, and the park includes picnic areas, hiking trails and a viewing platform immediately adjacent to the proposed 180-foot LMR tower. This viewing platform is heavily used by the public, with unparalleled 360-degree views stretching from Long Beach to the Pacific Ocean, the Santa Susanna and San Gabriel Mountains, Downtown LA and beyond.

In case you are unfamiliar with the location for the proposed San Vicente Peak LMR tower, here are some photographs of this beautiful site. The new 180-foot tall tower would be located next to the existing, much smaller tower next to the viewing platform you can see in these photographs:



Jill S. Dale  
Sept. 14, 2015



For comparison, here is a representation of the 180-foot LMR tower proposed for San Vicente Peak, which is located right next to the viewing platform used by thousands of people each year who visit this park:



Brentwood Hills and many other community organizations feel strongly that San Vicente Peak is an inappropriate location for the huge LMR tower that is proposed for this site. In addition, letters of concern regarding the San Vicente Peak LA-RICS tower have been written by the National Park Service and the Santa Monica Mountain Conservancy. Moreover, the Los Angeles City Council recently expressed concern over the San Vicente Peak LMR tower, and asked that an alternative location be explored by LA-RICS. I am attaching those letters of concern for your information.

Brentwood Hills urges that the San Vicente Peak location for the LA-RICS LMR tower be removed from further consideration, as the environmental impacts associated with an LMR tower at this site would be significant, unavoidable, permanent and could not be mitigated. Simply put, this park is an inappropriate location for this type of huge microwave tower.

Jill S. Dale  
Sept. 14, 2015

If the San Vicente Peak location is not immediately dropped from further consideration, Brentwood Hills strongly believes this particular location should be the subject of a separate and robust environmental analysis under both NEPA and CEQA. Given its unique location in the middle of protected state and federal parkland and within the Mulholland scenic corridor, it would be inappropriate for the proposed San Vicente Peak LMR tower to be lumped in with all of the other urban LA-RICS facilities in a single programmatic EIS or EIR.

If the San Vicente Peak LMR tower is not removed from consideration at this time—which Brentwood Hills believes would be the appropriate course of action—Brentwood Hills demands that all alternatives to the proposed San Vicente Peak LMR tower be subject to a meaningful environmental analysis, including the “no tower” alternative, alternative locations outside of protected parklands and sensitive habitat, and much smaller tower configurations.

Brentwood Hills requests that it be placed on the notice list for all public meetings, notices, letters and draft and final environmental reports.

We look forward to your thoughtful consideration of the community’s substantial concerns regarding this tower.

Sincerely,



MICHAEL R. LESLIE,  
First Vice President, Brentwood Hills Homeowners Association

Attachments

Cc: Councilman Mike Bonin, City of Los Angeles  
Supervisor Sheila Kuehl, County of Los Angeles  
State Senator Fran Pavley  
State Assemblyman Richard Bloom  
State Assemblyman Matt Dababneh  
State Senator Ben Allen  
Santa Monica Mountains Conservancy  
National Park Service  
Hillside Federation  
Interested community groups and homeowners associations  
LA-RICS

**SANTA MONICA MOUNTAINS CONSERVANCY**

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265  
PHONE (310) 589-3200  
FAX (310) 589-3207  
WWW.SMMC.CA.GOV



February 27, 2012

Bureau of Engineering  
Attention: Allan Kawaguchi, Program Manager  
City of Los Angeles Department of Public Works  
1149 South Broadway Street, Suite 820  
Los Angeles, California 90015

**San Vicente Mountain Park Proposed Communications Tower**

Dear Mr. Kawaguchi:

The Santa Monica Mountains Conservancy offers the following comments on the City's proposed San Vicente Communications Tower (proposed tower) located on City land within San Vicente Mountain Park. The Conservancy appreciates the City reaching out to interest groups to explain the proposed project. To date our staff has heard presentations on and had a chance to analyze just the proposed San Vicente tower and not the other proposed new tower locations in the Conservancy Zone including on Verdugo Peak and Mount Lukens. Comments on those additional sites shall be forthcoming. In the interim, the Conservancy is compelled to go on record at the earliest possible date to request that an Environmental Impact Report be required for the project.

It is our understanding that on February 16, 2012 your Department informed the Council offices and the community that an Environmental Impact Report (EIR) will be prepared. The Conservancy applauds that decision and welcomes the opportunity to formally comment on either the Notice of Preparation or the Draft EIR. Please send all future correspondence on the project to Paul Edelman, Deputy Director of Natural Resources and Planning at the above address.

The proposed San Vicente Mountain 180-foot-tall tower would be located in the 20,000-acre Big Wild natural area that is completely unbroken by a paved road. The Big Wild contains 10,500-acre Topanga State Park the largest park within a municipal area in the country. Dirt Mulholland Drive and many primary fire road trails meet at the general tower location within San Vicente Mountain Park. This park contains the only public restroom, water fountain, and shade structures for miles. In the not so far future, there may be public trails on the Encino Reservoir property too. In addition San Vicente Mountain

Allan Kawaguchi, Bureau of Engineering  
San Vicente Peak Communications Tower  
February 27, 2012  
Page 2

Park with its NIKE missile facility remnants and interpretive displays is a unique public resource in and of itself. In short, there are many significant public viewsheds that could be adversely impacted by the proposed tower.

Public scoping for the subject project should be required because Section 15206(b)(4)(B) of the California Environmental Quality Act guidelines reads as follows:

Section 15206 addresses projects of Statewide, Regional or Areawide Significance.

(b) The lead agency shall determine that a proposed project is of statewide, regional, or areawide significance if the project meets any of the following criteria:

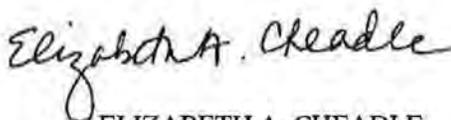
(4) A project for which an EIR and not a negative declaration was prepared which would be located in and would substantially impact the following areas of critical environmental sensitivity:

(B) The Santa Monica Mountains Zone as defined by Section 33105 of the Public Resources Code.

The great value of an EIR is that the alternatives analysis will reveal if there are ways to essentially achieve the project's primary emergency communications objectives through less visually intrusive facilities. Too much is at stake to not fully examine what options are available to decision makers.

Please direct any questions and all future correspondence to Paul Edelman of our staff at the above letterhead address and by phone at 310-589-3200 ext. 128

Sincerely,



ELIZABETH A. CHEADLE  
Chairperson



## United States Department of the Interior

NATIONAL PARK SERVICE  
Santa Monica Mountains National Recreation Area  
401 West Hillcrest Drive  
Thousand Oaks, California 91360-4207

In reply refer to:  
L76 (SAMO)

July 15, 2014

Frank Monteferrante, PhD  
Environmental Compliance Specialist  
U.S. Department of Commerce  
H.C. Hoover Building, Room 4826  
1401 Constitution Avenue, NW  
Washington, D.C. 20230

Dear Dr. Monteferrante:

The National Park Service (NPS) has reviewed the environmental assessment (EA) for the grant awarded to the Los Angeles Regional Interoperable Communications System Point Powers Authority (LA RICS Authority). The funded project proposes to develop a county-wide microwave broadband network using long-term evolution (LTE) technology to improve shared voice and data communication systems for public safety agencies throughout the greater Los Angeles area. The project proposes installation of telecommunications facilities (TF) at 231 sites, including nine proposed sites within Santa Monica Mountains National Recreation Area (SMMNRA), none of which are on NPS-owned parkland. The nine sites are Los Angeles County Fire Station 69 (LACF069), LACF071, LACF072, LACF088, LACF097, LACF099, Zuma Lifeguard Headquarters (LALG300), Lost Hills Malibu Sheriff Station (LHS), and San Vicente Peak (SVP). The TF would consist of a monopole typically 70 feet tall and approximately seven feet in diameter at the base. At sites with height restrictions, monopoles would be as short as 28 feet. Lightning rods would be attached at the apex of each monopole and microwave backhaul antennas and LTE panel antennas would be attached at varying heights along the monopole. Up to four climate-controlled equipment cabinets would house the backhaul equipment, network equipment, and backup batteries at each of the 231 LTE sites.

The National Park Service appreciates the opportunity to comment on the LA-RICS Authority project. We provide comments on the effects of private and public land development in the Santa Monica Mountains at the invitation of federal, state and local units of government with authority to prevent or minimize adverse uses. We offer the following comments. Overall, NPS concurs with the EA's impact level findings for the nine sites within SMMNRA. The proposed sites would not have negative impacts on natural, cultural, scenic, or recreational resources within SMMNRA.

Setting: The EA's description of SMMNRA and the jurisdictional setting of NPS within SMMNRA is accurate when mentioned throughout the document (Example Pages: 3.8-21, 5.4-4).

San Vicente Peak site (SVP): Appendix B (Page 2849) describes the SVP site as owned and managed by City of Los Angeles. There is an existing TF at this site that is operated by the city; however, the site is operated for public visitation by Mountains Recreation and Conservation Authority (MRCA), a local parkland management agency. The introduction description of the SVP site should be revised to reflect the parkland use of the property.

The SVP site is the only site of the nine within SMMNRA that is situated directly within parkland, the MRCA-owned Westridge Canyonback Park. The site is also within a scenic corridor, the Mulholland Scenic Parkway (Inner Corridor) as noted in Appendix B, Section 3.8 (Page 2854). Section 3.7, however, notes the site is not within a locally designated scenic corridor. This inconsistency should be corrected. The parkland setting should also be described in Section 3.7 Aesthetic and Visual Resources (Page 2854).

The EA notes that, in visually sensitive areas, the monopole height may be reduced to as short as 28 feet. At this location, the Nike Missile lookout platform is a popular scenic overlook. The lookout platform provides 360-degree views across parkland toward the ocean, as well as toward downtown Los Angeles, San Fernando Valley, and SMMNRA to the west. The site is also contiguous with MRCA-owned Westridge Canyonback Park. NPS recommends the proposed monopole be no taller than the height of the platform so that the TF would not obstruct the 360-degree views.

Coastal Commission jurisdiction: Projects in cities and unincorporated county areas without certified Local Coastal Programs are still permitted by both the local jurisdiction and must also obtain a Coastal Development Permit separately from Coastal Commission. Reference to the process on Page 3.7-6 is unclear on the jurisdiction of Coastal Commission, but is correctly indicated in later paragraphs (Pages. 3.8-5, 3.8-6).

Oat Mountain site: Table 4.12-1 (Page 4.12-2) describes the facility on Oat Mountain as being within SMMNRA. Oat Mountain is not within SMMNRA; therefore, please remove the reference to SMMNRA.

Thank you for the opportunity to comment. If you have questions, please call Melanie Beck at (805)370-2346.

Sincerely,

  
for David Szymanski  
Superintendent

cc: Joe Edmiston, Executive Director, Santa Monica Mountains Conservancy  
Craig Sap, Superintendent, Angeles District, State Department of Parks and Recreation  
Clark Stevens, District Manager, Resource Conservation District of the Santa Monica Mountains

P.O. Box 27404  
Los Angeles, CA 90027  
323-663-1031  
[president@hillsidefederation.org](mailto:president@hillsidefederation.org)  
[www.hillsidefederation.org](http://www.hillsidefederation.org)



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Don Andres

Elizabeth A. Cheadle, Chairperson  
Santa Monica Mountains Conservancy  
Ramirez Canyon Park  
5750 Ramirez Canyon Road  
Malibu, CA 90265

February 25, 2012

Bel Air Knolls Property Owners  
Bel Air Skycrest Property Owners  
Bel Air Ridge Association  
Benedict Canyon Association  
Brantwood Residents Coalition  
Canyon Back Alliance  
Crests Neighborhood Assn.  
Franklin Ave./Hollywood Bl. West  
Franklin Hills Residents Assn.  
Highlands Owners Assn.  
Hollywood Dell Civic Assn.  
Hollywood Heights Assn.  
Hollywoodland Homeowners  
Holmby Hills Homeowners Assn.  
Kagel Canyon Civic Assn.  
Laurel Canyon Assn.  
Lookout Mountain Alliance  
Los Feliz Improvement Assn.  
Mt. Olympus Property Owners  
Mt. Washington Homeowners All.  
Nichols Canyon Assn.  
N. Beverly Dr./Franklin Canyon  
Oak Forest Canyon Assn.  
Outpost Estates Homeowners  
Pacific Palisades Residents Assn.  
Residents of Beverly Glen  
Roscomare Valley Assn.  
Shadow Hills Property Owners  
Sherman Oaks HO Assn.  
Studio City Residents Assn.  
Sunset Hills Homeowners Assn.  
Tarzana Property Owners Assn.  
Torreyson Flynn Assn.  
Upper Mandeville Canyon  
Whitley Heights Civic Assn.

Re: Item #12(a), San Vicente Peak Telecommunications Tower

Dear Ms. Cheadle:

The Federation of Hillside and Canyon Associations, Inc., established in 1952 and representing thirty-four homeowner and resident associations spanning the Santa Monica Mountains, supports the request by the Santa Monica Mountains Conservancy that an Environmental Impact Report be prepared for the San Vicente Peak Telecommunications Tower Project, item #12(a) on the SMMC February 27, 2012 agenda.

On February 1, a presentation on the San Vicente Peak Communications Tower Project was made by UltraSystems, LAFD, LAPD, BOE, and the Mayor's office. Members of the Hillside Federation raised concerns about the impacts of this massive tower on the Mulholland Scenic Parkway, open space, miles of recreational trails, and questioned whether less impactful options could be explored. After full discussion on the issue, the Hillside Federation voted to support a full EIR and that the Mulholland Design Review process be followed in the manner mandated by the Mulholland Scenic Parkway Specific Plan, which is part of the City of Los Angeles General Plan.

These processes will assure that reasonable alternatives are considered and that the selected alternative meets the Project's safety objectives and will have the minimum impact on the surrounding environment and neighbors.

Sincerely,

*Marian Dodge*

Marian Dodge, President

CHAIRPERSONS EMERITUS  
Shirley Cohen  
Jerome C. Daniel  
Patricia Bell Hearst  
Alan Kishbaugh  
Gordon Murley  
Polly Ward

cc: Allan Kawaguchi, Bureau of Engineering

CHAIRMAN IN MEMORIAM  
Brian Moore



February 25, 2012

Santa Monica Mountains Conservancy  
Ramirez Canyon Park  
5750 Ramirez Canyon Road  
Malibu, CA 90265

**Re: San Vicente Peak Project Concerns / Support for Item 12(a) Comment Letter**

Dear Santa Monica Mountains Conservancy:

I am writing on behalf of Bel Air Skycrest Property Owners' Association (BASPOA) to express our community's strong support for item 12(a) on Monday night's agenda, a comment letter regarding the proposed San Vicente Peak Communication Tower Project. BASPOA believes that it is really important that this project follow proper Mulholland Design Review Board (MDRB) and California Environmental Quality Act (CEQA)-mandated processes, the latter including an Environmental Impact Report (EIR) and Public Scoping.

The residential community of Bel Air Skycrest lies on the south side of Mulholland, one mile west of the Sepulveda Pass/405 Freeway. This is an extremely high-risk fire area and, due to limited access, is a particularly vulnerable and challenging area in the event of any kind of emergency situation. So our residents are very concerned about the issue of emergency communication that this tower is meant to address. However, we also place a high value on the ecology of our precious Santa Monica Mountains and on the historic and rustic character of the 1971-designated *Mulholland Scenic Parkway*, and we want these protected.

San Vicente Peak is designated as both a Prominent Ridge and a Major Vista Point in the Mulholland Scenic Parkway Specific Plan. Clearly, the proposed project will have a significant impact on the mountains' and parkway's visual character/aesthetic—and will bring many other impacts as well. But what is still not clear from the PowerPoint presentations and Photoshop mock-ups is the exact nature and degree of all these impacts on the Mulholland Scenic Parkway and surrounding communities, including our own, as well as on the area's various recreational sites and trails.

We need assurance that: 1) the chosen alternative represents the best of all possible solutions, balancing emergency needs with preservation of our city's precious natural resources, and that 2) the impacts of this alternative are being fully analyzed and mitigated. This kind of assurance can only come through full and proper process.

According to the Mulholland Scenic Parkway Specific Plan, the proposed communication tower must be looked at with regard to:

- ◆ maximum preservation and enhancement of the parkway's outstanding and unique scenic features and resources
- ◆ compatibility of land uses with the parkway environment
- ◆ ensuring that the design and placement of buildings and other improvements preserve, complement and/or enhance views from Mulholland Drive
- ◆ preservation of the existing residential character of areas along and adjoining the right-of-way
- ◆ preservation of the existing ecological balance
- ◆ protection of prominent ridges, streams, and environmentally sensitive areas
- ◆ a review process of all projects which are visible from Mulholland Drive to assure their conformance to the purposes and development standards contained in the Specific Plan...

Bel Air Skycrest Property Owners' Association therefore joins with the Federation of Hillside and Canyon Associations, Brentwood Residents Coalition, Brentwood Community Council, Save Our Mountains, Inc., Canyon Back Alliance, Brentwood Hills Homeowners Association, Upper Mandeville Canyon Association, Mandeville Canyon Association, and others in requesting **MDRB review**, an **EIR** and **Public Scoping**. We thank the Santa Monica Mountains Conservancy for addressing this issue at its meeting, and we urge the Conservancy to vote to support sending the staff-recommended letter.

Respectfully,

*Lois Becker*

Lois Becker, Community Liaison  
Bel Air Skycrest Property Owners' Association

# **CANYON BACK ALLIANCE** A NON-PROFIT PUBLIC BENEFIT CORPORATION

WWW.CANYONBACK.ORG ~ INFO@CANYONBACK.ORG

February 26, 2012

Santa Monica Mountains Conservancy  
Ramirez Canyon Park  
5750 Ramirez Canyon Road  
Malibu, California 90265

## **Re: San Vicente Mountain Peak Proposed Communications Tower**

Dear Chairperson Cheadle:

Canyon Back Alliance (CBA) is a non-profit public benefit corporation dedicated to preserving public access to recreational trails in the Santa Monica Mountains. CBA is writing in strong support of the proposed letter concerning the City of Los Angeles' Communications Tower Project, Item No. 12(a) on the February 27, 2012 SMMC Agenda. We ask, however, that the draft letter be modified to request that the City of Los Angeles conduct Public Scoping for the San Vicente Peak Communications Tower Project prior to preparing a draft EIR.

We appreciate that the draft letter calls for an EIR to assess the project's potential impacts and determine whether less intrusive alternatives are available. The environmental sensitivity of this project is clear. The proposed Communications Tower is 180-feet high, painted orange and white, with a 700-watt red light flashing at the rate of 40 times per minute, and would be situated atop San Vicente Peak in the Santa Monica Mountains. The tower would rise from the former Nike Missile Tracking Station above Mandeville Canyon and Encino Hills, at the crossroads and within view of the popular Westridge, Canyonback and Sullivan Canyon public trails, and atop a Prominent Ridge within the inner corridor of the Mulholland Scenic Parkway. These public trails are contiguous with the 20,000 acre urban wilderness park known as the "Big Wild." The adverse aesthetic impacts of a 180-foot tower atop one of the highest mountain peaks in the area, commanding 360-degree views of these protected public trails and the residential areas within the natural scenic environment are obvious. Vicente Peak is also the location of the San Vicente Mountain Park where the SMMC has transformed the Nike Missile Tracking Station into an interpretive center focusing on the history of the Cold War. We applaud SMMC Staff for drafting the proposed letter requesting full environmental review and encourage the Board to approve the letter.

# **CANYON BACK ALLIANCE** A NON-PROFIT PUBLIC BENEFIT CORPORATION

WWW.CANYONBACK.ORG ~ INFO@CANYONBACK.ORG

To assure that the environmental review process is effective, we ask that the letter be modified to request that the City also conduct a public scoping meeting. Under CEQA, the lead agency must call at least one “scoping meeting” for a project of “statewide, regional or areawide significance.” Public Resources Code, Sec. 21083.9(a); CEQA Guidelines, Section 15082(c)(1). The San Vicente Peak Communications Tower Project is of “statewide, regional, or areawide significance” as those terms are defined under the CEQA Guidelines. Section 15206(b) of the CEQA Guidelines provides that:

“The lead agency shall determine that a proposed project is of statewide, regional, or areawide significance if the project meets any of the following criteria: . . . (4) A project for which an EIR and not a negative declaration was prepared which would be located in and would substantially impact the following areas of critical environmental sensitivity: . . . (B) The Santa Monica Mountains Zone as defined by Section 33105 of the Public Resources Code.”

The San Vicente Peak Communications Tower Project would substantially impact the Santa Monica Mountains Zone by disturbing the natural viewshed from public recreational trails and properties within the Santa Monica Mountains. For that reason, Public Scoping for this project would not only be prudent, it is legally mandated under CEQA.

We therefore ask that the excellent draft letter be modified to include a request that the City conduct Public Scoping prior to preparation of a draft EIR.

Sincerely,



Tom Freeman, President

## Hoyt, James

---

**From:** Drew Steinberg <drew.steinberg@lacity.org>  
**Sent:** Thursday, September 17, 2015 4:15 PM  
**To:** Pat Mallon; Odenthal, Chris; Hoyt, James; Rykaczewski, Carl; Nancy Yang  
**Cc:** Patricia Whelan; Ahee Han; Alisa Finsten  
**Subject:** Fwd: Sierra Club Scoping Letter Received (San Vicente Peak)

Below is the emailed letter from Sierra Club re:LA-RICS LMR project, specifically the San Vicente Peak site, in response to FEMA's scoping letter. The other letters will come as attachments in a separate email shortly.

Thank you,

Drew

---

**From:** MaryAnn Webster [mailto:[mawebster1984@sbcglobal.net](mailto:mawebster1984@sbcglobal.net)]  
**Sent:** Tuesday, September 15, 2015 3:29 PM  
**To:** Dale, Jill <[jill.dale@fema.dhs.gov](mailto:jill.dale@fema.dhs.gov)>; Deshong, Casey <[Casey.Deshong@fema.dhs.gov](mailto:Casey.Deshong@fema.dhs.gov)>  
**Subject:** RE: LOS ANGELES REGIONAL INTEROPERABLE COMMUNICATIONS SYSTEM

SIERRA CLUB LOS ANGELES CA 9/15/15

TO: Jill S. Dale, Grants Program Sr. Environmental Specialist

FROM: Santa Monica Mountains Task Force, Sierra Club

RE: Los Angeles Regional Interoperable  
Communications System (LA-RICS) Land Mobile  
Radio (LMR) project: HSGP 2010-SS-tp-0085(17651

Dear Ms. Dale,

The Santa Monica Mountains Task Force(SMMTF) of the Sierra Club is sending this letter with our comments and concerns re the above-referenced LMR project under the National Environmental Policy Act (NEPA).

The SMMTF of the Sierra Club has been instrumental for many years in protecting open space, public access and parklands in the Santa Monica Mountains and the Santa Monica National Recreation Area. Our environmental protection area includes San Vicente Mountain Park. It includes Westridge-Canyonback Wilderness Park, Westridge Fire road and the adjacent trails leading to San Vicente Mountain Park.

San Vicente Mountain Park is a designated location for one of the 180-foot LMR towers proposed by LA-RICS. The proposed tower is within and surrounded by San Vicente Mountain Park and Westridge-Canyonback Wilderness Park. It is also adjacent to

Topanga State Park and located within the Mulholland Scenic Parkway Specific Plan.

**We strongly object to this proposed location.**

To install this gigantic 180-foot LMR microwave on San Vicente Peak would be a visual blight for miles in all directions, on protected parklands throughout the Santa Monica Mountains. Significant environmental impacts would be not only on the viewshed and surrounding scenic parklands, but also on wildlife, birds and the year-round visitors to the park and the viewing platform and its unparalleled 360-degree views in all directions, of Los Angeles, Long Beach, the Pacific Ocean and the Santa Susanna and San Gabriel Mountains. The proposed LMR tower would be located next to the much smaller tower next to the viewing platform-- already in place.

The Santa Monica Mountains Task Force of the Sierra Club, along with many environmental groups, feels strongly that San Vicente Peak is a hugely inappropriate location for constructing and installing this mammoth tower, now and in the future.

The proposed location is within protected state and federal parkland and within the Mulholland scenic corridor.

The suggested location negatively affects protected parklands, visual viewsights, and sensitive habitat.

We request that the San Vicente Peak LMR tower be removed from consideration at this time. We also request that an alternate location be chosen that does not impact parklands, the environment, and the public.

Cordially, Mary Ann Webster, Chair

Santa Monica Mountains Task Force, Sierra Club

3435 Wilshire Bl.,(#660) Los Angeles, CA. 90010

The SMMTF is submitting objections to the proposed 180-foot tower that would located in San Vicente Park.



**Drew Steinberg**  
**Public Safety**  
**Office of Mayor Eric Garcetti**

**o. (213) 978-0686      c. (213) 221-5300**

**Dale, Jill**

---

**From:** Marian Dodge <president@hillsidefederation.org>  
**Sent:** Tuesday, October 27, 2015 10:15 AM  
**To:** Nancy.Yang@LA-RICS.org; Dale, Jill  
**Subject:** LA-RICS LMR on San Vicente Peak  
**Attachments:** pastedGraphic.pdf; LA-RICS San Vicente tower 102715.pdf

Dear Ms. Yang and Ms. Dale,

Attached is a letter from the Hillside Federation opposing the placement of an LA-RICS LMR on San Vicente Peak. Please add it to you file and include the Hillside Federation on any and all notification lists for the project.

Thank you very much.

Best regards,

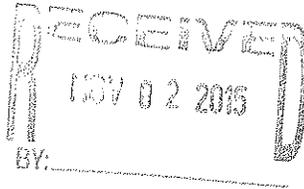
Marian Dodge, President  
Federation of Hillside and Canyon Associations  
[www.hillsidefederation.org](http://www.hillsidefederation.org)

P.O. Box 27404  
Los Angeles, CA 90027  
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Brentwood Hills Homeowners  
Brentwood Residents Coalition  
Cahuenga Pass Property Owners  
Canyon Back Alliance  
CASM-SFV  
Crests Neighborhood Assn.  
Franklin Ave./Hollywood Bl. West  
Franklin Hills Residents Assn.  
Highlands Owners Assn.  
Hollywood Dell Civic Assn.  
Hollywood Heights Assn.  
Hollywoodland Homeowners  
Holmby Hills Homeowners Assn.  
Kagel Canyon Civic Assn.  
Lake Hollywood HOA  
Laurel Canyon Assn.  
Lookout Mountain Alliance  
Los Feliz Improvement Assn.  
Mt. Olympus Property Owners  
Mt. Washington Homeowners All.  
Nichols Canyon Assn.  
N. Beverly Dr./Franklin Canyon  
Oak Forest Canyon Assn.  
Oaks Homeowners Assn.  
Outpost Estates Homeowners  
Rancho Verdugo Estates  
Residents of Beverly Glen  
Roscomare Valley Assn.  
Save Goldwater Canyon!  
Save Sunset Blvd.  
Shadow Hills Property Owners  
Sherman Oaks HO Assn.  
Silver Lake Heritage Trust  
Studio City Residents Assn.  
Sunset Hills Homeowners Assn.  
Tarzana Property Owners Assn.  
Torreyson Flynn Assn.  
Upper Mandeville Canyon  
Upper Nichols Canyon NA  
Whitley Heights Civic Assn.

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Steve Twining  
CHAIRS IN MEMORIUM  
Brian Moore  
Polly Ward



Nancy Yang  
Project Engineer  
LA-RICS  
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Monterey Park CA 91754

Jill S. Dale  
Grants Program Sr. Environmental Specialist  
FEMA  
1111 Broadway, Suite 1200  
Oakland, CA 94607

October 27, 2015

Re: **RE: Los Angeles Regional Interoperable Communications System (LA-RICS) Land Mobile Radio (LMR) Project on San Vicente Peak HSGP 2010-SS-T0-0085(17651); Sub-recipient – City of Los Angeles**

Dear Ms. Yang and Ms. Dale:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 45 resident and homeowner associations spanning the Santa Monica Mountains. The Federation's mission is to protect the property and quality of life of its over 200,000 constituents and to conserve the natural habitat and appearance of the hillside and mountain areas in which they live.

The Hillside Federation strongly objects to the proposed 180-foot LMR microwave tower proposed by LA-RICS for San Vicente Peak in the Santa Monica Mountains. This huge proposed tower would be located right in the middle of San Vicente Mountain Park and Westridge-Canyonback Wilderness Park, which are both immediately adjacent to Topanga State Park. These parks are key parts of the Santa Monica Mountains National Recreation Area, which is one of the nation's largest wilderness parks located in the heart of a major metropolitan area. As such, these parklands and the Santa Monica Mountains National Recreation Area are precious resources that should not be negatively impacted by a huge communications facility of this nature.

San Vicente Peak, the proposed tower location, is located within the Mulholland Scenic Parkway Specific Plan, in the heart of San Vicente Mountain Park. This park is an historical interpretive site that formerly was a NIKE Missile radar site during the Cold War. There are interpretive signs explaining the history of the Nike Missile system, the radar site and the Cold War, and the park includes picnic areas, hiking trails and a viewing platform immediately adjacent to the proposed 180-foot LMR tower. This viewing platform is heavily used by the public, and has unparalleled 360-degree views stretching from Long Beach to the Pacific Ocean and Channel Islands, and from the Santa Monica and Santa Susanna Mountains to the San Gabriel Mountains, Downtown Los Angeles, and beyond.

This huge proposed tower would be an obvious eyesore for miles throughout not only the adjacent protected parklands, but also throughout West Los Angeles and the San Fernando Valley. In addition, the tower—with its high-wattage blinking lights, many microwave dishes, and associated microwave radiation—would have significant environmental impacts not only on the view-sheds and surrounding scenic parklands, but also on wildlife, birds, and the thousands of visitors that come to the park and use the viewing platform immediately adjacent to the proposed LMR tower.

The Hillside Federation joins many other community organizations strongly opposed to siting such a tower at the San Vicente Peak location. Letters of concern regarding the San Vicente Peak LA-RICS tower have been written by the National Park Service and the Santa Monica Mountains Conservancy. Moreover, the Los Angeles City Council recently expressed its concern over the San Vicente Peak LMR tower. As part of the approval to use City sites for the placement of the LA-RICS equipment, the City Council adopted, and the Mayor approved, a motion that the LA-RICS LMR location at San Vicente Peak be re-evaluated and a less intrusive alternative be considered.

The Hillside Federation urges that the San Vicente Peak LA-RICS LMR tower site be removed from further consideration, as the environmental impacts associated with an LMR tower at this site would be significant, unavoidable, permanent, and could not be mitigated. Simply put, given its unique location in the middle of protected state and federal parkland and within the Mulholland Scenic Corridor, San Vicente Mountain Park is an inappropriate location for this type of huge microwave tower and communications facility. Further, it is entirely inappropriate for the proposed San Vicente Peak LMR tower to be lumped in with the other urban LA-RICS facilities in a single Program EIR under CEQA or in a single Programmatic EIS under NEPA.

If the San Vicente Peak LMR tower is not removed from consideration, the location must be the subject of a separate and robust environmental analysis under both NEPA and CEQA. The Federation demands that all feasible alternatives to the proposed San Vicente Peak LMR tower be subject to a meaningful state and federal environmental analysis, including the "no tower" alternative, alternative locations outside of protected parklands and sensitive habitat, and much smaller tower configurations.

Finally, the Hillside Federation requests that it be placed on the notice list for all public meetings, notices, letters, environmental assessment documents, and draft and final environmental reports.

We look forward to your thoughtful consideration of the community's substantial concerns regarding this tower.

Sincerely,

*Marian Dodge*  
Marian Dodge