

**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



Agenda Item 9(a) SMMC 11/2/15
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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  
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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:

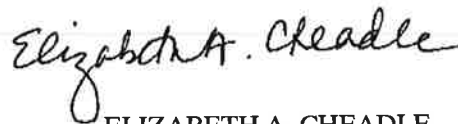
(4) A project for which an EIR and not a negative declaration was prepared which would be located in and would substantially impact the following areas of critical environmental sensitivity:

(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).

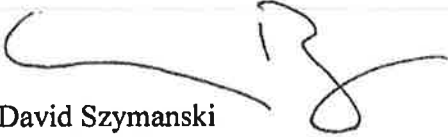
The EA notes that, in visually sensitive areas, the monopole height may be reduced to as short as 28 feet. At this location, the Nike Missile lookout platform is a popular scenic overlook. The lookout platform provides 360-degree views across parkland toward the ocean, as well as toward downtown Los 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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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  
Brentwood 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 MEMORIUM  
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