



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