

SANTA MONICA MOUNTAINS CONSERVANCY

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November 2, 2015

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**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 - San Vicente (Peak) Mountain Park**

Dear Mses. Yang and Dale:

The Santa Monica Mountains Conservancy (Conservancy) last commented on the LA-RICS proposed communications tower at San Vicente Mountain Park in a February 27, 2012 letter. Our staff also submitted an email to LA-RICS that our agency concurred with the July 15, 2014 letter submitted by the National Park Service (NPS) with respect to the proposed LTE tower at the site. NPS has made the responses to its letter available to the Conservancy.

Given these comments, the Conservancy is disappointed that LA-RICS is now proposing a new 180-foot-tall Land Mobile Radio LMR tower with numerous microwave dishes, antennas and other communications equipment on the same site, which would have even greater impacts than the previously proposed 85-foot-tall monopole tower for the LTE system. The proposed location of the LMR tower on a knoll within the middle of the park immediately puts the base of that tower at elevations 40 feet above Mulholland Drive, 30 feet above the main facility area of the park, and approximately 15 feet below the popular cold war era radar tower that has long been used as a unique public observation platform. Therefore the proposed 180-foot-tall LMR structure would be 220 feet (twenty-two story building height) above Mulholland Drive and 165 feet above the observation deck of the view tower. The proposed LMR tower covered with microwave dishes would be within 125 horizontal feet from Mulholland Drive and just 100 feet from the observation platform.

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The NPS letter notes that the Environmental Assessment (EA) indicates that in visually sensitive areas that monopole (tower) height for the LA-RICS should be reduced to as short as 28 feet. This should also be true with respect to the proposed LMR tower (if an LMR tower were to be located at this location at all, which the Conservancy opposes). Without question the San Vicente Peak proposed tower site is the most visually, environmentally and recreationally sensitive location in the entire LA-RICS site profile. Multiple other letters to date have addressed the sensitivity of the location. In short, the site is within the most significant natural mountain area within the City of Los Angeles boundary. The proposed project would have potentially significant visual impacts from multiple public viewing areas. The proposed tower would also have other potentially significant impacts on recreational activities, land use and biological and ecological resources, including potential impacts on the public being able to use the popular viewing platform adjacent to the tower and its communications and microwave equipment. The construction of the proposed 180-foot-tall LMR tower and related power, communications and support facilities would also have potentially significant environmental impacts that need to be fully analyzed in the Draft Environmental Impact Report (DEIR) for the site.

The NPS letter makes the recommendation that any new tower at this site not exceed the view height from the radar platform. Adding the height of a person to the approximate 15 foot height advantage of the platform, any tower taller than approximately 20 feet would impair the view from the platform. Existing antennae and attachments already partially impair this view. It is critical that the DEIR analyze the potential cumulative viewshed deterioration from multiple public viewing areas in near proximity to the proposed project.

The Conservancy opposes a LMR LA-RICS tower at the San Vicente Mountain Park location, and urges that the DEIR fully analyze the “no project” alternative and other alternative locations for a tower at this sensitive location. The Conservancy also recommends the DEIR fully analyze a project alternative for any LA-RICS related structures at San Vicente Mountain Park not to exceed 28 feet in total height (which is consistent with the EA’s lowest minimum height allowance). We understand that the design of such an alternative project may require a series of LMR sites at other locations and potentially greater construction and operation expense. However, decision makers need to be presented with options on how

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to protect this unique park and reduce visual and other environmental impacts in a regionally significant viewshed and its contiguous parklands. The DEIR must address specifically how the reduction of LA-RICS sites has created budget flexibility to make such impact reduction designs more economically feasible.

The project description may be deficient if the project includes lighting on the upper three-fourths of the proposed tower. The potential visual impacts of tower lighting must be addressed in the DEIR.

The construction of any type of vertical structure creates known and unknown opportunities to add communication equipment over time. The DEIR must address the potential for additional commercial and public communication equipment to be mounted on the proposed tower. If the San Vicente Peak tower does not exceed 28 feet in height as recommended in the Conservancy DEIR alternative, then the impacts of future additional mounted equipment would be reduced. On the other hand, any future mounted equipment on a monopole exceeding 28 feet in height could still have potential significant adverse visual and other environmental impacts. Any project greater than 28 feet in height must include a mitigation measure that strictly prohibits the mounting of any additional equipment not addressed the EIR.

To the best of our knowledge LA-RICS has not conducted extensive signal coverage studies to really understand the advantages and deficiencies of antennae at different locations and heights. Without extensive coverage studies for the San Vicente Peak area, how can the DEIR make any conclusions about tower height and location sufficiency?

It is common knowledge that antennae space on tower is in wide demand. As a result entities constructing antennae towers often create height and space for future use and revenue. Because of the sensitivity of the subject area, the potential for future added uses to any towers must be thoroughly addressed and mitigated in the EIR.

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

Sincerely,

LINDA PARKS
Chairperson