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Via Email (DraftEIR.Hotline@la-rics.org)

Los Angeles Regional Interoperable Communications System
Joint Powers Authority
c/o Nancy Yang
2525 Corporate Place, Suite 100
Monterey Park, CA 91754

February 25, 2016

Re: ***Los Angeles Regional Interoperable Communications System (LA-RICS)
Land Mobile Radio (LMR) Project; SCH #2014081025***

Dear LA-RICS Board:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 45 resident and homeowner associations with approximately 250,000 constituents spanning the Santa Monica Mountains. Thank you for the opportunity to provide public comment on the Draft Environmental Impact Report (DEIR) for the above-captioned project.

The Federation is aware of a DEIR comment letter submitted by our member organization, Brentwood Hills Homeowners Association, dated February 20, 2016. We have had an opportunity to review the letter, which we incorporate by reference, and join Brentwood Hills in its numerous concerns regarding the adequacy of the project's DEIR.

In particular, we share Brentwood Hills' following concerns that:

- Potentially significant environmental impacts associated with proposed towers within and adjacent to the Santa Monica Mountains National Recreation Area and Topanga State Park, some on or near significant ridgelines, within the Coastal Zone, or near scenic highways and corridors, have not been identified or adequately analyzed. Existing facilities at some of these sites are considerably smaller than the proposed towers, and thus cannot justify a finding of no significant impact.
- The DEIR fails to analyze the "no project" alternative on a site-by-site basis.
- The DEIR fails to analyze alternative tower heights, technologies, and configurations.
- The DEIR fails to properly analyze the environmental impacts of the proposed towers on wilderness area resources, including visual, aesthetic, biological, parkland, and ecological resources, among others.

- If all potentially significant impact areas are properly analyzed, some parkland locations will likely be deemed inappropriate for inclusion in the proposed project due to significant unavoidable impacts, including the Green Mountain (GRM) and Topanga Peak (TOP) sites.

Thank you for your consideration of the Hillside Federation's concerns.

Sincerely,

Marian Dodge

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