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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.

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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