

**FINAL
ENVIRONMENTAL IMPACT REPORT
FOR THE
LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS)
LAND MOBILE RADIO (LMR) SYSTEM**



Prepared for:

LA-RICS Joint Powers Authority
2525 Corporate Place, Suite 200
Monterey Park, CA 91754

MARCH 2016

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1.0 Introduction

1.1 Project Descriptions and Location

The Los Angeles Regional Interoperable Communications System (LA-RICS) Joint Powers Authority (Authority) proposes to establish a Land Mobile Radio (LMR) system as a communications system for first responders in Los Angeles County. The LMR system would consist of installation, operation, and maintenance of LMR facilities at up to 90 sites. The Authority is considering a total of 95 sites to provide alternate locations if some sites are determined to be unviable and are removed from further consideration during site feasibility assessments, system engineering, geotechnical evaluations, the permitting process, and/or in lease agreement discussions with the property owner. Of these 94 sites, the Authority has previously determined that 40 sites are statutorily exempt from California Environmental Quality Act (CEQA) under Public Resources Code section 21080.25. A Draft Environmental Impact Report (EIR) was prepared to analyze the remaining 54 sites that did not qualify for the CEQA statutory exemption. Although potential LMR sites are located in Los Angeles County and adjacent portions of Orange and San Bernardino counties, the sites evaluated in the Draft EIR (i.e., the sites not subject to statutory CEQA exemption) are all located within Los Angeles County with the exception of one site in San Bernardino County. Each of the 54 sites analyzed in the Draft EIR would be equipped with whip and microwave antennas mounted on either (a) an existing building, or on an existing or modified monopole or lattice tower, or (b) a new monopole or new lattice tower. Supporting infrastructure to be developed at each site would include equipment racks to be located inside a new or existing equipment shelter or building, a new up to 85-kilowatt backup generator with up to 1,500-gallon integrated diesel fuel tank, and supporting interconnections for fiber and electrical service.

A more detailed description of the project and the alternatives considered is provided in Chapter 2.0 of the Draft EIR.

1.2 Public Review Process for the Draft EIR

The Authority published a Notice of Availability (NOA) for the Draft EIR on January 11, 2016, initiating a 45-day public review and comment period that ended on February 25, 2016. The NOA was published on the LA-RICS website (<http://www.la-rics.org/wp-content/uploads/2016/01/LA-RICS-LMR-DEIR-NOA-FINAL.pdf>). The availability of the Draft EIR and the dates of public meetings were advertised in the following newspapers:

- *Antelope Valley Press*
- *La Opinión*
- *Los Angeles Wave*
- *Long Beach Press-Telegram*
- *Los Angeles Daily News*
- *Los Angeles Times*

- *Santa Clarita Valley Signal*
- *San Gabriel Valley Tribune*

Public meetings were hosted on the following dates and locations:

Monday, January 25, 2016, 6:30 p.m.

Walnut Senior Center, Assembly Room
21215 La Puente Road, Walnut, CA 91789

Tuesday, January 26, 2016, 6:30 p.m.

Canoga Park Branch Library, Meeting Room
20939 Sherman Way, Canoga Park, CA 91303

Wednesday, January 27, 2016, 6:30 p.m.

Culver City Veterans Memorial Building, Multipurpose Room
4117 Overland Ave., Culver City, CA 90230

Thursday, January 28, 2016, 6:30 p.m.

Jane Reynolds Activity Center, Activity Room
716 Oldfield St., Lancaster, CA 93534

Tuesday, February 2, 2016, 6:30 p.m.

Peck Park Community Center, Auditorium
560 N. Western Ave., San Pedro, CA 90732

Tuesday, February 16, 2016, 4:00 p.m.

Catalina Country Club, Dining Room
1 Country Club Drive, Avalon, CA 90704

The format for each public meeting was the same. The meeting started with introductions of team members present at the meeting. A short presentation provided an overview of LA-RICS, the proposed LMR system, the CEQA process and the contents of the Draft EIR, and methods for providing comments on the Draft EIR. The meeting concluded with an open house where the public could talk one-on-one with project team members to ask questions or gain a better understanding of the project and the locations of proposed LMR sites. Although the meeting format allowed for conversation with the project team, the presentation directed that only written comments to the Draft EIR would be considered. Comment forms were provided at the public meetings. Completed comment forms could be submitted during the meeting or mailed to the Authority.

The Draft EIR was available for review at the following locations and on the LA-RICS website at <http://www.la-rics.org/wp-content/uploads/2016/01/LA-RICS-LMR-DEIR-January-2016.pdf>.

Acton Agua Dulce Library
33792 Crown Valley Road
Acton, CA 93510

Angelo M. Iacoboni Library
4990 Clark Ave.
Lakewood, CA 90712

Azusa City Library
729 N. Dalton Ave.
Azusa, CA 91702

Avalon Public Library
215 Sumner Ave.
Avalon, CA 90704

Canoga Park Branch Library
20939 Sherman Way,
Canoga Park, CA 91303

Castaic Library
27971 Sloan Canyon Road
Castaic, CA 91384

James S. Thalman Chino Hills Branch Library
14020 City Center Drive
Chino Hills, CA 91709

Lancaster Library
601 W. Lancaster Blvd.
Lancaster, CA 93534

Los Angeles Public Library Central Library,
Science, Technology & Patents Department
630 W. Fifth St.
Los Angeles, CA 90071

Los Angeles Regional Interoperable
Communications System Headquarters Building
2525 Corporate Place, Suite 100
Monterey Park, CA 91754

Malibu Library
23519 Civic Center Way
Malibu, CA 90265

Pasadena Public Library
285 E. Walnut St.
Pasadena, CA 91101

Peninsula Center Library
701 Silver Spur Road
Rolling Hills Estates, CA 90274

West Hollywood Library
625 N. San Vicente Blvd.
West Hollywood, CA 90069

Westlake Village Library
31220 Oak Crest Drive
Westlake Village, CA 91361

Wrightwood Public Library
6011 Pine St.
Wrightwood, CA 92397

In accordance with CEQA Guidelines §15088, the Authority, as Lead Agency for the Proposed Project, has reviewed and evaluated written comments submitted during the public review period regarding the LMR Project.

The CEQA Guidelines, §15088, "Evaluation of Response to Comments," states:

- a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.
- b) The lead agency shall provide a written proposed response to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report.

- c) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.
- d) The response to comments may take the form of a revision to the draft EIR or may be a separate section in the final EIR. Where the response to comments makes important changes in the information contained in the text of the draft EIR, the lead agency should either:
 - 1) Revise the text in the body of the EIR, or
 - 2) Include marginal notes showing that the information is revised in the response to comments.

No significant changes to the data and analysis contained in the Draft EIR have been required as a result of the comments received during this response process. The responses provided herein clarify, amplify, elaborate, and make minor modifications to the Draft EIR. The Draft EIR remains adequate and complete; therefore, recirculation per CEQA §15088.5 is not required. This Final EIR will be presented to the Authority for certification.

In Chapter 4 of this Final EIR, the Authority has elected, as appropriate, to revise the Draft EIR text where necessary to address errata or update the EIR with information gained in the Responses to Comments document.

CEQA Guidelines §15088 addresses a Lead Agency's responsibilities in responding to comments. The Guidelines require, among other things, that the Lead Agency provide a good faith, reasoned analysis in response to significant environmental issues raised, particularly when the Lead Agency's position is at variance with the objections and recommendations raised by commenters. §15088 does not require an individual response to each comment letter and does not prevent the Authority from responding to comments by way of a summary or comprehensive response that may apply to several individual remarks in comment letters.

Public Resources Code §21091(d)(1) requires that the Authority, as Lead Agency, consider any comments on the proposed Draft EIR that are received within the public review period. As previously discussed, six public meetings were held; however, no public comments were submitted at these meetings; and no additional environmental issues were raised at the meetings that had not been addressed in the Draft EIR. The Authority received 74 comment letters and/or emails on the Draft EIR from public agencies, organizations, and individuals during the public review period.

CEQA Guidelines §15204(a) provides that:

In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and need not provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

CEQA Guidelines § 15204(c) further advises:

Reviewers should explain the basis for their comments and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to §15064, an effect shall not be considered significant in the absence of substantial evidence.

CEQA Guidelines § 15204(d) states:

Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility.

CEQA Guidelines § 15024(e) states:

This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or the lead agency to reject comments not focused as recommended by this section.

Each comment received on the Draft EIR is included in its entirety in this document. Each letter or email containing comments on the Draft EIR is followed by responses corresponding to comments submitted in the letter or email. Comments have been arranged herein under the following categories: State Agency Comments, Local/Regional Jurisdiction Comments, Non-Governmental Organization Comments, and Public Comments. No new significant environmental impacts are raised by the submitted comment letters.

1.3 Organization of This Document

This Final EIR briefly summarizes the public review and notification process for the Draft EIR, which are key steps in the CEQA process. Chapter 2.0 of this document identifies the persons and agencies who offered comments on the Draft EIR and how those comments are listed and addressed in Chapter 3.0.

Chapter 4.0 provides the revisions to the Draft EIR that have been made for the Final EIR in response to these comments. This includes corrections or additions identified by Authority staff.

The Draft EIR is incorporated by reference into this Final EIR. Chapter 4.0 includes revisions to the Draft EIR in tracked changes (underline/strikethrough) format.

2.0 Agencies and Persons Commenting on the Draft EIR

During the 45-day review and comment period, 71 written comment submissions were received from state, regional, and local agencies; non-governmental organizations; and the public. The submissions varied, some consisting of a single comment while some included more than one individual comment. Responses to comments received are provided in Chapter 3.0. Comment responses are organized in the order listed below.

2.1 State Agency Comments

One letter was received from a state agency (SA). This letter is referenced in Table 2.1-1.

Table 2.1-1: State Agency Comment Letters

Letter	Commenter	Date	Pages
SA-1	Santa Monica Mountains Conservancy	February 25, 2016	12 – 17

2.2 Local/Regional Agency Comments

Thirteen letters were received from agencies with local or regional (LR) jurisdiction. These letters are referenced in Table 2.2-1.

Table 2.2-1: Local/Regional Agency Comment Letters

Letter	Commenter	Date	Pages
LR-1	Antelope Valley Air Quality Management District	January 21, 2016	18 – 20
LR-2	City of Agoura Hills	February 24, 2016	21 – 37
LR-3	City of Beverly Hills	February 25, 2014	38 – 46
LR-4	City of Chino Hills	February 25, 2016	47 – 49
LR-5	City of El Segundo	February 23, 2016	50 – 52
LR-6	City of Glendora	February 19, 2016	53 – 57
LR-7	City of Industry	January 26, 2016	58 – 60
LR-8	City of Rancho Palos Verdes	February 24, 2016	61 – 65
LR-9	City of Rolling Hills	February 12, 2016	66 – 68
LR-10	City of Rolling Hills Estates	January 13, 2016	69 – 71
LR-11	City of Signal Hill	February 25, 2016	72 – 86
LR-12	South Coast Air Quality Management District	February 19, 2016	87 – 89

2.3 Non-governmental Organization Comments

Three comment letters were received from non-governmental organizations (NGOs). These letters are referenced in Table 2.3-1.

Table 2.3-1: Non-governmental Organization Comment Letters

Letter	Commenter	Date	Pages
NGO-1	Brentwood Hills Homeowners Association	February 20, 2016	90 - 101
NGO-2	Federation of Hillside and Canyon Associations, Inc.	February 25, 2016	102 - 108
NGO-3	Catalina Island Conservancy	February 25, 2016	109 - 145

2.4 Public Comments

Fifty-five comment letters were received from the public. These letters are referenced in Table 2.4-1.

Table 2.4-1: Public Comment Letters

Letter	Commenter	Date	Page
Public-1	Armendariz, Alex and Bayer, Daniel	February 19, 2016	146
Public-2	Armstead, Willie B.	February 19, 2016	151
Public-3	Brainard, S. C.	February 19, 2016	152
Public-4	Caldin, Ralph	February 19, 2016	153
Public-5	Clements, Corey	February 19, 2016	154
Public-6	Chen, Woody	February 19, 2016	155
Public-7	Collins, Joseph Jr.	February 19, 2016	156
Public-8	Cree, Janet	February 19, 2016	157
Public-9	Dew, Leslie	February 19, 2016	158
Public-10	Ferrell, Claire and Walter H.	February 19, 2016	159
Public-11	Ferrera-Garcia, Jason	February 19, 2016	160
Public-12	Hebish, Nady	February 19, 2016	161
Public-13	Heeb, Patrick	February 19, 2016	162
Public-14	Jones, Reid	February 19, 2016	163
Public-15	Joy, Ikonija S.	February 19, 2016	164
Public-16	Kent, Diane	February 19, 2016	165
Public-17	Kent, Jonathan	February 19, 2016	166
Public-18	Khem, S.	February 19, 2016	167
Public-19	Lamee, S.	February 19, 2016	168
Public-20	Llamas, S.	February 19, 2016	169
Public-21	Lauer, Grant	February 19, 2016	170
Public-22	Lim, Tony	February 19, 2016	171
Public-23	Loomis, M. and Michelle	February 19, 2016	172
Public-24	Lu, Jun	February 19, 2016	173
Public-25	McCutchen, Quinn and Quintan, Jane	February 19, 2016	174

Table 2.4-1: Public Comment Letters

Letter	Commenter	Date	Page
Public-26	Olweny, Catherine	February 19, 2016	175
Public-27	Rosenthal, Melissa	February 19, 2016	176
Public-28	Shahid, J.	February 19, 2016	177
Public-29	Simmons, Linda	February 19, 2016	178
Public-30	Simmons, Sanford	February 12, 2016	179
Public-31	Steese, Martha A.	February 19, 2016	180
Public-32	Torreblanca, Jose and Kiva	February 19, 2016	181
Public-33	Virga, Bonnie	February 19, 2016	182
Public-34	Warot, Albert and Warot, J.	February 19, 2016	183
Public-35	Name Illegible 2489 Eastwind Way, Signal Hill, CA 90755	February 19, 2016	184
Public-36	Name Illegible 2499 Eastwind Way, Signal Hill, CA 90755	February 19, 2016	185
Public-37	Name Illegible 2501 Hillcrest Street, Signal Hill, CA 90755	February 19, 2016	186
Public-38	Name Illegible 2511 Hillcrest Street, Signal Hill, CA 90755	February 19, 2016	187
Public-39	Name Illegible 2521 Hillcrest Street, Signal Hill, CA 90755	February 19, 2016	188
Public-40	Name Illegible 2530 Hillcrest Street, Signal Hill, CA 90755	February 19, 2016	189
Public-41	Name Illegible 2541 Hillcrest Street, Signal Hill, CA 90755	February 19, 2016	190
Public-42	Name Illegible 2580 Hillcrest Street, Signal Hill, CA 90755	February 19, 2016	191
Public-43	Name Illegible 2591 Hillcrest Street, Signal Hill, CA 90755	February 19, 2016	192
Public-44	Name Illegible 2013 Promontory Drive, Signal Hill, CA 90755	February 19, 2016	193
Public-45	Name Illegible 2304 Promontory Drive, Signal Hill, CA 90755	February 19, 2016	194
Public-46	Name Illegible 2313 Promontory Drive, Signal Hill, CA 90755	February 19, 2016	195
Public-47	Name Illegible 2336 Promontory Drive, Signal Hill, CA 90755	February 19, 2016	196
Public-48	Name Illegible 2377 Promontory Drive, Signal Hill, CA 90755	February 19, 2016	197
Public-49	Name Illegible 2377 Promontory Drive, Signal Hill, CA 90755	February 19, 2016	198
Public-50	Name Illegible 2341 Stanley Avenue, Signal Hill, CA 90755	February 19, 2016	199
Public-51	Name Illegible 2229 Westwind Way, Signal Hill, CA 90755	February 19, 2016	200



Table 2.4-1: Public Comment Letters

Letter	Commenter	Date	Page
Public-52	Name Illegible 2240 Westwind Way, Signal Hill, CA 90755	February 19, 2016	201
Public-53	Fernando, Shan	February 23, 2016	202
Public-54	Simmons, Matthew.	February 12, 2016	203
Public-55	Yedidsion, E.	February 25, 2016	207



3.0 Written Comments and the Draft EIR and Responses to Comments



Comment Letter SA-1



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Mr. Paul Edelman, Deputy Director
Natural Resources and Planning
Santa Monica Mountains Conservancy
5750 Ramirez Canyon Road
Malibu, California 90265

Dear Mr. Edelman:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the Santa Monica Mountains Conservancy on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy


Attachment



Comment Letter SA-1

STATE OF CALIFORNIA—THE NATURAL RESOURCES AGENCY EDMUND G. BROWN, JR., Governor

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



February 25, 2016

Ms. Nancy Yang
Los Angeles Regional Interoperable Communications System
Joint Power Authority
2525 Corporate Place, Suite 100
Monterey Park, California 91754

**LA-RICS, Land Mobile Radio Project
Draft Environmental Impact Report SCH #2014081025**

Dear Ms. Yang:

1 | The Santa Monica Mountains Conservancy (Conservancy) offers comments and recommendations on the Draft Environmental Impact Report (DEIR) for the Los Angeles Regional Interoperable Communications System (LA-RICS) Land Mobile Radio Project (LMR). The Conservancy is the principal State planning agency for the Santa Monica Mountains. The subject DEIR does not adequately analyze project alternatives which would reduce or eliminate the significant adverse impacts of the proposed project to public visual resources on public lands. The DEIR is deficient under the California Environmental Quality Act (CEQA) for these omissions.

2 | The DEIR fails to adequately analyze the “Environmentally Superior Alternative” with respect to each specific tower location in the Santa Monica Mountains. The Environmentally Superior Alternative section only lists alternative sites for some of the LMR sites being analyzed. The Environmental Impact Report (EIR) will remain deficient until its analysis of the Environmentally Superior Alternative includes a thorough examination of a range of feasible alternatives for each proposed tower location within the Santa Monica Mountains. This discussion of feasible alternatives must provide decision makers with a clear picture of how adverse impacts to public viewshed could be reduced by use of alternative tower heights or antenna configurations at all visually sensitive locations. It should also include an analysis of how the LA-RICS project as a whole would be affected if an individual tower is not constructed at such visually sensitive locations. This includes locations within the viewsheds of public parklands and public trails, on significant ridgelines, and near scenic highways and corridors.

3 |

4 | The proposed Green Mountain (GRM) tower on Temescal Canyon Fire Road is of particular concern due to its unprecedented high visibility from State parkland and public trails. The Site Summary Impact Analysis of this tower location (page 4-569)

Comment Letter SA-1

Ms. Nancy Yang
LA-RICS, Land Mobile Radio Project
Draft Environmental Impact Report SCH #2014081025
February 25, 2016
Page 2

4 | erroneously concludes that the proposed LRM tower would not result in significant visual impacts due to the existing facility at the subject site. However, the existing structures at the proposed GRM site are significantly shorter than the proposed 180-foot lattice tower. As proposed, construction of the GRM tower would result in unmitigable significant adverse impacts to public visual resources. The DEIR is deficient for failing to address these impacts, and for failing to identify feasible alternatives for this project site.

Please send further correspondence regarding this project to me at the above letterhead address, or contact me by phone at 310-589-3200, ext. 128, or by e-mail at edelman@smmc.ca.gov. Thank you for your time and consideration.

Sincerely,



PAUL EDELMAN
Deputy Director
Natural Resources and Planning

Responses to Comment Letter SA-1

The Authority appreciates the Santa Monica Mountains Conservancy's comments on the Draft Environmental Impact Report (EIR) dated February 25, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: Comment 1: The Subject DEIR does not adequately analyze project alternatives which would reduce or eliminate the significant adverse impacts of the proposed project to public visual resources on public lands. The DEIR is deficient under the California Environmental Quality Act for these omissions.

Response to Comment 1: The Authority explored numerous options for providing LMR coverage to the Santa Monica Mountains area. The Authority conducted a candidate site search in the area to identify potential sites that provided coverage to areas that could not be covered by other planned sites. For several sites located in the Santa Monica Mountains area, alternate sites are identified in the Draft EIR. Section 2.3 of the Draft EIR identifies that sites ENT, LACFCP08, and TOP are alternates to each other and sites H-69B and SPN are alternates to each other. Out of the sites in these two groups, only one site would be constructed from each group. For the remaining sites in the Santa Monica Mountains (sites CPK, ENC1, GRM, LACF072, LEPS, PWT, and ZHQ), no other viable alternate sites were identified that could provide coverage for the area.

Comment 2: The DEIR fails to adequately analyze the "Environmentally Superior Alternative" with respect to each specific tower location in the Santa Monica Mountains. The Environmentally Superior Alternative section only lists alternative sites for some of the LMR sites being analyzed. The Environmental Impact Report (EIR) will remain deficient until its analysis of the Environmentally Superior Alternative includes a thorough examination of a range of feasible alternatives for each proposed tower location within the Santa Monica Mountains.

Response to Comment 2: The Authority prepared the Draft EIR in accordance with CEQA and the CEQA Guidelines, PRC Section 21000 et seq. and 14 CCR Section 15000 et seq., respectively. The Authority has analyzed a range of alternatives, taking in to account feasibility and alternative locations consistent with CEQA Guidelines Section 15126.6 (f). As described in Draft EIR Section 2.5, the environmentally superior alternative is the No Project Alternative. Where the environmentally superior alternative is the No Project Alternative, CEQA Guidelines Section 15126.6(e)(2) requires identification of an environmentally superior alternative among the other alternatives. As discussed in response to Comment #1, for all but two groups of sites in the Santa Monica Mountains, only the proposed site could provide coverage for the area and meet project objectives. For the two groups of sites where alternatives have been identified (sites H-69B and SPN; and sites TOP, ENT, and LACFCP08) Section 2.5 of the EIR identifies the environmentally superior alternative.

Please see response to comment #3 regarding the feasibility of alternatives for each of the proposed tower locations in the Santa Monica Mountains.

Responses to Comment Letter SA-1

Comment 3: This discussion of feasible alternatives must provide decision makers with a clear picture of how adverse impacts to public viewshed could be reduced by use of alternative tower heights or antenna configurations at all visually sensitive locations. It should also include an analysis of how the LA-RICS project as a whole would be affected if an individual tower is not constructed at such visually sensitive locations. This includes locations within the viewsheds of public parklands and public trails, on significant ridgelines, and near scenic highways and corridors.

Response to Comment 3: The EIR provides a thorough evaluation and disclosure of the impacts of the project at each site. Detailed impact analysis for each site is provided in Draft EIR Chapter 4. A detailed analysis of the aesthetic impacts was conducted for sites, including impacts to viewsheds of public parklands, trails, significant ridgelines and scenic highways and corridors. This includes all 12 sites within the Santa Monica Mountains and described in detail in Chapter 4 [CPK (discussed at Draft EIR, Pg. 4-296), ENC1 (Pg. 4-372), ENT (Pg. 4-411), GRM (Pg. 4-566), H-69B (Pg. 4-643), LACF072 (Pg. 4-799), LACFCP08 (Pg. 4-837), LEPS (Pg. 4-989), PWT (Pg. 4-1371), SPN (Pg. 4-1563), TOP (Pg. 4-1720), and ZHQ (Pg. 4-2026)].

For sites that would require new towers or monopoles (see Draft EIR Table 2.1-2), site specific analysis is generally based on maximum heights unless otherwise noted; up to 70 feet with an additional 15-foot lightning rod for monopoles and up to 180 feet with an additional 15-foot lighting rod. Analyzing maximum tower heights provides a conservative analysis that discloses the maximum visual impacts that could result from tower construction. Final design of the system will occur if the project is approved. At that time, tower heights would be optimized based on the final system design. Some sites would be constructed exactly or nearly exactly as they are described in the Draft EIR, but the elements would be no higher or larger than analyzed. Other sites may be designed to a shorter height if additional site information or system requirements found during later design stages made this feasible. Other reasons for a change in height could include (but are not limited to) items such as subsurface constraints for foundation depths, compliance with FAA requirements, or coastal consistency issues. At this time, it would be speculative to identify which sites might ultimately accommodate a reduced tower height.

In response to the comment that the EIR should analyze how the LA-RICS project as a whole would be affected if an individual tower is not constructed, the project site locations have been proposed based on their ability to meet the project objectives set forth in Draft EIR section 2.2. This is true in each of the geographic locations served by the sites identified in the Draft EIR, including those in the Santa Monica Mountains. Not constructing one or more of the individual towers proposed within the Santa Monica Mountains would result in a failure to meet these objectives. Specifically, within that geographic area there would be:

- no day-to-day communications made available for first and second responders
- no interoperability among member agencies and mutual aid providers
- no support of communications with federal state and local agencies in emergencies
- no improvement of emergency communications
- no additional capacity created or replacement of aging infrastructure that meets current public safety requirements

Responses to Comment Letter SA-1

- no ability to increase separation of antennas on support structures to reduce interference
- no provision of increased frequency flexibility to increase system coverage or capacity
- no ability to transition from existing T-Band (where it exists) to 700 MHz systems.

The sites proposed in the Santa Monica Mountains provide coverage to serve population centers, transportation corridors, and areas of highest wildland fire, among other concerns. Physical, land use, and other constraints to development within these areas of concern within the Santa Monica Mountains substantially limit suitable sites that serve these areas, hence eliminating the availability of alternatives in many locales. The ultimate selection of which sites will be constructed will be determined based on consideration of the public comment on the Draft EIR, as well as ultimate site feasibility during final system design.

Comment 4: The proposed Green Mountain (GRM) tower on Temescal Canyon Fire Road is of particular concern due to its unprecedented high visibility from State parkland and public trails. The Site Summary Impact Analysis of this tower location (page 4-569) erroneously concludes that the proposed LRM tower would not result in significant visual impacts due to the existing facility at the subject site. However, the existing structures at the proposed GRM site are significantly shorter than the proposed 180-foot lattice tower. As proposed, construction of the GRM tower would result in unmitigable significant adverse impacts to public visual resources. The DEIR is deficient for failing to address these impacts, and for failing to identify feasible alternatives for this project site.

Response to Comment 4: The site-specific project description and visual impact analysis for Site GRM beginning at page 4-568 of the Draft EIR considered, among other factors, the bulk and scale of the existing built landscape of the site and the site's location within Topanga State Park along the heavily traveled Temescal Ridge Trail Road. At Site GRM the Draft EIR identifies that hikers on the Temescal Ridge Trail would be the most likely affected by construction of site GRM. Due to the isolated nature of this site, it is not readily visible from vantage points other than the trail. Views of nature from the trail are currently intruded upon by existing human-made linear structures, such as power poles and powerlines, as well as intermittent views of the existing structures on the proposed site. Due to the area's rolling topography, views of the existing site are limited and intermittent. The analysis in Chapter 4 describes how the proposed facilities would not perceptibly change the scenic vista due to the presence of existing towers, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista. The existing visual character and quality of the site and its surroundings are impacted by the presence of an existing site and tower. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. In addition, although the height of the new tower was analyzed at up to 180 feet, the actual height could be less following detailed system design. Based on the methodology in Section 3.1.4, the impact analysis in the Draft EIR shows that construction would result in a less than significant visual impact on aesthetics at Site GRM. No changes have been made to the Draft EIR.



Comment Letter LR-1



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Bret Banks, Executive Director
Antelope Valley Air Quality Management District
43301 Division Street, Suite 206
Lancaster, California 93535-4649

Reference: AV0116/007

Dear Mr. Banks:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the Antelope Valley Air Quality Management District] on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

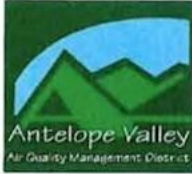
Sincerely,

A handwritten signature in blue ink that reads "Susy Orellana Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment

Comment Letter LR-1



Antelope Valley Air Quality Management District
43301 Division St., Suite 206
Lancaster, CA 93535-4649
Phone 661.723.8070

Bret Banks, Executive Director
In reply, please refer to AV0116/007

January 21, 2016

Nancy Yang, Project Engineer
LA-RICS Joint Powers Authority
2525 Corporate Place, Suite 100
Monterey Park, CA 91754

RE: Notice of Availability of a Draft Environmental Impact Report for the proposed Land Mobile Radio
Project-SCH #2014081025

Ms. Yang:

The Antelope Valley Air Quality Management District (District) has received the Notice of Availability for a Draft Environmental Impact Report for the proposed Land Mobile Radio System.

1 The District requires the proposed project comply with all requirements outlined in District Rule 403, Fugitive Dust. Receipt of a District approved Dust Control Plan is required prior to initiating any ground preparation activities if individual sites are greater than 5 acres. During the construction phase, all disturbed areas should be stabilized so that no visible fugitive dust leaves the property line and does not impact traffic or neighboring residents. Upon completion of the project, all disturbed surface areas must meet the definition of a stabilized surface, as defined in Rule 403.

2 In addition, the proponent will need to obtain District permits for any miscellaneous process equipment that may not be exempt under District Rule 219 including, but not limited to Internal Combustion Engines with a manufacture's maximum continuous rating greater than 50 brake horsepower.

Thank you for the opportunity to review this planning document. If you have any questions regarding the information presented in this letter please contact me at (661) 723-8070 ext. 2 or bbanks@avaqmd.ca.gov.

Sincerely,



Bret Banks
Executive Director

BB/bjl

Responses to Comment Letter LR-1

The Authority appreciates the Antelope Valley Air Quality Management District’s comments on the Draft Environmental Impact Report (EIR) dated January 21, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: The District requires the proposed project comply with all requirements outlined in District Rule 403, Fugitive Dust. Receipt of a District approved Dust Control Plan is required prior to initiating any ground preparation activities if individual sites are greater than 5 acres. During the construction phase, all disturbed areas should be stabilized so that no visible fugitive dust leaves the property line and does not impact traffic or neighboring residents. Upon completion of the project, all disturbed surface areas must meet the definition of a stabilized surface, as defined in Rule 403.

Response to Comment 1: Ground preparation activities would not exceed 5,000 square feet (less than 0.12 acre) at any LMR site; therefore, the requirement for a dust control plan for sites greater than five acres would not apply to the project. However, Best Management Practices consistent with the AVAQMD *List of Implementation Measures to Reduce PM pursuant to Health and Safety Code 39614(d)* (see Draft EIR Section 3.2.4 *Project Impacts*) would be implemented as part of the project, and these include measures to limit fugitive dust emissions, such as:

- Apply water to the construction site as needed to comply with Rule 403 of the applicable air quality management district.
- Enclose or water down exposed dirt storage piles.
- Minimize the disturbed area and preserve vegetation to the maximum extent possible.
- Phase construction activities, to the extent possible, to reduce disturbed areas and time of exposure.

Comment 2: In addition, the proponent will need to obtain District permits for any miscellaneous process equipment that may not be exempt under District Rule 219 including but not limited to Internal Combustion Engines with a manufacture's maximum continuous rating greater than 50 brake horsepower.

Response to Comment 2: A discussion of the Antelope Valley Air Quality Management District Rule 219 permitting requirements will be added to the Final EIR in Section 3.2.2.3 *Local Regulatory Setting*. The Draft EIR assumes that operation of backup generators will comply with District Rule 219. Additional discussion of District Rule 219 to evaluate the significance of project impacts under CEQA is not necessary.



Comment Letter LR-2



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Greg Ramirez, City Manager
City of Agoura Hills
30001 Ladyface Court
Agoura Hills, California 91301-2583

Dear Mr. Ramirez:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of Agoura Hills on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

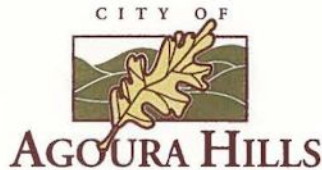
Sincerely,

A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment

Comment Letter LR-2



"Gateway to the Santa Monica Mountains National Recreation Area"

February 24, 2016

Nancy Yang
Project Engineer
Los Angeles Regional Interoperable Communications System
2535 Corporate Place, Suite 100
Monterey Park, CA 91754

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT (SCH #2014081025) FOR THE LOS ANGELES REGIONAL INTEROPERABLE COMMUNICATIONS SYSTEM LAND MOBILE RADIO PROJECT

Dear Ms. Yang:

1 Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) (SCH #2014081025) for the Los Angeles Regional Interoperable Communications System (LA-RICS) Land Mobile Radio (LMR) Project. We understand that the LMR system is a wireless communications system for mobile and portable devices, such as walkie-talkies and two-way radios, and would provide day-to-day voice and narrowband data radio communications coverage for emergency responders. The LMR system would consist of antennas and support equipment at up to 90 sites located mostly in Los Angeles County. However, a total of 94 sites have been considered. Of these, 40 sites were determined to be statutorily exempt from the California Environmental Quality Act (CEQA) under PRC Section 20180.25, and no further CEQA analysis is necessary. The DEIR considers the remaining 54 sites that were not statutorily exempt.

One of the LMR sites being considered in the DEIR is in the City of Agoura Hills. The site, referred to as "AGH," is located at Kimberly Peak, off an unnamed road, near Kimberly Drive in the Morrison Ranch area of the City. The site is zoned, and designated in the City General Plan as, Open Space-Deed Restricted (OS-DR). There are no other sites in Agoura Hills being considered – either in the DEIR or that were found to be statutorily exempt from CEQA.

The DEIR indicates that the proposed improvements at the site include the installation of up to 27 whip antennas (each up to 15 feet long) and up to five (5) microwave antennas (each two (2) to six (6) feet in diameter) on a new 70-foot tall, 6.5-foot diameter monopole, with an additional lightning rod of 15 feet high, for a total 85 foot-tall facility. If tower obstruction lighting is required, it may include red or white LED lamps, either steady or flashing, on the monopole. Either an existing equipment shelter at the site may be used, or a new 600 square-

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Ms. Nancy Yang
February 24, 2016
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foot shelter, either prefabricated or of concrete masonry unit – CMU, installed on a concrete slab. Exterior security lighting equivalent to one (1) 100-watt bulb would be installed. A diesel emergency generator on a 200-square-foot slab would be constructed and enclosed within a block wall, with a 1,500 gallon belly internal fuel tank integrated into the generator. About 800 feet of chain-link fence up to 12 feet in height is proposed around the facility. The depth of excavation is 36 feet for a drilled caisson for the monopole. In total, an area of 5,000 square feet would be disturbed to install the facilities, with permanent disturbance to a 3,000-square foot area.

We understand that best management practices (BMPs) have been incorporated into the project design to minimize impacts to environmental resources. Examples of BMPs listed in the DEIR include minimizing disturbed areas during construction; watering down the construction site; protecting slopes through erosion control blankets; and using erosion control measures to reduce siltation and runoff, among many others.

Our comments on the DEIR are described below, and are organized by section heading:

Section 2.3 Project Alternatives

2 The DEIR lists seven groups of two or more proposed project sites that would be alternatives to each other. However, the AGH site is not listed here as an alternative or as a site to which there are alternatives being explored. Please discuss why no alternatives to the site are being considered.

3 Given the various environmental impacts of the project at the AGH site, noted below, we recommend that alternatives to the facility at AGH be assessed in the DEIR. These could include reducing the height of the monopole (perhaps with a stronger support at the base); locating the antennas on an existing tower at the same site instead of constructing a new tower; and considering other sites nearby – within and outside of Agoura Hills, that would have less impacts. With regard to using an existing tower, DEIR Section 2.6.1 Collocation indicates that, “At some locations where towers are present, space is not sufficient on the existing tower to mount the LMR antennas.” Please provide information to demonstrate this condition specifically at AGH. This section further states, “Limiting the LMR locations to only those where collocation is possible would not provide the desired coverage; therefore, an alternative consisting entirely of collocation sites would not meet the Project objectives and was not considered further.” Please provide information demonstrating that locating the proposed facilities on an existing tower at the same site would not provide the desired coverage in this instance, particularly since the existing tower is located at the same site as AGH, and would be expected to provide the same, if not very similar, coverage. Additionally, while a project alternative considering all proposed LA-RICS facilities as collocations may not be feasible or desired, it seems appropriate to consider at least collocating the proposed facilities at the specific AGH site as a feasible alternative.

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Section 3.1 – Aesthetics

4 We suggest that the AGH site be considered visually sensitive given its location on top of a prominent hill that can be seen from many points in the City, including residential neighborhoods. In particular, the site is situated on a primary ridgeline, the Morrison Highlands, as identified on Figure NR-1 Open Space Resources in the Agoura Hills General Plan 2035 (2010). General Plan Goal NR-2 Visual Resources is for the “preservation of significant visual resources as important quality of life amenities for residents, and as assets for commerce, recreation and tourism.” General Plan Policy NR-2.3 Protect Ridgelines states, “Maintain the community’s primary and secondary ridgelines.” Additionally, the site is designated in the General Plan, and zoned, as Open Space-Deed Restricted (OS-DR). The purpose of the OS-DR zone, in part, is to preserve natural features and open space (Agoura Hills Municipal Code – AHMC Section 9490 et. seq.).

5 While we acknowledge that the AGH site is currently the location of several telecommunications-type facilities, the proposed LMR facility would add substantially more structures and a taller tower than what currently exists on the site, resulting in potentially significant aesthetic impacts from an increase in intensity of development, even though the AGH facilities may not block views. The AGH monopole could reach 85 feet tall, compared to the estimated maximum 60-foot high existing tower at the same location (per the DEIR). The AGH site, with the exception of some existing telecommunications equipment, is situated on a hilltop of the Santa Monica Mountains, in a natural area of the City where there is no hillside development. Single-family residential development is located below the hill, in the flatter portions of the City. The DEIR should analyze the potential impacts to aesthetics from the proposed LMR facilities located in this visually sensitive area. In particular, please consider the following:

1. Show the AGH site as being of high or medium viewer sensitivity on Figure 3.1.1.
2. Revise Table 3.1-1 to include the AGH site under the categories of, “Significant Ridgeline” and “Visual Sensitivity.”
3. Address the AGH site in the discussion of Section 3.1.2.3 Local Regulatory Setting, specifically its location on a primary ridgeline in the General Plan.
4. Analyze the AGH site in Section 3.1.4.1 Project Analysis as a high or medium sensitivity site. Revise the discussion of AGH under Impact “AES-1” (Scenic Vista) beginning on page 3-28, Impact “AES-3” (Visual Character) beginning on page 3-34 and under Impact “AES-4” (Light or Glare) starting on page 3-41, accordingly.

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Ms. Nancy Yang
 February 24, 2016
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5. Further, under the discussion of Impact “AES-3” on page 3.41, the reference to AGH being an “urban” area should be corrected. The site is set within a preserved open space area in a natural state, at the top of a primary ridgeline in the Santa Monica Mountains. The area below the hillside may be considered “urban,” but not the hillside itself, even though there are telecommunications facilities presently. The text under the paragraph heading, “Urban Areas” states that these are, “... areas where numerous sources of day and nighttime lighting are present, such as vehicle headlights, traffic signals, street lights, and building security lights. Because of the presence of these light sources, tower (monopole) lighting, if required, would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area...” Given the minimal lighting at the site presently, and its remote location on the hilltop in the OS-DR zone in the Santa Monica Mountains, where there are no other urban light sources, this analysis should be revised.

7 The project should be considered to cause a potentially significant operational impact on aesthetics from lighting and/or glare from the proposed lighting equivalent to one (1) 100-watt bulb, and possibly FAA required lighting. With regard to the former, the City has policies to shield and direct downward all exterior lighting to prevent light spillover and/or glare (*City Architectural Design Standards & Guidelines*, Section III.G Exterior Lighting). The DEIR should reference and incorporate these requirements as a mitigation measure. We request that LA-RICS consider as minimal lighting as feasible at this site, given the surrounding natural area and visibility from numerous points in the City.

Section 3.3 - Biological Resources

This section identifies vegetation communities in and around the AGH site. The DEIR identifies the site being within a California walnut woodland. The site is also set within an area of coastal sage scrub habitat, which should be addressed in the analysis of impacts to biological resources. Specifically, please consider the following:

1. Table 3.3-1 should include AGH as a site within the “Coastal sage scrub” vegetation community. (Note that this community is listed as being within the area of AGH in Table 3.3-3).
2. Table 3.3-4 should be corrected to list AGH under “California Walnut Woodland,” consistent with the discussion in this section.
3. Within DEIR Section 4.0 Site Summary Forms, the Mitigation Measure under Impact BIO-2 (substantial adverse impact on riparian habitat or other sensitive natural community) reads, “Minimize disturbance to natural vegetation; do not remove California walnut trees. Prior to construction mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Use caution to minimize the use of heavy equipment near (within the dripline) walnut

Comment Letter LR-2

Ms. Nancy Yang
 February 24, 2016
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trees to protect the plant's root system." However, this Mitigation Measure does not appear to be referenced in the Biological Resources section or elsewhere in the DEIR. Please incorporate this mitigation into a formal Mitigation Measure and reference it where appropriate for site AGH.

Section 3.4-1 Cultural Resources

We appreciate that Mitigation Measures CUL 6 and CUL 7 related to protecting paleontological resources have been incorporated into the DEIR for site AGH. Table 3.4-4 lists Mitigation Measure CUL 1 (archaeological monitoring), CUL 3 (unexpected discovery of archaeological remains), and CUL (unexpected discovery of human remains) as applicable to site AGH. Yet, Table ES-2 Environmental Impacts and Mitigation Measures in the Executive Summary does not list these mitigation measures for AGH, and the Summary Form for AH in DEIR Section 4.0 Site Summary Forms does not list these mitigation measures as applicable for AGH. Please correct this discrepancy. While the DEIR notes that no identified archaeological sites have been identified within 0.5 mile of the site, Agoura Hills in general is considered a sensitive archaeological area, and discovery of previously unknown cultural resources is possible. As such, the City typically incorporates mitigation measures in construction projects to have an archaeologist and Native American representative monitor subsurface work, and, in the event human remains are uncovered, follow procedures as outlined in the CEQA Guidelines and required under state and federal law. Please ensure that such protective measures are incorporated into the DEIR for site AGH.

Section 3.9 – Land Use/Planning

Table 3.9-4 states that the height limit in the OS-DR zone, where the facilities are proposed, is 60 feet. The OS-DR standards in the Agoura Hills Municipal Code do not list 60 feet as the maximum allowed height. Please also note that the proposed facility is not listed as an allowed use in the OS-DR zone. Consequently, please correct Section 4.0 Site Summary Forms notes under "Setting" and "Impact Analysis" that the required permit would be a Conditional Use Permit.

Section 3.10 - Noise

In addition to the City's Zoning Ordinance, the General Plan 2035 (2010), Chapter 5: Community Safety, Noise section, addresses noise in Agoura Hills. Please list the appropriate General Plan standards in DEIR Table 3.10-2 and analyze potential noise impacts from ongoing operation of AGH in light of these standards. Specifically, see Table N-1 (Noise/Land Use Compatibility Matrix) and Table N-2 (Interior/Exterior Noise Standards) of the General Plan. This section of the DEIR estimates the potential operational noise from the facility as 58 dBA at 21 feet away

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Ms. Nancy Yang
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15 | for the emergency generator (assuming solid walls around it, as proposed), and 52 dBA at 10 feet away for the HVAC systems. Please confirm that this estimate would be accurate specifically for AGH, considering that the site would be located on a hilltop, with residential uses below.

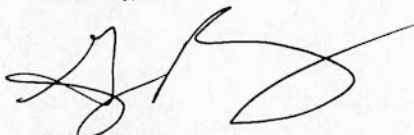
16 | The DEIR lists the allowed hours of construction noise pursuant to the Municipal Code, which are from 7:00 a.m. to 7:00 p.m. during the weekdays and on Saturdays. We request that these hours be strictly adhered to, given that the access road to the site begins in a single-family residential neighborhood, and driveway entrance is located specifically between two residences.

Other

17 | While not related to CEQA, we recommend that you coordinate with the property owner, Morrison Ranch Homeowners' Association, at your earliest convenience regarding possible use of the proposed site.

Thank you for your consideration of these comments. If you have any questions, please contact Allison Cook, Assistant Planning Director, at (818) 597-7310 or at acook@ci.agoura-hills.ca.us.

Sincerely,



Greg Ramirez
City Manager

Responses to Comment Letter LR-2

The Authority appreciates the City of Agoura Hills' comments on the Draft Environmental Impact Report (EIR) dated February 24, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) (SCH #2014081025) for the Los Angeles Regional Interoperable Communications System (LA-RICS) Land Mobile Radio (LMR) Project. We understand that the LMR system is a wireless communications system for mobile and portable devices, such as walkie-talkies and two-way radios, and would provide day-to-day voice and narrowband data radio communications coverage for emergency responders. The LMR system would consist of antennas and support equipment at up to 90 sites located mostly in Los Angeles County. However, a total of 94 sites have been considered. Of these, 40 sites were determined to be statutorily exempt from the California Environmental Quality Act (CEQA) under PRC Section 20180.25, and no further CEQA analysis is necessary. The DEIR considers the remaining 54 sites that were not statutorily exempt.

One of the LMR sites being considered in the DEIR is in the City of Agoura Hills. The site, referred to as "AGH/" is located at Kimberly Peak, off an unnamed road, near Kimberly Drive in the Morrison Ranch area of the City. The site is zoned, and designated in the City General Plan as, Open Space-Deed Restricted (OS-DR). There are no other sites in Agoura Hills being considered - either in the DEIR or that were found to be statutorily exempt from CEQA.

The DEIR indicates that the proposed improvements at the site include the installation of up to 27 whip antennas (each up to 15 feet long) and up to five (5) microwave antennas (each two (2) to six (6) feet in diameter) on a new 70-foot tall, 6.5-foot diameter monopole, with an additional lightning rod of 15 feet high, for a total 85 foot-tall facility. If tower obstruction lighting is required, it may include red or white LED lamps, either steady or flashing, on the monopole. Either an existing equipment shelter at the site may be used, or a new 600 square-foot shelter, either prefabricated or of concrete masonry unit - CMU, installed on a concrete slab. Exterior security lighting equivalent to one (1) 100-watt bulb would be installed. A diesel emergency generator on a 200-square-foot slab would be constructed and enclosed within a block wall, with a 1,500 gallon belly internal fuel tank integrated into the generator. About 800 feet of chain-link fence up to 12 feet in height is proposed around the facility. The depth of excavation is 36 feet for a drilled caisson for the monopole. In total, an area of 5,000 square feet would be disturbed to install the facilities, with permanent disturbance to a 3,000-square foot area.

We understand that best management practices (BMPs) have been incorporated into the project design to minimize impacts to environmental resources. Examples of BMPs listed in the DEIR include minimizing disturbed areas during construction; watering down the construction site; protecting slopes through erosion control blankets; and using erosion control measures to reduce siltation and runoff, among many others.

Response to Comment 1: The information provided in this comment is accurate.

Responses to Comment Letter LR-2

Comment 2: The DEIR lists seven groups of two or more proposed project sites that would be alternatives to each other. However, the AGH site is not listed here as an alternative or as a site to which there are alternatives being explored. Please discuss why no alternatives to the site are being considered.

Response to Comment 2: The Authority explored numerous options for providing LMR coverage to the City of Agoura Hills and the 101 Freeway areas. The Authority conducted a candidate site search in the area to identify potential sites that provided coverage to areas that could not be covered by other planned sites. The area targeted includes both the north and south sides of the 101 Freeway in Agoura Hills, the City of Westlake Village (particularly the western side of the City), as well as the north facing slopes of the Santa Monica Mountains in order to penetrate the canyons and roads. Although there were other sites that existed (commercial carriers) or could be built (City of Westlake Village), no other viable sites were identified that could provide coverage for this area.

Comment 3: Given the various environmental impacts of the project at the AGH site, noted below, we recommend that alternatives to the facility at AGH be assessed in the DEIR. These could include reducing the height of the monopole (perhaps with a stronger support at the base); locating the antennas on an existing tower at the same site instead of constructing a new tower; and considering other sites nearby - within and outside of Agoura Hills, that would have less impacts. With regard to using an existing tower, DEIR Section 2.6.1 Collocation indicates that, "At some locations where towers are present, space is not sufficient on the existing tower to mount the LMR antennas." Please provide information to demonstrate this condition specifically at AGH. This section further states, "Limiting the LMR locations to only those where collocation is possible would not provide the desired coverage; therefore, an alternative consisting entirely of collocation sites would not meet the Project objectives and was not considered further." Please provide information demonstrating that locating the proposed facilities on an existing tower at the same site would not provide the desired coverage in this instance, particularly since the existing tower is located at the same site as AGH, and would be expected to provide the same, if not very similar, coverage. Additionally, while a project alternative considering all proposed LA-RICS facilities as collocations may not be feasible or desired, it seems appropriate to consider at least collocating the proposed facilities at the specific AGH site as a feasible alternative.

Response to Comment 3: Please see response to Comment 2, above, discussing the lack of other viable sites that could provide LMR coverage for this area. Regarding the comment on collocation, the Authority is considering numerous sites throughout the County for collocation where existing structures are able to meet the existing building codes and provide the level of stability necessary for a public safety network. The Authority has determined that the existing towers at Site AGH do not meet current building codes. Therefore, collocation on existing towers at Site AGH is not feasible under existing conditions and would require retrofitting to ensure the existing towers meet current building codes, which would add extra expense and may not ultimately be possible. Even if upgrade of the tower were feasible, collocation on existing towers at Site AGH would require the Authority to upgrade another entity's infrastructure without compensation and would put the Authority in a position of a lessee on that tower, which would very likely increase the cost of the site to the Authority and by extension, the tax payers. Additionally, it would not be technically feasible to collocate equipment on existing towers at Site AGH because the lower height of the existing towers would limit the amount of equipment the Authority could place on the towers and lower the coverage performance, which would result in a decreased ability to meet the project objectives in this geographic area.

Responses to Comment Letter LR-2

Comment 4: We suggest that the AGH site be considered visually sensitive given its location on top of a prominent hill that can be seen from many points in the City, including residential neighborhoods. In particular, the site is situated on a primary ridgeline, the Morrison Highlands, as identified on Figure NR-1 Open Space Resources in the Agoura Hills General Plan 2035 (2010). General Plan Goal NR-2 Visual Resources is for the *lip* reservation of significant visual resources as important quality of life amenities for residents, and as assets for commerce, recreation and tourism." General Plan Policy NR-2.3 Protect Ridgelines states, "Maintain the community's primary and secondary ridgelines." Additionally, the site is designated in the General Plan, and zoned, as Open Space-Deed Restricted (OS-DR). The purpose of the OS-DR zone, in part, is to preserve natural features and open space (Agoura Hills Municipal Code - AHMC Section 9490 et. seq.).

Response to Comment 4: Site AGH is located outside of the Santa Monica Mountains National Recreation Area on a ridgeline that is surrounded on all sides by dense residential development that has encroached to the base of the hills, and well into natural canyons, such as along Kimberly Drive to the east, Rolling Ridge Drive to the south, and Lake Lindero Drive to the west. Aerial maps display significant slopes cut into the hillside. Due to the extensive development surrounding the site, the Authority determined that Site AGH is located in an urban area rather than a rural or remote area, despite being in an area zoned by the City of Agoura Hills as open space. Urban areas that are not within the coastal zone or parklands are not considered visually sensitive.

The Draft EIR analyzes visual impacts for this project, including at Site AGH, using a quarter-mile radius as a visual buffer. Representative viewpoints in the City of Agoura Hills were selected in relation to this buffer to analyze visual effects, as shown below. Sites were chosen to represent typical views. As shown in the photos that follow, the existing site is not visible from Views 1 and 2. View 1 shows mature landscaping typical of the surrounding residential areas that would preclude views of the ridgeline from many residences. The dominant visual feature in View 2 is the significant slope cut for the road that provides access to residential development. Although the existing tower is visible from the ridgetop in View 3, it is not the dominant visual feature given the tower's size and scale. Rather, the foreground residential elements and the hill itself dominate the view. From this distance, the addition of another 70-foot tall monopole with a 15-foot tall lightning rod would still not dominate the view. The proposed new tower would also be a monopole, with less girth (and therefore, less visual intrusion) than the existing lattice towers. Therefore, the Draft EIR's conclusion that visual impacts would be less than significant at Site AGH is accurate and supported by substantial evidence.

Responses to Comment Letter LR-2



View 1: 5775 Willowtree Drive Agoura Hills, CA, Looking Northeast (existing site not visible)



Responses to Comment Letter LR-2

View 2: 5774 Rista Drive, Agoura Hills, CA, Looking North (existing site not visible)



View 3: 29362 Castlehill Drive, Agoura Hills, CA, Looking West



Responses to Comment Letter LR-2

Comment 5: While we acknowledge that the AGH site is currently the location of several telecommunications-type facilities, the proposed LMR facility would add substantially more structures and a taller tower than what currently exists on the site, resulting in potentially significant aesthetic impacts from an increase in intensity of development, even though the AGH facilities may not block views. The AGH monopole could reach 85 feet tall, compared to the estimated maximum 60-foot high existing tower at the same location (per the DEIR). The AGH site, with the exception of some existing telecommunications equipment, is situated on a hilltop of the Santa Monica Mountains, in a natural area of the City where there is no hillside development. Single-family residential development is located below the hill, in the flatter portions of the City. The DEIR should analyze the potential impacts to aesthetics from the proposed LMR facilities located in this visually sensitive area. In particular, please consider the following:

1. Show the AGH site as being of high or medium viewer sensitivity on Figure 3.1.1.
2. Revise Table 3.1-1 to include the AGH site under the categories of, "Significant Ridgeline" and "Visual Sensitivity."
3. Address the AGH site in the discussion of Section 3.1.2.3 Local Regulatory Setting, specifically its location on a primary ridgeline in the General Plan.
4. Analyze the AGH site in Section 3.1.4.1 Project Analysis as a high or medium sensitivity site. Revise the discussion of AGH under Impact "AES-1" (Scenic Vista) beginning on page 3-28, Impact "AES-3" (Visual Character) beginning on page 3-34 and under Impact "AES-4" (Light or Glare) starting on page 3-41, accordingly.

Response to Comment 5: Please see Response to Comment # 4, above, regarding the visual sensitivity of Site AGH. The proposed structures at Site AGH include a monopole up to 70 feet tall with an additional 15-foot lightning rod, equipment racks to be located in an existing equipment shelter or a new 600-square foot shelter, a diesel generator and associated fuel tank, and up to 800 feet of chain-link fence up to 12 feet high. The site currently contains shelters and is surrounded by a chain link fence. A 600-square foot shelter, generator and fuel tank, and 800 feet of chain-link fence do not constitute substantially more structures that would result in significant impacts. The low height of these structures would make them indiscernible from nearby residential vantage points. Therefore, no changes to the Draft EIR are required in response to this comment.

Comment 6: Further, under the discussion of Impact "AES-3" on page 3.41, the reference to AGH being an "urban" area should be corrected. The site is set within a preserved open space area in a natural state, at the top of a primary ridgeline in the Santa Monica Mountains. The area below the hillside may be considered "urban," but not the hillside itself, even though there are telecommunications facilities presently. The text under the paragraph heading, "Urban Areas" states that these are, "... areas where numerous sources of day and nighttime lighting are present, such as vehicle headlights, traffic signals, street lights, and building security lights. Because of the presence of these light sources, tower (monopole) lighting, if required, would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area ..." Given the minimal lighting at the site presently, and its remote location on the hilltop in the OS-DR zone in the Santa Monica Mountains, where there are no other urban light sources, this analysis should be revised.

Responses to Comment Letter LR-2

Response to Comment 6: Please see response to Comment # 4 regarding the visual sensitivity of Site AGH. Even though the site is located on a hilltop and not directly within the adjacent residential area, the proximity of urban encroachment has introduced human-caused light intrusions up to a quarter mile from the site, including vehicle headlights, traffic signals, street lights, etc. Residents within sight of the towers would be exposed to these existing light sources. In addition, the presence of the existing telecommunications facilities has already altered the “natural state” of the ridgeline, and the addition of any FAA-required lighting at site AGH would not substantially change this condition or increase the significance of any visual impact. Therefore, no changes to the Draft EIR are required in response to this comment.

Comment 7: The project should be considered to cause a potentially significant operational impact on aesthetics from lighting and/or glare from the proposed lighting equivalent to one (1) 100-watt bulb, and possibly FAA required lighting. With regard to the former, the City has policies to shield and direct downward all exterior lighting to prevent light spillover and/or glare (*City Architectural Design Standards & Guidelines*, Section III.G Exterior Lighting). The DEIR should reference and incorporate these requirements as a mitigation measure. We request that LA-RICS consider as minimal lighting as feasible at this site, given the surrounding natural area and visibility from numerous points in the City.

Response to Comment 7: Implementation of the proposed project will comply with FAA requirements, which stipulate that tower lighting, where required, be visible to pilots from above. Section AES-4 on page 3-41 of the Draft EIR also notes that, because of the presence of existing light sources in the adjacent residential areas, tower (monopole) lighting, if required, would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area, resulting in a less than significant impact. Plans for any grounds lighting at the site will include consideration of neighboring uses, along with other factors such as site security and safety. Therefore, no changes to the Draft EIR are required in response to this comment.

Comment 8: This section identifies vegetation communities in and around the AGH site. The DEIR identifies the site being within a California walnut woodland. The site is also set within an area of coastal sage scrub habitat, which should be addressed in the analysis of impacts to biological resources. Specifically, please consider the following:

1. Table 3.3-1 should include AGH as a site within the "Coastal sage scrub" vegetation community. (Note that this community is listed as being within the area of AGH in Table 3.3-3).
2. Table 3.3-4 should be corrected to list AGH under "California Walnut Woodland," consistent with the discussion in this section.
3. Within DEIR Section 4.0 Site Summary Forms, the Mitigation Measure under Impact B10-2 (substantial adverse impact on riparian habitat or other sensitive natural community) reads, "Minimize disturbance to natural vegetation; do not remove California walnut trees. Prior to construction mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Use caution to minimize the use of heavy equipment near (within the dripline) walnut trees to protect the plant's root system." However, this Mitigation Measure does not appear to be referenced in the Biological Resources section or elsewhere in the DEIR. Please incorporate this mitigation into a formal Mitigation Measure and reference it where appropriate for site AGH.

Responses to Comment Letter LR-2

Response to Comment 8: Table 3.3-1 will be revised in the Final EIR to include Site AGH under coastal sage scrub. Table 3.3-4 will be revised in the Final EIR to include Site AGH under California walnut woodland. Regarding the comment on mitigation for Impact BIO-2, the text referenced in the comment provides the same protection as mitigation measure **BIO MM 9 Protect Native Vegetation and Common Wildlife**. Because BIO MM 9 is applicable to Site AGH, the referenced text is redundant, and will be deleted from page 4-12. These revisions to the Final EIR do not result in any new significant impact or an increase in the severity of any environmental impact.

Comment 9: We appreciate that Mitigation Measures CUL 6 and CUL 7 related to protecting paleontological resources have been incorporated into the DEIR for site AGH. Table 3.4-4 lists Mitigation Measure CUL 1 (archaeological monitoring), CUL 3 (unexpected discovery of archaeological remains), and CUL (unexpected discovery of human remains) as applicable to site AGH. Yet, Table ES-2 Environmental Impacts and Mitigation Measures in the Executive Summary does not list these mitigation measures for AGH...

Response to Comment 9: Footnotes to Tables 3.4-3 and 3.4-4 in the Draft EIR state that no impacts to historic resources are expected at Site AGH; however, mitigation in the form of monitoring is required at the site at the request of the Soboba Band of Luiseno Indians. Pages 4-14 through 4-16 of the Draft EIR provide the same statement. The following note from Tables 3.4-3 and 3.4-4 applies to Site AGH and will be added as a footnote to Table ES-2 to provide clarification:

² Based on records searches and field surveys, there are no archaeological sites within the direct APE of this project site and there would be no impacts; however, a monitor would be present during ground disturbing activities at the request of the Soboba Band of Luiseño Indians.

Comment 10: ...and the Summary Form for AH in DEIR Section 4.0 Site Summary Forms does not list these mitigation measures as applicable for AGH. Please correct this discrepancy.

Response to Comment 10: Pages 4-14 and 4-15 of the Draft EIR currently describe the archaeological resources and mitigation measures at Site SGH. None of the identified archaeological resources are historical resources as defined under CEQA and, based on their nature and integrity, would not meet the CEQA criteria. This information is provided under CUL-1, CUL-2, CUL-4, and CUL-5. Therefore, no changes to the Draft EIR are required in response to this comment.

Comment 11: While the DEIR notes that no identified archaeological sites have been identified within 0.5 mile of the site, Agoura Hills in general is considered a sensitive archaeological area, and discovery of previously unknown cultural resources is possible.

Response to Comment 11: The footnote to Draft EIR Table 3.4-4 indicates that no archaeological sites have been identified within the direct APE (i.e., the project ground-disturbing footprint). Pages 4-14 and 4-15 indicate that three archaeological sites have been recorded within the 0.5 mile radius around Site AGH but would not be impacted by construction. None of the identified archaeological resources are historical resources as defined under CEQA and, based on their nature and integrity, would not meet the CEQA criteria. This information is provided under CUL-1, CUL-2, CUL-4, and CUL-5. Therefore, no changes to the Draft EIR are required in response to this comment.

Responses to Comment Letter LR-2

Comment 12: As such, the City typically incorporates mitigation measures in construction projects to have an archaeologist and Native American representative monitor subsurface work, and, in the event human remains are uncovered, follow procedures as outlined in the CEQA Guidelines and required under state and federal law. Please ensure that such protective measures are incorporated into the DEIR for site AGH.

Response to Comment 12: Mitigation measures for the protection of cultural resources have been described on pages 3-314 and 3-315 of Section 3.4.5.1 of the Draft EIR and applied to Site AGH at pages 4-14 and 4-15. The appropriate mitigation measures are shown in Draft EIR Table 3.4-4 and noted in Draft EIR Chapter 4 under CUL-1, CUL-2, CUL-4, and CUL-5 for the site. Therefore, no changes to the Draft EIR are required in response to this comment.

Comment 13: Table 3.9-4 states that the height limit in the OS-DR zone, where the facilities are proposed, is 60 feet. The OS-DR standards in the Agoura Hills Municipal Code do not list 60 feet as the maximum allowed height. Please also note that the proposed facility is not listed as an allowed use in the OS-DR zone. Consequently, please correct Section 4.0 Site Summary Forms notes under "Setting" and "Impact Analysis" that the required permit would be a Conditional Use Permit.

Response to Comment 13: Table 3.9-4 and page 4-28 of the Draft EIR notes will be revised to reflect the OS-DR zoning restrictions. These revisions to the Final EIR do not result in any new significant impact or an increase in the severity of any environmental impact.

Comment 14: In addition to the City's Zoning Ordinance, the General Plan 2035 (2010), Chapter 5: Community Safety, Noise section, addresses noise in Agoura Hills. Please list the appropriate General Plan standards in DEIR Table 3.10-2 and analyze potential noise impacts from ongoing operation of AGH in light of these standards. Specifically, see Table N-1 (Noise/Land Use Compatibility Matrix) and Table N-2 (Interior/Exterior Noise Standards) of the General Plan.

Response to Comment 14: Table 3.10-2 text will be revised to include the referenced City's General Plan noise standards. These revisions to the Final EIR do not result in any new significant impact or an increase in the severity of any environmental impact.

Comment 15: This section of the DEIR estimates the potential operational noise from the facility as 58 dBA at 21 feet away for the emergency generator (assuming solid walls around it, as proposed), and 52 dBA at 10 feet away for the HVAC systems. Please confirm that this estimate would be accurate specifically for AGH, considering that the site would be located on a hilltop, with residential uses below.

Response to Comment 15: Estimated noise levels from operation of Site AGH are provided on pages 4-31 and 4-32 of the Draft EIR, and are consistent with the estimates referenced in the comment. Therefore, no changes to the Draft EIR are required in response to this comment.

Comment 16: The DEIR lists the allowed hours of construction noise pursuant to the Municipal Code, which are from 7:00 a.m. to 7:00 p.m. during the weekdays and on Saturdays. We request that these hours be strictly adhered to, given that the access road to the site begins in a single-family residential neighborhood, and driveway entrance is located specifically between two residences.



Responses to Comment Letter LR-2

Response to Comment 16: The comment has been noted. No changes to the Draft EIR are required in response to this comment.

Comment 17: While not related to CEQA, we recommend that you coordinate with the property owner, Morrison Ranch Homeowners' Association, at your earliest convenience regarding possible use of the proposed site.

Response to Comment 17: The comment has been noted. No changes to the Draft EIR are required in response to this comment.



Comment Letter LR-3



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Ryan Gohlich, AICP
Assistant Director/City Planner
Community Development Department
City of Beverly Hills
455 N. Rexford Drive
Beverly Hills, California 90210

Dear Mr. Gohlich:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of Beverly Hills on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment

Comment Letter LR-3



February 25, 2014

Ms. Nancy Yang, Project Engineer
Los Angeles Regional Interoperable Communications System Joint Powers Authority
2525 Corporate Lane, Suite 100
Monterey Park, California 91754

RE: Notice of Availability of a Draft Environmental Impact Report – LA RICS Land Mobile Radio (LMR) Project (SCH #2014081025)

Dear Ms. Nancy Yang:

Thank you for providing the City of Beverly Hills (City) with the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the LA RICS LMR Project (Project). Because a portion of the project is located in the City of Beverly Hills, there is a potential that the City of Beverly Hills and its residents could experience negative impacts both during the construction of this project and as a result of operation thereafter. The City is requesting that the following comments be considered, and, as appropriate, addressed in the Final Environmental Impact Report for the Project.

LOCATION

- 1 | The City is concerned about the use of the Walker drive site for the LA RICS Facility due to the fact that it is a relatively small site and there are a number of other facilities already occupying the space.
- 2 | Further, the City would like to reserve additional space existing on the site for the expansion of City infrastructure. For this reason, the City is opposes the use of this site for the LA RICS LMR Project.



Comment Letter LR-3

LA RICS LMR DEIR Comment Letter
February 25, 2016
Page 2 of 3

TRANSPORTATION/TRAFFIC

3 | The City has concerns about construction equipment in the Trousdale Estates area. Should the Project move forward at the Walker Drive Site please consult with the City’s Transportation Division to ensure that all hauling and Trousdale Construction regulations are being followed. Please call 310.285.1141 for more information.

NOISE

4 | The City continues to have concerns about the potential noise impacts resulting from the construction of the proposed Project. The Trousdale Estates area is a residential neighborhood and construction noise resulting from excavators, trucks and jackhammers would be disruptive to the residents of the neighborhood.

SAFETY AND SECURITY

5 | The City of Beverly Hills Police Department is currently working on a plan to increase security measures and limit access to the Walker Drive site. The addition of equipment on this site is of particular concern to the City due to the fact that it may increase the need for vendors or maintenance teams to access the site.

GEOLOGY AND SOILS

6 | The City has concerns regarding ground stability at the proposed project site due to the fact that it is located in a potential landslide zone area as designated by the California Department of Conservation, California Geological Survey.

HAZARDS AND HAZARDOUS MATERIALS

7 | The City of Beverly Hills is opposed to the introduction of hazardous materials (the proposed diesel fuel tank) on the Walker Drive site as it is located in a residential neighborhood.

AESTHETICS

8 | The City is concerned about the potential aesthetic impacts that the Project may have on the surrounding neighborhood. The extension of the existing tower at the Walker Drive site could negatively impact the views from the surrounding residential properties. Further, the City is concerned about the proposed red or white LED lamps that may be installed as part of the project, as well as the proposed exterior security lighting on the 600 square foot equipment shelter. Lighting of this nature is incompatible with the residential neighborhood surrounding the Project site.



Comment Letter LR-3

LA RICS LMR DEIR Comment Letter
February 25, 2016
Page 3 of 3

LAND USE AND PLANNING

10 The DEIR suggests that the General Plan Designation for the site is Single Family Residential – Low Density and the Zoning is One Family Residential. The Zoning for the parcel is “Parks, Reservoirs, Government (Unzoned)”, please revise.

CULTURAL RESOURCES

11 As a telecommunications project that involves the Federal Communications Commission (FCC), Section 106 review is required to study the impact on historic and cultural resources. Please identify if a Section 106 review has been completed, pursuant to the programmatic agreement. As an interested party, please provide us with a copy of the report.

12 Under Impact Analysis CUL-1, it appears that historic resources within the City of Los Angeles were studied, but not within Beverly Hills. Direct and indirect / visual impacts to historic resources to the immediate site (water tower and surroundings) and the adjacent neighborhoods (i.e. Trousdale Estates) in Beverly Hills should be studied and addressed in your analysis.

Thank you again for this opportunity to provide input on the Draft Environmental Impact Report. The City of Beverly Hills is looking forward to working with the Joint Powers Authority to discuss appropriate and adequate mitigation measures and project alternatives.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Gohllich", is positioned above the printed name.

RYAN GOHLICH, AICP
Assistant Director/City Planner,
Community Development Department

cc: Mahdi Aluzri, City Manager
George Chavez, Assistant City Manager
Susan Healy Keene, AICP, Director of Community Development
Aaron Kunz, AICP, Deputy Director of Transportation
Scott Stephens, Fire Battalion Chief
Lincoln Hoshino, Police Sergeant

Responses to Comment Letter LR-3

The Authority appreciates the City of Beverly Hills' comments on the Draft Environmental Impact Report (EIR) dated February 25, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: The City is concerned about the use of the Walker drive site for the LA RICS Facility due to the fact that it is a relatively small site and there are a number of other facilities already occupying the space.

Response to Comment 1: The City's concerns are noted. No revisions to the Draft EIR are required in response to this comment.

Comment 2: Further, the City would like to reserve additional space existing on the site for the expansion of City infrastructure. For this reason, the City is opposes the use of this site for the LA RICS LMR Project.

Response to Comment 2: The City's concerns are noted. No revisions to the Draft EIR are required in response to this comment.

Comment 3: The City has concerns about construction equipment in the Trousdale Estates area. Should the Project move forward at the Walker Drive Site please consult with the City's Transportation Division to ensure that all hauling and Trousdale Construction regulations are being followed? Please call 310.285.1141 for more information.

Response to Comment 3: The City's comments are noted. If the site is included in the final design, the Authority will consult with the City Transportation Division prior to initiation of construction at the site. No revisions to the Draft EIR are required in response to this comment.

Comment 4: The City continues to have concerns about the potential noise impacts resulting from the construction of the proposed Project. The Trousdale Estates area is a residential neighborhood and construction noise resulting from excavators, trucks and jackhammers would be disruptive to the residents of the neighborhood.

Response to Comment 4: The City's noise standards were considered in the Draft EIR, as discussed in Section 3.10.2.3, Local Regulatory Setting. Site-specific noise analysis is also provided beginning at page 4-1904 of the Draft EIR. No revisions to the Draft EIR are required in response to this comment.

Comment 5: The City of Beverly Hills Police Department is currently working on a plan to increase security measures and limit access to the Walker Drive site. The addition of equipment on this site is of particular concern to the City due to the fact that it may increase the need for vendors or maintenance teams to access the site.

Response to Comment 5: The City's concerns are noted. If the site is included in the final design, the Authority will coordinate with the City regarding access at the site. No revisions to the Draft EIR are required in response to this comment.

Responses to Comment Letter LR-3

Comment 6: The City has concerns regarding ground stability at the proposed project site due to the fact that it is located in a potential landslide zone area as designated by the California Department of Conservation, California Geological Survey.

Response to Comment 6: The Draft EIR discusses landslide hazards associated with Site WAD in Section 3.5.1.1 and Table 3.5-2. Site specific information regarding the geology of the site is provided beginning at page 4-1890 of the Draft EIR. The Draft EIR identifies that the site lies within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). Antennas would be collocated to existing lattice structure, therefore a geotechnical study for new structures would not be required. Therefore impacts would be less than significant. No revisions to the Draft EIR are required in response to this comment.

Comment 7: The City of Beverly Hills is opposed to the introduction of hazardous materials (the proposed diesel fuel tank) on the Walker Drive site as it is located in a residential neighborhood.

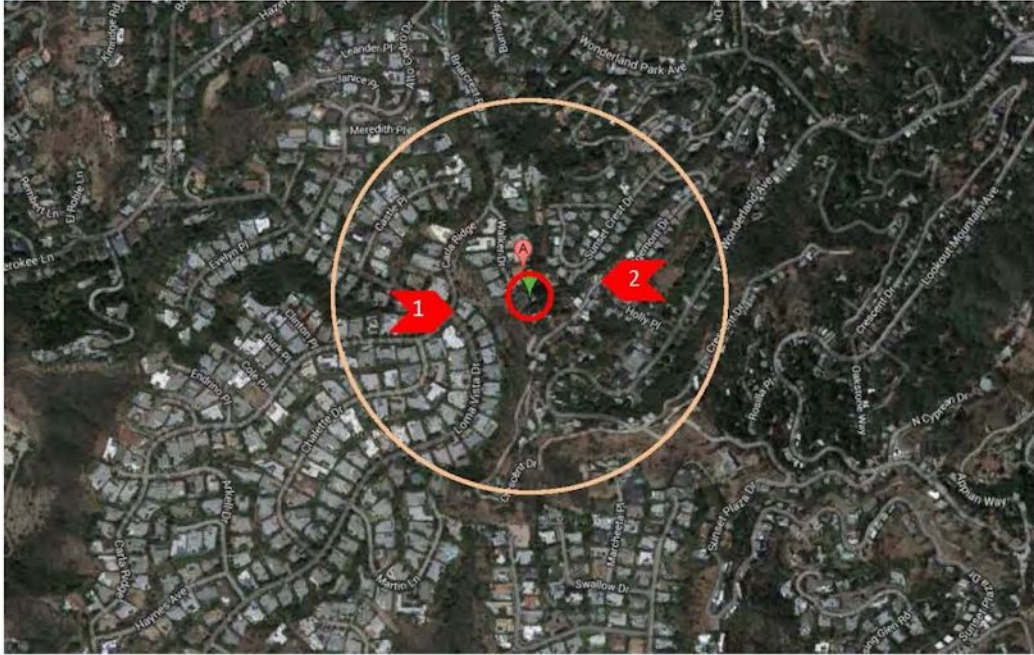
Response to Comment 7: The City's concerns are noted. Management of diesel fuel and other hazardous substances is discussed in Section 3.7 of the Draft EIR, and specific analysis is provided for Site WAD beginning at page 4-1895. As noted in the Draft EIR, management of hazardous substances would occur in accordance with all Federal, state and local regulations. No revisions to the Draft EIR are required in response to this comment.

Comment 8: The City is concerned about the potential aesthetic impacts that the Project may have on the surrounding neighborhood. The extension of the existing tower at the Walker Drive site could negatively impact the views from the surrounding residential properties.

Response to Comment 8: Aesthetic effects of the project were evaluated in Section 3.1 of the Draft EIR with specific analysis provided for Site WAD beginning at page 4-1877. A large water tank, one-story pumping house, three small equipment shelters, narrow lattice tower, and 120-foot-tall monopole are currently present on the proposed site. No additional towers or monopoles would be built at this site; rather, the project proposes to add up to 20 whip and up to 5 microwave antennas on the existing 120-foot monopole, and extend the existing monopole height up to an additional 20 feet. The project also proposes adding a lightning rod that would be up to 15 feet high, and potentially build a 600-square-foot equipment shelter. The visual analysis considered the setting of the site, which includes single-family houses that are typically one story and of various designs. The area's topography is hilly and the existing towers are only intermittently visible due to the topography and mature, dense vegetation. Further, the existing structures on the site, as well as telephone poles and wires that line the narrow streets, currently intrude on views. Despite the height of the existing towers on the site, they are only intermittently visible due to the area's topography and vegetation, as provided below.

Responses to Comment Letter LR-3

Map of viewpoints – site WAD



View: Looking West from 2150 Ridgmont Drive, Los Angeles, CA



Responses to Comment Letter LR-3

View 2: Looking East from 1896 Loma Vista Drive, Beverly Hills, CA



The visual analysis found that the proposed new facilities would be compatible with the existing visual character and quality of the site, which is low due to the presence of manmade development. Despite extending the height of the existing tower, the tall trees that currently surround the site and the varying topography of the area would continue to obscure most of the site from view as they do today. Although the proposed project would result in visual changes to the site; the proposed project would result in less than significant visual impacts for the reasons stated above. No changes to the Draft EIR are required in response to this comment.

Comment 9: Further, the City is concerned about the proposed red or white LED lamps that may be installed as part of the project, as well as the proposed exterior security lighting on the 600 square foot equipment shelter. Lighting of this nature is incompatible with the residential neighborhood surrounding the Project site.

Response to Comment 9: The City's concerns are noted. Effects from lighting or glare were evaluated in Section 3.1 of the Draft EIR, with site specific analysis for light and glare concerns for Site WAD provided at page 4-1878. Site WAD is located within a suburban area with extensive development adjacent to the site. The site is located in an area where numerous sources of lighting are present, such as vehicle headlights, street lights, and residential lighting. The Draft EIR also notes that, because of the presence of these light sources, tower (monopole) lighting, if required, would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area, resulting in a less than significant impact. A new equipment shelter, if built, would be visually subordinate to, and likely blocked by, the existing structures on the site. Further, the exterior security lighting on the new shelter would be equivalent to a 100-watt light bulb. For these reasons, security lighting on the shelter would result in a less than significant visual impact. No changes to the Draft EIR are required in response to this comment.

Comment 10: The DEIR suggests that the General Plan Designation for the site is Single Family Residential — Low Density and the Zoning is One Family Residential. The Zoning for the parcel is “Parks, Reservoirs, Government (Unzoned)”, please revise.

Responses to Comment Letter LR-3

Response to Comment 10: Table 3.9-4 in the Draft EIR will be revised to reflect the proper zoning classification. This revision does not result in any change to the impact conclusions in the Draft EIR.

Comment 11: As a telecommunications project that involves the Federal Communications Commission (FCC), Section 106 review is required to study the impact on historic and cultural resources. Please identify if a Section 106 review has been completed, pursuant to the programmatic agreement. As an interested party, please provide us with a copy of the report.

Response to Comment 11: Compliance with Section 106 of the National Historic Preservation Act is not a CEQA requirement. However, it is required pursuant to FCC regulations. Section 106 through the FCC's Form 620/621 process is ongoing, but has not yet been completed for Site WAD. Prior outreach was conducted with the City via correspondence dated August 29, 2014. City representatives William Crouch and Reina Kapadia spoke with the Authority's cultural consultant from Jacobs Engineering (Dr. Paige Peyton). If the site is included in the final design, and upon completion of the 620/621 process, the Authority will be in a position to provide updated information to the City of Beverly Hills consistent with state and federal regulations protecting cultural resources.

Comment 12: Under Impact Analysis CUL- 1, it appears that historic resources within the City of Los Angeles were studied, but not within Beverly Hills. Direct and indirect / visual impacts to historic resources to the immediate site (water tower and surroundings) and the adjacent neighborhoods (i.e. Trousdale Estates) in Beverly Hills should be studied and addressed in your analysis.

Response to Comment 12: Historic resources were identified and assessed for impacts within a 0.5 mile radius of site WAD as stipulated in the *Nationwide Programmatic Agreement for Review under the National Historic Preservation Act (2005)* between the Federal Communications Commission, Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers.. The assessment encompassed the water tank site, the surrounding neighborhood, and Trousdale Estates. A discussion of cultural resources is provided in the Draft EIR at Section 3.4, and site-specific impact analysis and recommended mitigation measures are found for Site WAD beginning at page 4-1887. Significant impacts would be reduced to less than significant with incorporation of CUL MM 5 which requires architectural camouflage is required to minimize the visual effects of the proposed increase in the height of the monopole on identified historical resources within the indirect APE. No changes to the Draft EIR are required in response to this comment.



Comment Letter LR-4



**LOS ANGELES REGIONAL INTEROPERABLE
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JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Michael Hofflinger, Associate Planner
City of Chino Hills
14000 City Center Drive
Chino Hills, California 91709

Dear Mr. Hofflinger:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of Chino Hills on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment

Comment Letter LR-4

City of Chino Hills



14000 City Center Drive
Chino Hills, CA 91709
(909) 364-2600
www.chinohills.org

February 25, 2016

Nancy Yang
2525 Corporate Place Suite 100
Monterey Park, CA 91754

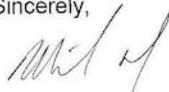
Subject: Land Mobile Radio Project DEIR

Ms. Yang:

Thank you for the opportunity to review the Draft Environmental Impact Report for the Land Mobile Radio Project. After carefully looking at the proposed project, which consists of ninety (90) potential sites for the installation of an emergency radio tower, the City of Chino Hills has the following comments:

- 1 | 1. On page 1-9 under Statutory Exemption sites, Pomona 1620 Hillcrest (PSH) is listed as an exempt location. The remainder of the DEIR does not analyze this location as a potential site for a communication tower, only the Aerojet site (AJT). Please clarify that there is only one (1) site within the City of Chino Hills.
- 2 | 2. On page 2-48 under Comprehensive list of projects within two miles, please update the status of the following projects;
 - a. Stonefield – Post Entitlement Review (Construction/Grading Plan Review)
 - b. Canyon Hills – Under Construction
- 3 | 3. On page 3-434 under Table 3.9-4, Pursuant to Section 16.10.030, the maximum building height for Rural Residential (R-R) zone is 35 feet. Please correct maximum height limit under table. Also on page 4-64 refers to building height.
- 4 | 4. Please note that a Site Development Permit Application will be required if the project will be located on an existing tower or structure. If the proposal includes a new facility, a Conditional Use Permit will be required.

Sincerely,



Michael Hofflinger
Associate Planner

City Council: Art Bennett ▪ Ed M. Graham ▪ Ray Marquez ▪ Cynthia Moran ▪ Peter J. Rogers

Responses to Comment Letter LR-4

The Authority appreciates the City of Chino Hills' comments on the Draft Environmental Impact Report (EIR) dated February 25, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to comments are provided below.

Comment 1: On page 1-9 under Statutory Exemption sites, Pomona 1620 Hillcrest (PSH) is listed as an exempt location. The remainder of the DEIR does not analyze this location as a potential site for a communication tower, only the Aerojet site (AJT). Please clarify that there is only one (1) site within the City of Chino Hills.

Response to Comment 1: The Authority found Site PSH statutorily exempt from CEQA pursuant to Public Resources Code section 21080.25, and a Notice of Exemption was filed with the Los Angeles County Clerk's office on November 13, 2014. None of the sites listed Draft EIR Table 1.3-1, including Site PSH, are analyzed within the EIR, with the exception statutorily exempted LMR sites were considered in the cumulative impact analysis as described in Section 2.7. However, any of the sites identified in Draft EIR Table 1.3-1 could be constructed as part of the LMR System. As noted by the commenter, Site AJT is analyzed in the Draft EIR, with site-specific analysis provided beginning at page 4-38. Therefore, up to two sites, PSH and AJT, may be constructed within the City of Chino Hills as part of the LMR project.

Comment 2: On page 2-48 under Comprehensive list of projects within two miles, please update the status of the following projects; a. Stonefield - Post Entitlement Review (Construction/Grading Plan Review); b. Canyon Hills - Under Construction

Response to Comment 2: The status of the Stonefield and Canyon Hills project in Table 2.7-1 will be updated in the Final EIR per your comments. These revisions to the Final EIR do not result in any new significant impact or an increase in the severity of an environmental impact.

Comment 3: On page 3-434 under Table 3.9-4, Pursuant to Section 16.10.030, the maximum building height for Rural Residential (R-R) zone is 35 feet. Please correct maximum height limit under table. Also on page 4-64 refers to building height.

Response to Comment 3: Response to Comment 3: The Authority concurs that the maximum height should be revised to 35 feet on both pages 3-434 and 4-64 based on the zoning as Rural Residential. This change is consistent with Section 16.10.030 and 16.44.060 of the Chino Hill Development Code that states: "... no major facility may exceed the maximum building height for the applicable zoning district...", which is 35 feet for R-R unless otherwise approved by the planning commission. Since Site AJT is a collocation to an existing tower, i.e., equipment would be installed on an existing lattice tower without exceeding the current overall height of the structure including appurtenances, proposed improvements at this site would still be consistent with Chapter 16.44 of the development code and no other changes to the Draft EIR would be required. These revisions to the Final EIR do not result in any new significant impact or an increase in the severity of an environmental impact.

Comment 4: Please note that a Site Development Permit Application will be required if the project will be located on an existing tower or structure. If the proposal includes a new facility, a Conditional Use Permit will be required.

Response to Comment 4: The information provided by the City regarding permitting is noted.



Comment Letter LR-5



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Mr. Sam Lee, Director
Planning & Building and Safety
City of El Segundo
350 Main Street
El Segundo, California 90245

Dear Mr. Lee:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of El Segundo on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment



Comment Letter LR-5

From: Tagle, Mickie
Sent: Tuesday, February 23, 2016 4:21:02 PM (UTC-08:00) Pacific Time (US & Canada)
To: DraftEIR Hotline
Cc: Lee, Sam
Subject: LA-RICS LMR Project - Draft EIR

Hello,

Three things please:

- 1) Please update your records and replace retired City of El Segundo staff member, Kim Christensen's contact information with Director of Planning & Building Safety, **Sam Lee's**. SLee@ElSegundo.org or 310-524-2345.
- 2) We received and letter subject: Notice of Availability of the Draft Environmental Impact Report. (<http://www.la-rics.org/wp-content/uploads/2016/01/LA-RICS-LMR-DEIR-NOA-FINAL.pdf>)
- 3) I scanned through the DEIR and did not find any of the proposed LMR sites in the City of El Segundo. **Kindly confirm.** (<http://www.la-rics.org/wp-content/uploads/2016/01/LA-RICS-LMR-DEIR-January-2016.pdf>)

Thank you. I'll be on standby for your reply . . .

Mickie Tagle
310-524-2303
mtagle@elsegundo.org

City of El Segundo
350 Main Street
El Segundo, CA 90245

Economic Development www.elsegundobusiness.com
City-wide www.elsegundo.org

Responses to Comment Letter LR-5

The Authority appreciates the City of El Segundo's comments on the Draft Environmental Impact Report (EIR) dated February 23, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: Please update your records and replace retired City of El Segundo staff member, Kim Christensen's contact information with Director of Planning & Building Safety, Sam Lee's. SLee@ElSegundo.org or 310-524-2345.

Response to Comment 1: We have noted the change in staffing for our records. Thank you.

Comment 2: We received and letter subject: Notice of Availability of the Draft Environmental Impact Report. (<http://www.la-rics.org/wp-content/uploads/2016/01/LA-RICS-LMR-DEIR-NOA-FINAL.pdf>)

Response to Comment 2: The commenter's receipt of the Notice of Availability has been noted.

Comment 3: I scanned through the DEIR and did not find any of the proposed LMR sites in the City of El Segundo. Kindly confirm. (<http://www.la-rics.org/wp-content/uploads/2016/01/LA-RICS-LMRDEIR-January-2016.pdf>)

Response to Comment 3: The commenter is correct. There are no LMR sites proposed within the City of El Segundo.



Comment Letter LR-6



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Mr. Chris Jeffers, City Manager
City of Glendora
116 E. Foothill Boulevard
Glendora, California 91741-3380

Dear Mr. Jeffers:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of Glendora on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment

c: Mr. Wayne Leech, City Attorney



Comment Letter LR-6

Telephone: (310) 798-2400
Facsimile: (310) 798-2402

CHATTEN-BROWN & CARSTENS LLP
2200 PACIFIC COAST HIGHWAY
SUITE 318
HERMOSA BEACH, CALIFORNIA 90254
www.cbcearthlaw.com

E-mail:
DPC@CBCEARTH.LAW.COM

February 19, 2016

Nancy Yang
LA-RICS Project Team
2525 Corporate Place, Suite 200
Monterey Park, CA 91754

~~RECEIVED
MAR 23 2016
LA-RICS~~

RECEIVED
FEB 23 2016
LA-RICS

Re: LA-RICS –LMR EIR

Dear Ms. Yang:

We have been retained as special counsel to the City of Glendora (City) with regard to the LA-RICS proposal to construct communication towers in the Los Angeles region.

1 We have previously written to you on March 5, 2015 regarding the potential location of communications towers at three Los Angeles County owned fire stations within City limits has not been sufficiently coordinated with the City. (A copy of this March 5, 2015 letter is attached.) We are pleased to see these communication towers are not among the towers proposed in the EIR for this project. We ask that you immediately contact us, City Attorney Wayne Leech, City Manager Chris Jeffers and Planning Director Jeff Kugel if our understanding is incorrect, or if there is a proposal to change this project to include such towers in the City of Glendora as we would strongly object to such a proposal.

2 With regard to the project as it is set forth now, we note there are two new towers proposed for Johnstone Peak. (DEIR, p. 2-17.) These are set forth as being within the jurisdiction of the US Forest Service. These towers would be visible from the City of Glendora, and would potentially interfere with the operation of a communication tower that the City currently maintains there.

3 Therefore, we ask that more detail be provided about this potential proposal. Specifically, since the original proposal of the LA-RICS project, the national forest in this area has received National Monument status as of October 2014. (<http://news.nationalgeographic.com/news/2014/10/141008-san-gabriel-mountains-national-monument-conservation/>.) We believe additional investigation should be



Comment Letter LR-6

Nancy Yang
February 19, 2016
Page 2

3 initiated to determine if the additional towers at the Johnstone Peak location are compatible with the new, more protective designation of the National Monument.

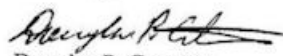
4 Furthermore, we are concerned about the potential for interference of operations- both by physical obstruction and by electromagnetic interference- of tower proposal on Johnstone Peak with the City's current communications tower. Potential mitigation measures should be included to address potential interference with the existing communications tower infrastructure.

Conclusion.

5 The LA-RICS project is obviously important to the future of public safety in the local region. Therefore, the City has been a supportive member of the Joint Powers Authority that is implementing this project, and as helpful as possible to you in carrying it out. However, as a member of the JPA we believe the best project possible, with the least damaging environmental impacts possible, should be developed.

Please feel free to contact City Attorney Wayne Leech or City Manager Chris Jeffers directly about this matter. We ask that you do so as soon as possible.

Sincerely,


Douglas P. Carstens

Cc:
City Council
City Manager
City Attorney
LA RICS Special Counsel Nicole Gordon
LA RICS General Counsel Truc L. More
LA RICS Executive Director Patrick Mallon

Responses to Comment Letter LR-6

The Authority appreciates the City of Glendora’s comments on the Draft Environmental Impact Report (EIR) dated February 19, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to comments are provided below.

Comment 1: We have previously written to you on March 5, 2015 regarding the potential location of communications towers at three Los Angeles County owned fire stations within city limits has not been sufficiently coordinated with the City. (A copy of this March 5, 2015 letter is attached.) We are pleased to see these communication towers are not among the towers proposed in the EIR for this project. We ask that you immediately contact us, City Attorney Wayne Leech, City Manager Chris Jeffers and Planning Director Jeff Kugel if our understanding is incorrect, or if there is a proposal to change this project to include such towers in the City of Glendora as we would strongly object to such a proposal.

Response to Comment 1: The Authority received the letter sent on March 5, 2015, which contained comments related to the LA-RICS Public Safety Broadband Network (PSBN), also known as the Long Term Evolution (LTE) communications system project, and responded via letter dated March 13, 2015. The previously approved LTE system is a separate project from the LA-RICS Land Mobile Radio (LMR) system project that is the subject of the current EIR. Construction of the LTE Project began in December 2014 and was completed in December 2015. No LTE facilities were constructed in the City of Glendora.

Similarly, there are no LMR sites proposed within the City of Glendora.

Comment 2: With regard to the project as it is set forth now, we note there are two new towers proposed for Johnstone Peak. (DEIR, p.2-17.) These are set forth as being within the jurisdiction of the US Forest Service. These towers would be visible from the City of Glendora, and would potentially interfere with the operation of a communication tower that the City currently maintains there.

Response to Comment 2: The Draft EIR analyzes two LMR facilities identified as Johnstone Peak-1 (JPK) and Johnstone Peak-2 (JPK2). As explained in Draft EIR section 2.3 (p. 2-41), the Authority would construct a new LMR lattice tower at only one of the two proposed sites on Johnstone Peak. At either of these sites, the tower could be visible from the City of Glendora, as well as from other observation points. The Draft EIR concludes that impacts to aesthetic resources from project construction at either of these sites would be less than significant, as noted in Draft EIR pages 4-724 through 4-726, and 4-763 through 4-765. Regarding interference, the frequencies used by the antennas to be mounted on any tower installed at Johnstone Peak will be reviewed as part of the FCC licensing process, which sets standards to preclude potential interference to existing communications infrastructure.

Comment 3: Therefore, we ask that more detail be provided about this potential proposal. Specifically since the original proposal of the LA-RICS project, the national forest in this area has received National Monument status as of October 2014. (<http://news.nationalgeographic.com/news/2014110/141008-san-gabriel-mountainsnational-monument-conservation/>.) We believe additional investigation should be initiated to determine if the additional towers at the Johnstone peak location are compatible with the new, more protective designation of the National Monument.

Responses to Comment Letter LR-6

Response to Comment 3: The Authority is aware that sites JPK and JPK2 are on lands designated as a National Monument in October 2014, and this fact is referenced several times in the Draft EIR where relevant to the analysis of environmental impacts (an example is provided at page 3-106). The Authority will continue to work with the U.S. Forest Service during the permitting process for LMR communications infrastructure developed at Johnstone Peak. The commenter may wish to note the federal register proclamation (emphasis added) that created the San Gabriel Mountains National Monument found at [\[https://federalregister.gov/a/2014-24849\]](https://federalregister.gov/a/2014-24849) states:

“Nothing in this proclamation shall be construed to interfere with the operation or maintenance, nor with the replacement or modification within the existing authorization boundary, of existing water resource, flood control, utility, pipeline, or telecommunications facilities that are located within the monument, subject to the Secretary of Agriculture’s special uses authorities and other applicable laws. Existing water resource, flood control, utility, pipeline, or telecommunications facilities located within the monument may be expanded, and new facilities may be constructed within the monument, to the extent consistent with the proper care and management of the objects protected by this proclamation, subject to the Secretary of Agriculture’s special uses authorities and other applicable law.”

As summarized in Draft EIR Table ES-2, starting on page ES-36, all environmental impacts at sites JPK and JPK2 will be less than significant with incorporation of appropriate mitigation.

Comment 4: Furthermore, we are concerned about the potential for interference of operations both by physical obstruction and by electromagnetic interference of tower proposal on Johnstone Peak with the City’s current communications tower. Potential mitigation measures should be included to address potential interference with the existing communications tower infrastructure.

Response to Comment 4: This comment addresses mechanical interference, which is not an environmental issue that requires a response for purposes of CEQA (CEQA Guidelines §15088). Nevertheless, the FCC licensing process, as well as the U.S. Forest Service special use permit application review process require coordination among frequency licensees and between a permit applicant and existing permit holders, respectively, to avoid interference. Any LMR installation at Johnstone Peak would comply with both processes.

Comment 5: The LA-RICS project is obviously important to the future of public safety in the local region. Therefore, the City has been a supportive member of the Joint powers Authority that is implementing this project, and as helpful as possible to you in carrying it out. However, as a member of the JPA we believe the best project possible, with the least damaging environmental impacts possible, should be developed.

Response to Comment 5: The Authority appreciates the support of the City of Glendora. The Authority will continue to comply with CEQA and all other applicable regulatory requirements in development of the LMR system.



Comment Letter LR-7



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Mr. Brian James, Planning Director
City of Industry
15625 E. Stafford Street
Industry, California 91744-0366

Dear Mr. James:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of Industry on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment



Comment Letter LR-7

DraftEIR Hotline

From: Brian D James <BJames@cityofindustry.org>
Sent: Tuesday, January 26, 2016 9:59 AM
To: DraftEIR Hotline
Subject: Comments on the EIR for the Los Angeles Regional Interoperable Communications System (LA-RICS) proposed Land Mobile Radio system

Thank you for providing the Draft Environmental Impact Report (EIR) for the Los Angeles Regional Interoperable Communications System (LA-RICS) proposed Land Mobile Radio (LMR) system. Please accept the following comments on the Draft EIR:

- 1 | • Two facilities were found statutorily exempt and have already been constructed in the City of Industry. These are not addressed at all in the EIR, specifically section 1.3.2 and Table 1.3-1. These facilities should be accounted for in the LA-RICS system design and appear not to be.
- 2 | • Neither the City of Industry nor its planning director were consulted on the preparation of the EIR. We were consulted during the construction of the facilities in the City but had no input or knowledge about the review and processing of the system discussed in the EIR. Please remove the City from Section 6 of the EIR.

Brian James
Planning Director

City of Industry
15625 E. Stafford Street
Industry, CA 91744-0366
626-333-2211 | 626-961-6795 (F)
bdjames@cityofindustry.org
www.cityofindustry.org

Responses to Comment Letter LR-7

The Authority appreciates the City of Industry’s comments on the Draft Environmental Impact Report (EIR) dated January 26, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: Two facilities were found statutorily exempt and have already been constructed in the City of Industry. These are not addressed at all in the EIR, specifically section 1.3.2 and Table 1.3-1. These facilities should be accounted for in the LA-RICS system design and appear not to be.

Response to Comment 1: The Authority is not currently proposing or planning to construct any LMR sites in the City of Industry. However, the Authority has constructed one LA-RICS Long Term Evolution (LTE) site in the City. This is LTE Site LASDIDT, located at the Los Angeles County Sheriff’s Industry Station at 150 N. Hudson Street in the City of Industry, which was constructed in 2015. The LTE and the LMR systems are two separate regional communications projects being carried out by the Authority. The LTE system is a wireless day-to-day broadband data communications system for use on a variety of platforms, including cellular smart phones, tablets, and other computers. The LMR system is also dedicated to public safety but is a wireless voice communications system for mobile and portable devices such as walkie-talkies and two-way radios. These independent projects are funded through different federal agencies through individual grant processes.

The Authority found LTE Site LASDIDT statutorily exempt from CEQA pursuant to Public Resources Code section 21080.25, and a Notice of Exemption was filed with the Los Angeles County Clerk’s office on March 6, 2014. Therefore this site is identified in the list of statutorily exempt sites in Table 1.3.1 in the Draft EIR, and it is not described further or analyzed in the Draft EIR. LTE Site LASDIDT was also analyzed under NEPA in the Broadband Technology Opportunities Program (BTOP) Environmental Assessment (EA) dated October 2014, for which the National Telecommunications & Information Administration (NTIA) issued a Finding of No Significant Impact (FONSI) on July 10, 2015.

Comment 2: Neither the City of Industry nor its planning director were consulted on the preparation of the EIR. We were consulted during the construction of the facilities in the City but had no input or knowledge about the review and processing of the system discussed in the EIR. Please remove the City from Section 6 of the EIR.

Response to Comment 2: The Authority’s environmental consultant, Jacobs Engineering, contacted Brian James, Planning Director for the City of Industry, via email on November 10, 2015 to request information about upcoming projects in the City for purposes of preparing the cumulative impacts analysis for the EIR. Mr. James provided a list of upcoming projects to the preparers of the EIR via return email on November 10, 2015. The projects on the list provided by the City of Industry were considered in the cumulative impact analysis conducted for the Draft EIR.



Comment Letter LR-8



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Mr. Kit Fox, AICP
Senior Administrative Analyst
City of Rancho Palos Verdes
30940 Hawthorne Boulevard
Rancho Palos Verdes, California 90275-5391

Dear Mr. Fox:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of Rancho Palos Verdes on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

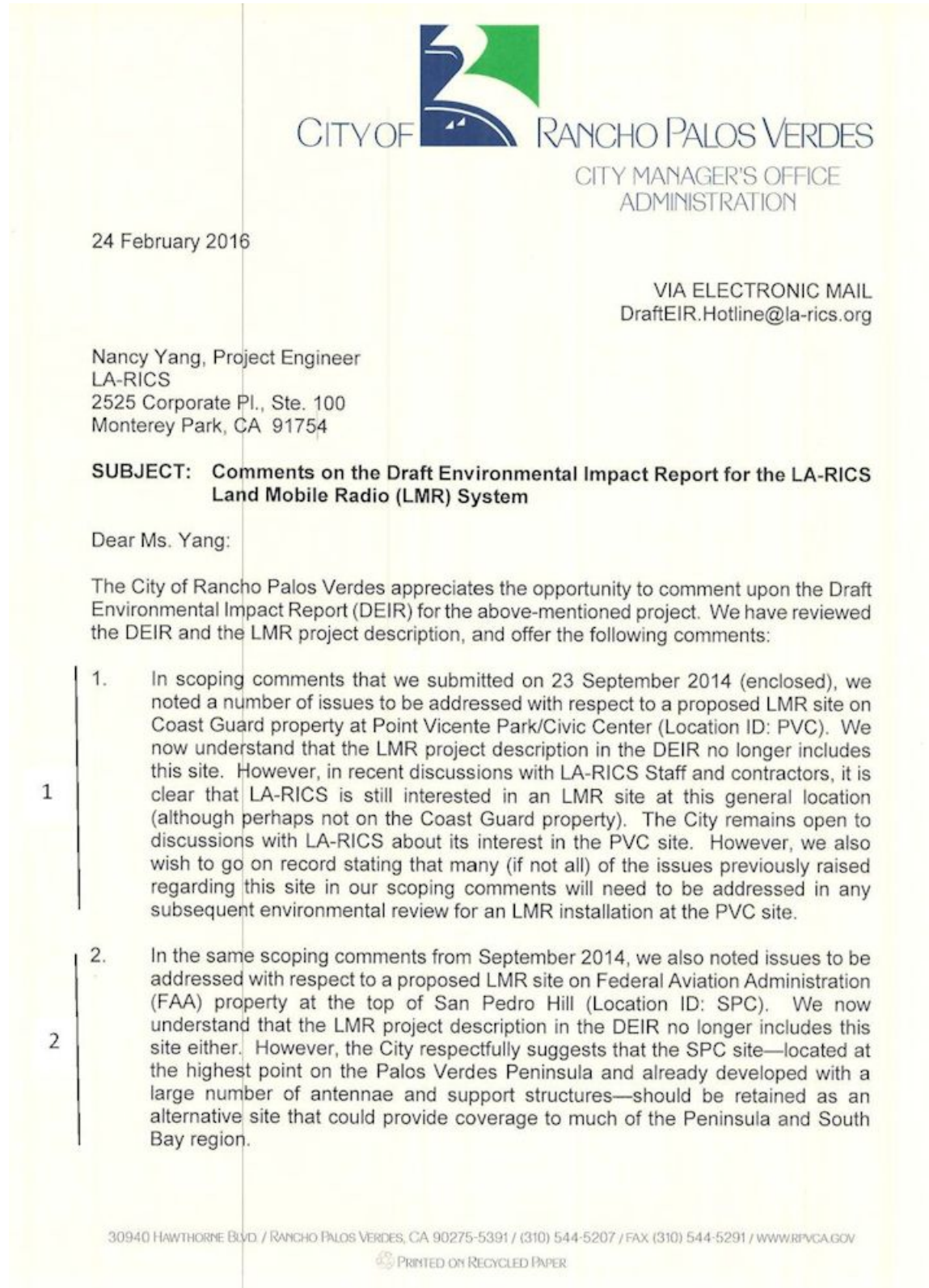
A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment



Comment Letter LR-8





Comment Letter LR-8

Nancy Yang
24 February 2016
Page 2

3

3. In September 2014, we also noted concerns regarding a proposed LMR site at the County "antenna farm" at 5741 Crestridge Road (Location ID: RHT), primarily related to aesthetics, biological resource impacts, and land use and planning. We now understand that LA-RICS has determined that the RHT site is statutorily exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Public Resources Code §21080.25, and will not be addressed in the DEIR. Notwithstanding this determination, the City believes that the issues raised in our scoping comments (enclosed) should be addressed before this LMR installation is constructed. Furthermore, we are concerned that the public outreach efforts undertaken by LA-RICS regarding the RHT site in December 2015 were inadequate. We have recently provided LA-RICS with addresses for several homes on Mistridge Drive and contact information for the *Mesa Palos Verdes* homeowners' association, all of whom should be apprised of LA-RICS' plans for the RHT site.

Again, thank you for the opportunity to comment upon this important project. If you have any questions or need additional information, please feel free to contact me at (310) 544-5226 or via e-mail at kittf@rpvca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kit Fox", is written over a light blue circular stamp.

Kit Fox, AICP
Senior Administrative Analyst

enclosure

cc: Mayor Ken Dyda and Rancho Palos Verdes City Council
Doug Willmore, City Manager
Gabriella Yap, Deputy City Manager
Terry Rodrigue, Interim Community Development Director
Ara Mihranian, Deputy Community Development Director

M:\Municipal Services\Emergency Communications\LA-RICS\20160224_Yang_DEIRComments.docx

Responses to Comment Letter LR-8

The Authority appreciates the City of Rancho Palms Verdes' comments on the Draft Environmental Impact Report (EIR) dated February 24, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to comments are provided below.

Comment 1: In scoping comments that we submitted on 23 September 2014 (enclosed), we noted a number of issues to be addressed with respect to a proposed LMR site on Coast Guard property at Point Vicente Park/Civic Center (Location ID: PVC). We now understand that the LMR project description in the DEIR no longer includes this site. However, in recent discussions with LA-RICS Staff and contractors, it is clear that LA-RICS is still interested in an LMR site at this general location (although perhaps not on the Coast Guard property). The City remains open to discussions with LA-RICS about its interest in the PVC site. However, we also wish to go on record stating that many (if not all) of the issues previously raised regarding this site in our scoping comments will need to be addressed in any subsequent environmental review for an LMR installation at the PVC site.

Response to Comment 1: Site PVC is no longer under consideration as part of the proposed project, and no replacement site has been proposed for inclusion in the LMR system. In the event a replacement site is identified, any approval of the site would be subject to CEQA, as applicable.

Comment 2: In the same scoping comments from September 2014, we also noted issues to be addressed with respect to a proposed LMR site on Federal Aviation Administration (FAA) property at the top of San Pedro Hill (Location ID: SPC). We now understand that the LMR project description in the DEIR no longer includes this site either. However, the City respectfully suggests that the SPC site - located at the highest point on the Palos Verdes Peninsula and already developed with a large number of antennae and support structures - should be retained as an alternative site that could provide coverage to much of the Peninsula and South Bay region.

Response to Comment 2: Site SPC is no longer in consideration as part of the proposed project, and no replacement site has been proposed for inclusion in the LMR system. The Authority notes the City's support for LMR facilities at Site SPC.

Comment 3: In September 2014, we also noted concerns regarding a proposed LMR site at the County "antenna farm" at 5741 Crestridge Road (Location ID: RHT), primarily related to aesthetics, biological resource impacts, and land use and planning. We now understand that LA-RICS has determined that the RHT site is statutorily exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Public Resources Code §21080.25, and will not be addressed in the DEIR. Notwithstanding this determination, the City believes that the issues raised in our scoping comments (enclosed) should be addressed before this LMR installation is constructed. Furthermore, we are concerned that the public outreach efforts undertaken by LA-RICS regarding the RHT site in December 2015 were inadequate. We have recently provided LA-RICS with addresses for several homes on Mistridge Drive and contact information for the *Mesa Palos Verdes* homeowners' association, all of whom should be apprised of LA-RICS' plans for the RHT site.

Response to Comment 3: As noted in the commenter's comments, Site RHT was found to be statutorily exempt from CEQA. Although statutorily exempt sites are not included in the project level analysis provided in the Draft EIR, numerous environmental criteria had to be met for a site to qualify for the statutory exemption, including criteria related to biological resources. Additionally, all of the statutorily



Responses to Comment Letter LR-8

exempt LMR sites are considered, where appropriate, in the cumulative impact analysis (see cumulative impacts analyses provided within resource topics in Chapters 2 and 3 of the Draft EIR). Because the Site RHT is exempt from analysis in the EIR, the Authority is not required to respond to the City’s scoping comments on Site RHT. However, the comments will be provided to the Authority’s decision makers for their consideration in connection with the LMR project, and the Authority will continue to work with stakeholders associated with Site RHT prior to and during construction and operations of the site.



Comment Letter LR-9



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Ms. Wendy Starks
Associate Planner
City of Rolling Hills
2 Portuguese Bend Road
Rolling Hills, California 90274

Dear Ms. Starks:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of Rolling Hills on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment



Comment Letter LR-9

Joann Huerta

From: DraftEIR Hotline
Sent: Friday, February 12, 2016 9:48 AM
To: Joann Huerta; Beatriz Cojulun; Priscilla Lara; Wendy Stallworth-Tait
Subject: FW: LA-RICS Draft EIR

From: Wendy Starks
Sent: Friday, February 12, 2016 9:46:12 AM (UTC-08:00) Pacific Time (US & Canada)
To: DraftEIR Hotline
Subject: LA-RICS Draft EIR

1 | I am reviewing the draft EIR for the LA-RICS project. I do not see the City of Rolling Hills listed as a potential site for location of a LMR facility and I want to confirm that The City of Rolling Hills is not being considered in the EIR as a potential site.

Thank you.
Wendy Starks

--

Wendy Starks, Associate Planner

City of Rolling Hills, 2 Portuguese Bend Road, Rolling Hills, CA 90274

310-377-1521 Fax: 310-377-7288 www.Rolling-Hills.org

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WARNING: Computer viruses can be transmitted by e-mail. The recipient should check this e-mail and any attachments for the presence of viruses. The CITY OF ROLLING HILLS accepts no liability for any damage caused by any virus transmitted by this e-mail.



Responses to Comment Letter LR-9

The Authority appreciates the City of Rolling Hills' comments on the Draft Environmental Impact Report (EIR) dated February 12, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: I am reviewing the draft EIR for the LA-RICS project. I do not see the City of Rolling Hills listed as a potential site for location of a LMR facility and I want to confirm that The City of Rolling Hills is not being considered in the EIR as a potential site.

Response to Comment 1: The commenter is correct. No LMR sites have been identified in the Draft EIR for construction within the City of Rolling Hills, and the Authority is not currently proposing or planning to construct any LMR sites in the City of Rolling Hills.



Comment Letter LR-10



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Mr. David Wahba, Director
Planning, Building and Safety, Zoning and Code Administration
City of Rolling Hills Estates
4045 Palos Verdes Drive North
Rolling Hills Estates, California 90274

Dear Mr. Wahba:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of Rolling Hills Estates on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment



Comment Letter LR-10

From: David Wahba [<mailto:davidw@ci.rolling-hills-estates.ca.us>]
Sent: Wednesday, January 13, 2016 11:01 AM
To: DraftEIR Hotline <DraftEIR.Hotline@LA-RICS.ORG>
Subject: Request for more info on the RHT site

Hi,

1 | I am interested in what the facility will involve and look like at the RHT (Rolling Hills Transmit) site located at 5741 Crestridge Rd. in the City of RPV. I note that the EIR lists this site as Statutorily Exempt, so I presume the EIR is silent on this one??. I presume it is simply going on one of the existing antenna stands/towers given that this is already an antenna farm. Please advise.

Thanks,
David Wahba

David Wahba

Director of Planning, Building & Safety, Zoning and Code Administration | City of Rolling Hills Estates | 4045 Palos Verdes Drive North | Rolling Hills Estates | CA | 90274

310.377.1577 ext. 103 | 310.377.4468 (FAX) | davidW@RollingHillsEstatesCa.gov | www.RollingHillsEstatesCa.gov



Responses to Comment Letter LR-10

The Authority appreciates the City of Rolling Hills Estates' comments on the Draft Environmental Impact Report (EIR) dated January 13, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Comment 1: I am interested in what the facility will involve and look like at the RHT (Rolling Hills Transmit) site located at 5741 Crestridge Rd. in the City of RPV. I note that the EIR lists this site as Statutorily Exempt, so I presume the EIR is silent on this one??. I presume it is simply going on one of the existing antenna stands/towers given that this is already an antenna farm. Please advise.

Response to Comment 1: On November 13, 2014, the Authority found LMR Site RHT statutorily exempt from CEQA pursuant to Public Resources Code section 21080.25, and a Notice of Exemption was filed with the Los Angeles County Clerk's office on November 14, 2014. Therefore, this site is identified in the list of statutorily exempt LMR sites in Table 1.3.1 in the Draft EIR, and it is not described further or analyzed in the EIR. Current design for project implementation at Site RHT includes construction of a new, up to 180-foot lattice tower and related infrastructure and related site development including equipment shelter, emergency generator, and other site improvements.



Comment Letter LR-11



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Mr. Scott Charney, Director
Community Development Department
City of Signal Hill
2175 Cherry Avenue
Signal Hill, California 90755-3799

Dear Mr. Charney:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of Signal Hill on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment

Comment Letter LR-11



CITY OF SIGNAL HILL

2175 Cherry Avenue • Signal Hill, CA 90755-3799

February 25, 2016

VIA EMAIL: DraftEIR.Hotline@la-rics.org

Los Angeles
Regional Interoperable Communications System
Joint Powers Authority
Attn: Ms. Nancy Yang
2525 Corporate Place, Suite 100
Monterey Park, CA 91754

RE: LOS ANGELES REGIONAL INTEROPERABLE COMMUNICATIONS SYSTEM
LAND MOBILE RADIO PROJECT DRAFT ENVIRONMENTAL IMPACT
REPORT

Dear Ms. Yang:

The City of Signal Hill has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Los Angeles Regional Interoperable Communications System (LA-RICS). The following is a summary of the City of Signal Hill's (the "City") comments related to the project.

Jurisdiction

The Land Mobile Radio tower proposed to be altered (the SGH tower) is located within the City of Signal Hill. The tower is both owned and operated by the City of Long Beach, a municipal corporation however, it is located on property that is jointly owned by GTE CALIFORNIA INC and THE CITY OF LONG BEACH.

Historically, Long Beach has been the permitting authority for the tower and the City of Long Beach has not contacted us to request, or authorize a shift in that permitting authority. Accordingly, the Long Beach tower does not have a CUP or similar entitlement from the City of Signal Hill.

Comment:

- A copy of the draft and final EIR should be distributed to the City of Long Beach's Department of Technology and Innovation.



Comment Letter LR-11

LA-RICS DEIR Comments
Page 2

Alternative Sites for Signal Hill

2 | The location of the SGH tower is unique from other tower locations studied in the DEIR, in that it is surrounded by residentially zoned property and existing single-family and multi-family dwellings and also has a second antenna tower directly adjacent to it at 2411 Skyline Drive. No other sites appear to have existing residential uses directly adjacent on all sides.

Comments:

- 3 | • The DEIR for the SGH tower should analyze any hazards related to human health impacts and expected nuisances that could impact the adjacent residences and should include the cumulative impacts from the adjacent antenna tower.
- 4 | • The DEIR does not consider alternative site locations in lieu of the location identified for the SGH tower on Stanley Avenue.
- 4 | • The City is requesting that LA-RICS conduct a due diligence investigation to identify alternative sites that are not in, or surrounded by any residential zoning districts.

Design

5 | The DEIR presents a "worst case scenario", proposing the maximum number of necessary equipment to be installed at each site.

Comments:

- 5 | • Upon receipt of the final LA-RICS tower design and prior to the issuance of any building permits, the City of Signal Hill shall be provided with the design details for the SGH tower, including but not limited to the tower height, number, type and size of equipment (microwave antennas and whips) and diesel generator size and fuel tank storage size.
- 6 | • The impacts related to noise, construction impacts, area of disturbance and excavation shall also be disclosed.
- 7 | • Upon receipt of the final LA-RICS tower design, LA-RICS shall coordinate with the City of Signal Hill to schedule and conduct a second a community meeting, in the City of Signal Hill to provide the community with information about the design.

Health Impacts from Radio Frequency Emissions

Comments:

- 8 | • Upon completion of the proposed design and prior to the issuance of building permits by the City of Long Beach, the City of Signal Hill requests a copy of the Radio Frequency (RF) emission safety study, to demonstrate that the existing RF emission level from all equipment on site complies with the Federal Communications Commission (FCC) guidelines and regulations on Maximum Permissible Exposure for the General Public/Uncontrolled and for the Occupational/Controlled groups per the FCC's Office of Engineering and Technology Bulletin 65.



Comment Letter LR-11

LA-RICS DEIR Comments
Page 3

- 9 | • RF emission levels should be measured from the 20' level as well as from the ground, since the surrounding uses are two-story homes and should include the cumulative emissions from both the SGH tower and the adjacent antenna tower.
- 10 | • Prior to operation of any new equipment, the City of Signal Hill shall be provided with a copy of the report confirming that RF emission levels are in compliance with FCC regulations.
- 11 | • Confirmation that continued regular measurements of emissions will be conducted by certified professionals.

Compounded Radio Frequency Emissions
Comments:

- 12 | • All RF studies should be coordinated with the operator of the adjacent antenna tower at 2411 Skyline Drive, which is immediately adjacent to the subject site.
- 13 | • Specifically, the RF reports should study exposure rates for the General Public if both sites were at full capacity with antennas, whips and or other emitting equipment. A discussion on compounded RF Emissions is not included in the DEIR.
- 14 | • LA-RICS should include details of the procedures, equipment used, regularity, and methods of communicating the results of emissions monitoring before and after installation of equipment at the requested community meeting, or shall coordinate with the City of Signal Hill to conduct a third community meeting with these details.

Coverage Map & Interference

The DEIR does not include a map showing how the SGH tower will provide improved coverage and capacity to the immediate community.

Comments:

- 15 | • A map should be included within the DEIR showing improved coverage and identifying areas of concern where coverage would likely be lost during high emergency use.
- 16 | • The DEIR should discuss how interference issues will be addressed. Particularly, interference with frequencies used by residents for cable, radio, phone and or internet services.

Tower Location and Proximity to the Airport

Comment:

- 17 | • Prior to the issuance of building permits by the City of Long Beach, the City of Signal Hill requests a copy of the Federal Aviation Administration determination of no hazard to air navigation letter or flight operations for any extension of the tower and/or lighting rod (per HAZ Mitigation Measure 2).

Fuel Tank and Proximity to Residential Dwellings

Comment:

- 18 | • Fuel tanks shall be installed in accordance with California Fire Code and applicable hazardous material storage ordinances.



Comment Letter LR-11

LA-RICS DEIR Comments
Page 4

- 19 | • Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks adjacent to residential dwellings and active oil wells shall be implemented.
- 20 | • If the tank is greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, a copy of the spill prevention, control and countermeasure plan shall be submitted to the City.

Construction

The City and community should be informed of what to expect during construction and excavation.

Comments:

- 21 | • Contact information for the contractor and/or project manager should be provided to report any issues during construction.
- 22 | • Prior to the start of any evening or weekend work, both the City and community should be notified in writing of construction activities expected to occur (between 6 p.m. and 7 a.m. or weekends).

Operations and Maintenance

Comments:

- 23 | • The DEIR does not describe what noise mitigation there will be for the diesel motor and any other air conditioning, electrical equipment etc. to reduce operational noise to below the 55dBA (ambient noise required by the Signal Hill Municipal Code).
- 24 | • The DEIR does not describe details for maintaining security at the SGH site.
- 25 | • The DEIR does not describe annual RF emission reports that will be conducted to ensure that the tower is operating at a safe level as prescribed by the FCC. The City would like a copy of all annual RF emission reports.

Follow-Up Community Meeting Requested

Comment:

- 26 | • Upon receipt of the final LA-RICS tower design and prior to the issuance of any building permits, the City of Signal Hill requests that the LA-RICS Authority hold at least one additional community meeting to provide the local community (including the Promontory/Skyline Estates Homeowners Association) with information about the final design, share the results of any studies and answer any questions requested in this letter.

Other Comments

- 27 | The following updates (shown with strikeouts for deletions and red text for additions) to the DEIR are requested for administrative purposes:



Comment Letter LR-11

LA-RICS DEIR Comments
Page 5

Project Description

Jurisdiction

Page 1-11

Local Agencies

- City of Long Beach

Page 2-18

Table 2.1-1

Site ID	Site Name	Street	City	Zip Code	Jurisdiction
SGH	Signal Hill	2321 Stanley Ave.	Signal Hill	90755	Signal Hill Long Beach

Page 4-1487

Jurisdiction: City of Long Beach

Landowner(s): GTE California Inc and Long Beach City

Page 4-1505

GEO-2 Discussion:

27

Construction plans would be reviewed by the City of Long Beach Signal Hill planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing storm drain inlets.

Page 4-1514

Local Agency Jurisdiction: Long Beach Signal-Hill

Zoning: Hilltop Area Specific Plan, Antenna and Microwave Consolidation/Park Site

Note: The Hilltop Area Specific Plan includes view protection provisions, but the City of Signal Hill is not administering permits for the project.

3.12 Transportation/Traffic Page 3-516

Circulation Element, Scenic Routes – designates Skyline Drive, immediately south of the project site as a scenic route.

4.0 Chapter 4 Site Summary Forms

Page 4-1524

Nearest Solid Waste Disposal Facility: EDCO Disposal, 2755 California Ave, Signal Hill, CA 90755

Page 3-372

Table 3.7-4 Proposed Project Sites

Correct Address Section: Signal Hills



Comment Letter LR-11

LA-RICS DEIR Comments
Page 6

The City of Signal Hill recognizes the importance of a public communications system and looks forward to receiving the information requested in this letter. We appreciate that LA-RICS conducted a community meeting for interested residents and look forward to coordination of a second community meeting. Should you have any questions or comments regarding the comments please contact me at 562-989-7343 or scharney@cityofsignalhill.org. Please direct any response to comments to my attention and send a copy of the Final EIR.

Regards,

A handwritten signature in blue ink, appearing to read "Scott Charney", with a long horizontal flourish extending to the right.

Scott Charney
Director of Community Development

cc: City Manager
Chief of Police

Responses to Comment Letter LR-11

The Authority appreciates the City of Signal Hill's comments on the Draft Environmental Impact Report (EIR) dated February 25, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to comments are provided below.

Comment 1: The Land Mobile Radio tower proposed to be altered (the SGH tower) is located within the City of Signal Hill. The tower is both owned and operated by the City of Long Beach, a municipal corporation however, it is located on property that is jointly owned by GTE CALIFORNIA INC and THE CITY OF LONG BEACH.

Historically, Long Beach has been the permitting authority for the tower and the City of Long Beach has not contacted us to request, or authorize a shift in that permitting authority. Accordingly, the Long Beach tower does not have a CUP or similar entitlement from the City of Signal Hill.

Comment:

A copy of the draft and final EIR should be distributed to the City of Long Beach's Department of Technology and Innovation.

Response to Comment 1: The comment is noted

The Draft EIR is available on the Authority's website (www.la-rics.org). If the Authority certifies the Final EIR and approves the project, a Notice of Determination and the Final EIR will be filed with the Los Angeles County Clerk and the San Bernardino County Clerk. The Final EIR will also be posted on the Authority's website where it will be available to all interested parties, including the City of Long Beach. Permitting for the project will be undertaken by the Authority following certification of the EIR and project approval.

Comment 2: The location of the SGH tower is unique from other tower locations studied in the DEIR, in that it is surrounded by residentially zoned property and existing single-family and multi-family dwellings and also has a second antenna tower directly adjacent to it at 2411 Skyline Drive. No other sites appear to have existing residential uses directly adjacent on all sides.

Comments:

The DEIR for the SGH tower should analyze any hazards related to human health impacts and expected nuisances that could impact the adjacent residences and should include the cumulative impacts from the adjacent antenna tower.

Response to Comment 2: While each LMR site included in the Draft EIR is unique, other sites analyzed in the Draft EIR, such as SDW and WAD, are similar to site SGH in that they are located in residential areas with residences adjacent.

Draft EIR Section 3.7.4 – Impact Analysis for Hazards and Hazardous Materials, starting on page 3-382, under HAZ-1, HAZ-2 and HAZ-3, provides an analysis of significant hazards to the public (including residents) or environment for various hazards related to human health. Specific hazards for Site SGH are identified and discussed, beginning on page 4-1508. Hazards associated with transport of diesel fuel to the site would be reduced to a less than significant impact through implementation of regulations and

Responses to Comment Letter LR-11

requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination. The fuel tank within the generator would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Impacts from hazardous material transport and use on the site would be less than significant. The site is not within 0.25 mile of a school; therefore no impacts to schools would occur from diesel fuel use on the site.

Nuisances are not an environmental impact that require analysis under CEQA. However, the Draft EIR analyzes site-specific impacts from noise, starting on page 4-1516, and dust, starting on page 4-1531. Section 3.7.5, Cumulative Impacts, also provides an analysis of the potential impacts from identified hazards. This analysis considered potential impacts from adjacent antennas within the geographic boundary as defined in Section 3.7.5.1, as appropriate depending on the hazard and hazardous material discussed. Other potential cumulative impacts associated with adjacent antennas, such as aesthetics, are discussed in Section 3.1.4 starting on page 3-26.

Comment 3: The DEIR does not consider alternative site locations in lieu of the location identified for the SGH tower on Stanley Avenue.

Response to Comment 3: CEQA requires analysis of alternatives that would reduce or avoid significant effects of the proposed project. The Draft EIR did not identify any significant effects at Site SGH that cannot be mitigated by the mitigation measures identified in the Draft EIR. Therefore, CEQA does not require the Authority to identify an alternative to Site SGH. Additionally, the Authority explored numerous options for providing LMR coverage to the cities of Signal Hill and Long Beach area. The Authority conducted a candidate site search in the area to identify potential sites that provided coverage to areas that could not be covered by other planned sites. No other viable sites were identified that could provide LMR coverage equivalent to Site SGH. However, the Authority analyzed more sites in the Draft EIR than would ultimately be constructed, effectively analyzing numerous alternative sites.

Comment 4: The City is requesting that LA-RICS conduct a due diligence investigation to identify alternative sites that are not in, or surrounded by any residential zoning districts.

Response to Comment 4: Early and throughout the planning process, searches were conducted in the Los Angeles County area for sites suitable for inclusion in the LMR system. Alternative locations were identified and analyzed in the Draft EIR for many sites, when those alternatives were available. Examples of this include sites H-69B and SPN, where one served as an alternative to the other, and both were analyzed. For Site SGH, no suitable alternative location was identified for analysis.

Comment 5: The DEIR presents a "worst case scenario", proposing the maximum number of necessary equipment to be installed at each site.

Comments:

Upon receipt of the final LA-RICS tower design and prior to the issuance of any building permits, the City of Signal Hill shall be provided with the design details for the SGH tower, including but not limited to the tower height, number, type and size of equipment (microwave antennas and whips) and diesel generator size and fuel tank storage size.

Responses to Comment Letter LR-11

Response to Comment 5: The commenter is correct in that the Draft EIR provides a design scenario that allows for a conservative estimate of impacts using reasonable assumptions. The Authority will continue to work with the City of Signal Hill and will provide, as appropriate, information regarding tower and other site design details. No change to the Draft EIR is required as a result of this comment.

Comment 6: The impacts related to noise, construction impacts, area of disturbance and excavation shall also be disclosed.

Response to Comment 6: A complete site-specific impact analysis for Site SGH has been provided, beginning at page 4-1487 of the Draft EIR. The analysis for each resource is provided for both construction and operations activities. Impacts from construction activity are based on analysis that includes the area of disturbance and excavation activity as relevant to the resource topic. The analysis discusses the noise level estimated under a maximum construction activity scenario at proposed Site SGH to the nearest noise-sensitive receiver, which is 89 dBA within 25 feet of the site boundary. The actual construction noise level will not exceed this estimated level. Also discussed in the site-specific analysis, operational noise from the site would be within background levels.

Comment 7: Upon receipt of the final LA-RICS tower design, LA-RICS shall coordinate with the City of Signal Hill to schedule and conduct a second a community meeting, in the City of Signal Hill to provide the community with information about the design.

Response to Comment 7: Upon completion of design and prior to construction, the Authority will coordinate additional community meeting(s) and other outreach efforts with residents of the City of Signal Hill.

Comment 8: Upon completion of the proposed design and prior to the issuance of building permits by the City of Long Beach, the City of Signal Hill requests a copy of the Radio Frequency (RF) emission safety study, to demonstrate that the existing RF emission level from all equipment on site complies with the Federal Communications Commission (FCC) guidelines and regulations on Maximum Permissible Exposure for the General Public/Uncontrolled and for the Occupational/Controlled groups per the FCC's Office of Engineering and Technology Bulletin 65.

Response to Comment 8: As described in Section 5.3 of the Draft EIR, the Authority will manage radiofrequency (RF) electromagnetic energy (EME) radiation in accordance with applicable guidance found at the Federal Communication Commission's Office of Engineering and Technology (OET) Bulletin 65. This will include desktop analysis of RF exposures inclusive of all equipment at the site (including new LMR equipment) prior to construction and confirmatory sampling of RF exposures upon completion of construction to ensure exposures are within regulatory requirements for workers and the public. This information will be provided when available to the City of Signal Hill.

Comment 9: RF emission levels should be measured from the 20' level as well as from the ground, since the surrounding uses are two-story homes and should include the cumulative emissions from both the SGH tower and the adjacent antenna tower.

Response to Comment 9: As noted in response to Comment 8, all RF exposure testing will be conducted in accordance with applicable guidelines, which include consideration of nearest receptors.

Responses to Comment Letter LR-11

Comment 10: Prior to operation of any new equipment, the City of Signal Hill shall be provided with a copy of the report confirming that RF emission levels are in compliance with FCC regulations.

Response to Comment 10: Testing for RF exposures will be conducted in accordance with OET Bulletin 65, as described in the response to comment 8. The Authority will provide the City with findings associated with both design-based desktop analyses and confirmatory sampling conducted upon completion of construction at Site SGH. As noted in Section 5.3 of the Draft EIR, RF EME will be managed in accordance with all applicable regulations.

Comment 11: Confirmation that continued regular measurements of emissions will be conducted by certified professionals.

Response to Comment 11: The Authority is responsible for management of RF EME as part of the FCC licensing process. Long term, the City of Long Beach manages the site. During our community outreach meeting held at Signal Hill on February 17, the City of Long Beach representative stated that they perform site RF EME testing every two years as part of overall site maintenance.

Comment 12: All RF studies should be coordinated with the operator of the adjacent antenna tower at 2411 Skyline Drive, which is immediately adjacent to the subject site.

Response to Comment 12: As noted in response to comment 8, the Authority will conduct all RF EME testing in accordance with FCC OET Bulletin 65.

Comment 13: Specifically, the RF reports should study exposure rates for the General Public if both sites were at full capacity with antennas, whips and or other emitting equipment. A discussion on compounded RF Emissions is not included in the DEIR.

Response to Comment 13: As noted in response to comment 8, the Authority will conduct all RF EME testing in accordance with FCC OET Bulletin 65.

Comment 14: LA-RICS should include details of the procedures, equipment used, regularity, and methods of communicating the results of emissions monitoring before and after installation of equipment at the requested community meeting, or shall coordinate with the City of Signal Hill to conduct a third community meeting with these details.

Response to Comment 14: The Authority will continue to work with the City and adjacent Homeowner's Association to disseminate factual information regarding site operations. We look forward to coordinating additional meeting(s) and additional outreach in the City of Signal Hill to accomplish this goal.

Comment 15: A map should be included within the DEIR showing improved coverage and identifying areas of concern where coverage would likely be lost during high emergency use.

Response to Comment 15: Coverage and capacity are not environmental issues that require a response pursuant to CEQA Guidelines Section 15088. Regardless, it is unlikely that coverage will suffer substantially during an emergency. Unlike long-term evolution (LTE) technology, LMR coverage propagation is relatively consistent by frequency, regardless of traffic.

Responses to Comment Letter LR-11

Comment 16: The DEIR should discuss how interference issues will be addressed. Particularly, interference with frequencies used by residents for cable, radio, phone and or internet services.

Response to Comment 16: Interference is not an environmental issue that requires a response pursuant to CEQA Guidelines Section 15088. Regardless, many of the spectrum bands listed will not be impacted by any of the frequencies being added. For other systems that exist on the tower, if there was evidence (as determined by FCC) that the Authority was causing interference, the Authority would be responsible for resolving the issue.

Comment 17: Prior to the issuance of building permits by the City of Long Beach, the City of Signal Hill requests a copy of the Federal Aviation Administration determination of no hazard to air navigation letter or flight operations for any extension of the tower and/or lighting rod (per HAZ Mitigation Measure 2).

Response to Comment 17: The Authority will continue to provide information to the City of Signal Hill.

Comment 18: Fuel tanks shall be installed in accordance with California Fire Code and applicable hazardous material storage ordinances.

Response to Comment 18: Management of fuels will be conducted in accordance with all applicable regulations. This topic is described in Draft EIR Section 3.7 and specific detail is provided for Site SGH beginning at page 4-1508.

Comment 19: Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks adjacent to residential dwellings and active oil wells shall be implemented.

Response to Comment 19: Management of fuels will be conducted in accordance with all applicable regulations. This topic is described in Draft EIR Section 3.7 and specific detail is provided for Site SGH beginning at page 4-1508.

Comment 20: If the tank is greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, a copy of the spill prevention, control and countermeasure plan shall be submitted to the City.

Response to Comment 20: Management of fuels will be conducted in accordance with all applicable regulations. This topic is described in Draft EIR Section 3.7 and specific detail is provided for Site SGH beginning at page 4-1508.

Comment 21: Contact information for the contractor and/or project manager should be provided to report any issues during construction.

Response to comment 21: Best management practices provided in Appendix C of the Draft EIR include the advance notification to surrounding land uses disclosing the construction schedule and construction activities. The notifications would include project contact information.

Responses to Comment Letter LR-11

Comment 22: Prior to the start of any evening or weekend work, both the City and community should be notified in writing of construction activities expected to occur (between 6 p.m. and 7 a.m. or weekends).

Response to Comment 22: Construction would be scheduled to occur within the specified hours when construction activities are allowed pursuant to the noise ordinances established by the City of Signal Hill; however, it may be necessary for construction activities to take place outside these specified hours due to an accelerated construction schedule or avoidance of peak traffic hours in urban locations requiring night or weekend work. In the event that is required, the Authority would work cooperatively with the City and make every effort to comply with the City's standards and regulations.

Comment 23: The DEIR does not describe what noise mitigation there will be for the diesel motor and any other air conditioning, electrical equipment etc. to reduce operational noise to below the 55dBA (ambient noise required by the Signal Hill Municipal Code).

Response to Comment 23: Per Chapter 9.16.060 of the Municipal Code, machinery and other equipment, including air conditioning units, generators, etc. operating for more than 5 minutes cannot exceed the ambient noise level at the property line. The daytime (7 a.m. to 10 p.m.) and nighttime (10 p.m. to 7 a.m.) ambient noise level for residential areas prescribed in Chapter 9.16.020 of the Signal Hill Municipal Code are 60 dBA and 50 dBA, respectively. Table 3.10-2 of the Draft EIR will be revised to include this regulation. Draft EIR Section 3.10.4 describes a 52 dBA noise exposure within 10-feet of an operating air conditioning unit. The backup generator, which would be tested one-hour per month and otherwise operate on an emergency basis only, would be enclosed in a solid housing that will provide a minimum 10 dBA noise attenuation and result in a 58 dBA exposure at a distance of 21-feet or approximately 56 dBA at the property line (25-feet); however, the closest adjacent receiver to the SGH property line is separated by a 5-foot privacy wall that would provide an additional 5 dBA of noise mitigation and a net 51 dBA at the property line. Therefore, the operation of these pieces of equipment at proposed site SGH would not create more than a 5dBA increase above the ambient level including during nighttime hours. Chapter 4 of the Draft EIR will be revised in to include this additional information.

Comment 24: The DEIR does not describe details for maintaining security at the SGH site.

Response to Comment 24: Site security is not an environmental issue that requires a response pursuant to CEQA Guidelines Section 15088. Nevertheless, the Authority would install the proposed LMR equipment inside a secure compound, maintained by the City of Long Beach. There is no evidence of a need for any additional levels of security beyond what exists today.

Comment 25: The DEIR does not describe annual RF emission reports that will be conducted to ensure that the tower is operating at a safe level as prescribed by the FCC. The City would like a copy of all annual RF emission reports.

Response to Comment 25: The Authority understands that the City of Long Beach conducts testing at site SGH every two years as part of a regular maintenance program. The City of Signal Hill would need to work with the City of Long Beach to obtain any reports other than those directly associated with the LMR licensing effort (i.e., desktop analysis and post-construction confirmatory sampling required by OET Bulletin 65), which the Authority will provide as requested.



Responses to Comment Letter LR-11

Comment 26: Upon receipt of the final LA-RICS tower design and prior to the issuance of any building permits, the City of Signal Hill requests that the LA-RICS Authority hold at least one additional community meeting to provide the local community (including the Promontory/Skyline Estates Homeowners Association) with information about the final design, share the results of any studies and answer any questions requested in this letter.

Response to Comment 26: The request for a community meeting is not an environmental issue that requires a response pursuant to CEQA Guidelines Section 15088. However, upon completion of design and prior to construction, the Authority will coordinate additional community meeting(s) and other outreach efforts with residents of the City of Signal Hill.

Comment 27: Other Comments: The following updates (shown with strikeouts for deletions and red text for additions) to the DEIR are requested for administrative purposes:

Project Description
 Jurisdiction
Page 1-11
Local Agencies
 • City of Long Beach

Page 2-18
 Table 2.1-1

Site ID	Site Name	Street	City	Zip Code	Jurisdiction
SGH	Signal Hill	2321 Stanley Ave.	Signal Hill	90755	Signal Hill Long Beach

Page 4-1487
 Jurisdiction: City of Long Beach
 Landowner(s): GTE California Inc and Long Beach City

Page 4-1505
GEO-2 Discussion:
 Construction plans would be reviewed by the City of Long Beach ~~Signal Hill~~ planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing storm drain inlets.

Page 4-1514
 Local Agency Jurisdiction: Long Beach ~~Signal Hill~~
 Zoning: Hilltop Area Specific Plan, Antenna and Microwave Consolidation/Park Site
 Note: The Hilltop Area Specific Plan includes view protection provisions, but the City of Signal Hill is not administering permits for the project.

3.12 Transportation/Traffic Page 3-516
 Circulation Element, Scenic Routes - designates Skyline Drive, immediately south of the project site as a scenic route.



Responses to Comment Letter LR-11

4.0 Chapter 4 Site Summary Forms

Page 4-1524

Nearest Solid Waste Disposal Facility: EDCO Disposal, 2755 California Ave, Signal Hill, CA 90755

Page 3-372

Table 3. 7-4 Proposed Project Sites

Correct Address Section: Signal Hills

Response to Comment 27: The requested changes will be made in the Final EIR. These revisions do not result in any change to the impact conclusions in the Draft EIR.



Comment Letter LR-12



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Jillian Wong, PhD
Program Supervisor
Planning, Rule Development and Area Sources
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765-4178

Dear Dr. Wong:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the South Coast Air Quality Management District on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment

Comment Letter LR-12



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS:
DraftEIR.Hotline@la-rics.org

February 19, 2016

Los Angeles Regional Interoperable Communications System
Joint Powers Authority
2525 Corporate Place, Suite 100
Monterey Park, CA 91754

Draft Environmental Impact Report (Draft EIR) for the Land Mobile Radio (LMR)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document both as a commenting agency and a responsible agency. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

1 The Lead Agency proposes the construction/installation of a wireless communications system. The LMR system would consist of antennas and support equipment at up to 90 sites. LMR antennas would be installed on the rooftops of existing buildings or on existing or new monopoles and lattice tower support structures. Diesel backup generators will be installed at all sites. Since the proposed project includes diesel-fueled generators which are rated greater than 50 brake horsepower (bhp), a permit would be required in accordance with SCAQMD rules including Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Initial Engines and Rule 1110.2 – Emissions From Gaseous- and Liquid-Fueled Engines. If there are permit questions concerning the generator, they can be directed to Engineering and Compliance Staff at (909) 396-2315.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. If you have any questions regarding this letter, please contact me at jcheng@aqmd.gov or call me at (909) 396-2448.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

LAC160113-01
Control Number



Responses to Comment Letter LR-12

The Authority appreciates the South Coast Air Quality Management District's comments on the Draft Environmental Impact Report (EIR) dated February 19, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to comments are provided below.

Comment 1: The Lead Agency proposes the construction/installation of a wireless communications system. The LMR system would consist of antennas and support equipment at up to 90 sites. LMR antennas would be installed on the rooftops of existing buildings or on existing or new monopoles and lattice tower support structures. Diesel backup generators will be installed at all sites. Since the proposed project includes diesel-fueled generators which are rated greater than 50 brake horsepower (bhp), a permit would be required in accordance with SCAQMD rules including Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Initial Engines and Rule 1110.2 – Emissions From Gaseous- and Liquid-Fueled Engines. If there are permit questions concerning the generator, they can be directed to Engineering and Compliance Staff at (909) 396-2315.

Response to Comment 1: A discussion of the South Coast Air Quality Management District Rule 1470 permitting requirements will be added to the Final EIR in Section 3.2.2.3 *Local Regulatory Setting*. The Draft EIR assumes that operation of backup generators will comply with District Rule 1110.2. Additional discussion of District Rule 1110.2 to evaluate the significance of project impacts under CEQA is not necessary.

Comment Letter NGO 1



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

February 20, 2016

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

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

Dear LA-RICS Board:

I am the First Vice President of Brentwood Hills Homeowners Association (Brentwood Hills), and am writing on behalf of Brentwood Hills in response to the Notice of Availability dated January 11, 2016. That Notice requests comments regarding the Draft Environmental Impact Report (DEIR) circulated under the California Environmental Quality Act (CEQA), and requests comments be submitted by February 25, 2016.

Brentwood Hills represents over 450 homes in the Santa Monica Mountains above Mandeville Canyon Road north of Sunset Blvd in the Brentwood region of Los Angeles. Brentwood Hills is located adjacent to Topanga State Park, the Westridge-Canyonback Wilderness Park, Temescal Park and the Santa Monica National Recreation Area. Brentwood Hills has been instrumental in protecting open space, public access and parklands in the Santa Monica Mountains.

1 | Brentwood Hills has serious concerns with the DEIR, which does not comply with either the letter or the spirit of CEQA in terms of its environmental analysis of the 180 foot-tall lattice LMR towers proposed for numerous locations in the Santa Monica Mountains, including locations within, adjacent to, or surrounded by the Santa Monica Mountains National Recreation Area and Topanga State Park. Many of these proposed locations are on significant ridgelines, within the Coastal Zone, and near scenic highways and corridors. Yet the DEIR dismisses the significant environmental impacts of these locations by noting that there is some development at the sites, or claiming that existing small towers located on those sites mean that there will be no significant impacts from the construction of the much larger 180 foot-tall lattice towers proposed for these sites, with their many antennas, dishes, lightning rods and flashing lights— not to mention the necessary power structures, associated equipment and grading activities.

2 | For example, the 180 foot-tall lattice tower proposed for the Green Mountain location (GRM) above the popular Temescal Ridge and Waterfall Trail in Temescal Park is much larger than the existing 50

Comment Letter NGO 1

LA-RICS
February 20, 2016

2 foot monopole antenna, both in terms of the height and breadth of the proposed tower, as well as the
 visual disruption to the many hiking trails in Topanga State Park and Temescal Park. And the
 environmental disruption associated with the necessary grading of the large pad required to support
 the associated power and communications equipment makes matters even worse. Similarly, the 180
 foot-tall lattice tower proposed for Topanga Peak (TOP) is materially larger and more disruptive
 3 than the two existing 26 foot-tall monopole antennas currently located at the site. And many of the
 other sites proposed within the Santa Monica Mountains Recreation Area do not have any antennas
 at all. Yet the DEIR notes in a cursory fashion that because there is some development or small
 towers at these sites, there will be no significant impacts from building the huge 180 foot-tall lattice
 towers at the sites. This does not comply with CEQA. The significant impacts of the huge towers
 proposed by LA-RICS within the Santa Monica Mountains are not properly analyzed in the DEIR,
 and the DEIR should be revised and recirculated.

4 In addition, the DEIR completely fails to analyze the required “no project” alternative for the
 specific tower locations in the Santa Monica Mountains. Instead, the DEIR defines the “no project
 alternative” to be the construction of no LA-RICS system at any location at all. Not surprisingly, the
 DEIR rejects that alternative in a cursory manner as not meeting project objectives. But CEQA
 requires much more than that, including a meaningful analysis of the no project alternative at each
 proposed tower location within the Santa Monica Mountains. For example, if the proposed 180 foot-
 tall lattice tower at Green Mountain is not constructed, how will the LA-RICS system be affected?
 Are there other locations that will provide similar coverage and benefits to the system, with fewer
 environmental impacts? The public and the decision-makers will never know because those issues
 are not analyzed in the DEIR.

5 Nor does the DEIR analyze any alternative tower heights or antenna configurations at those
 locations, as CEQA requires. At the public meeting held in Culver City, the LA-RICS
 representatives told me they believe that, as long as they analyze the largest tower configuration
 possible for the Santa Monica Mountain sites, CEQA will be satisfied, because LA-RICS decision-
 makers could later decide to construct a smaller tower, different antenna configurations or even
 delete the location when it comes time to actually build the project. But how will members of the
 public, affected agencies and even the LA-RICS decision-makers themselves know what the least
 impactful, most environmentally sensitive configuration is if the DEIR ignores any such analysis?
 CEQA requires a meaningful and thorough analysis of all alternatives, including alternative locations
 and tower configurations for each tower location proposed to be located within environmentally
 sensitive parklands, on significant ridgelines, within the Coastal Zone and near scenic highways and
 corridors.

6 The DEIR also fails to properly analyze the environmental impacts of the proposed towers on the
 visual, aesthetic, biological, parkland and ecological resources.

7 Brentwood Hills and many other community organizations feel strongly that the Santa Monica
 Mountains National Recreation Area, Topanga State Park, and Temescal Park are inappropriate
 locations for the huge 180 foot-tall LMR towers that LA-RICS is proposing for those sites.



Comment Letter NGO 1

LA-RICS
February 20, 2016

8 | Brentwood Hills urges that the DEIR be amended and recirculated to fully analyze both the “no project alternative” and alternative locations and tower configurations for each location within the Santa Monica Mountains where LA-RICS is proposing a 180 foot-tall lattice tower in the DEIR.

9 | Brentwood Hills agrees with the DEIR that the towers proposed for the H-69B and LACPCP08 sites pose significant and unavoidable environmental impacts, and we urge those sites to be deleted from consideration. Brentwood Hills also believes that the Green Mountain (GRM) and Topanga Peak (TOP) sites, if they were properly analyzed as required by CEQA, would also pose significant and unavoidable impacts. We urge those sites as well to be deleted from consideration.

10 | Brentwood Hills hereby incorporates all comments on the DEIR received by other community groups and public agencies, and requests that it be placed on the email and mailing notice lists for all public meetings, notices, letters and environmental reports concerning this project. Please email Brentwood Hills at leslie@caldwell-leslie.com.

We look forward to your thoughtful consideration of the community’s substantial concerns regarding these towers.

Sincerely,

A handwritten signature in blue ink that reads "Michael R. Leslie".

MICHAEL R. LESLIE,
First Vice President, Brentwood Hills Homeowners Association

Cc (via email):

Supervisor Sheila Kuehl, County of Los Angeles
State Senator Fran Pavley
State Assemblyman Richard Bloom
State Assemblyman Matt Dababneh
State Senator Ben Allen
Santa Monica Mountains Conservancy
National Park Service
Hillside Federation
Interested community groups and homeowners associations



Responses to Comment Letter NGO 1

The Authority appreciates the Brentwood Hills Homeowners Association’s comments on the Draft EIR dated February 20, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: Brentwood Hills has serious concerns with the DEIR, which does not comply with either the letter or the spirit of CEQA in terms of its environmental analysis of the 180 foot-tall lattice LMR towers proposed for numerous locations in the Santa Monica Mountains, including locations within, adjacent to, or surrounded by the Santa Monica Mountains National Recreation Area and Topanga State Park. Many of these proposed locations are on significant ridgelines, within the Coastal Zone, and near scenic highways and corridors. Yet the DEIR dismisses the significant environmental impacts of these locations by noting that there is some development at the sites, or claiming existing small towers located on those sites mean that there will be no significant impacts from the construction of the much larger 180 foot-tall lattice towers proposed for these sites, with their many antennas, dishes, lightning rods and flashing lights – not to mention the necessary power structures, associated equipment and grading activities.

Response to Comment 1: The EIR was prepared in accordance with CEQA and the CEQA Guidelines, PRC Section 21000 et seq. and 14 CCR Section 15000 et seq., respectively. A detailed description of activities associated with the construction and operation of the project is provided in Chapter 2 of the Draft EIR. Specifically, sections 2.1.2.1 (Project Site Components) and 2.1.2.2 (Project Site Types) discuss in detail what was considered in the impacts analysis. Section 2.1.2.1 specifically addresses “antennas”, “equipment shelters”, “emergency generators”, “grounding”, “cable raceway”, “utilities”, and “lighting”. Exhibits 2.1-2 through 2.1-6 also show the general appearance of the project types and size and composition of the enclosures. Impacts associated with construction of the proposed project types, including grading, are discussed in detail in Draft EIR Section 2.1.3 Construction. Impacts associated with operation and maintenance of the proposed project are discussed in detail in Draft EIR Section 2.1.4 Operations and Maintenance.

The Draft EIR identifies and fully analyzes impacts at each of the 54 sites evaluated for each of the 13 environmental resource areas as discussed in Chapter 3 and Chapter 4 of the Draft EIR. Pursuant to CEQA, a significance determination was made for each impact at each site as described in Chapter 4, aggregated in Chapter 3, and summarized in the executive summary (in particular Table ES-1 and Table ES-2) of the Draft EIR.

The Draft EIR includes information that 12 of the 54 sites analyzed are located within or adjacent to the Santa Monica Mountains National Recreation Area and/or Topanga State Park. These are sites CPK



(discussed at Draft EIR, page 4-296)¹, ENC1 (page 4-372), ENT (page 4-411), GRM (page 4-566), H-69B (page 4-643), LACF072 (page 4-799), LACFCP08 (page 4-837), LEPS (page 4-989), PWT (page 4-1371), SPN (page 4-1563), TOP (page 4-1722), ZHQ (page 4-2026). Of these 12 sites, two sites (LACFCP08 and PWT) are on land administered by the National Park Service, and one site (site GRM) is located on land administered by the California Department of Parks and Recreation in Topanga State Park.

The Draft EIR analysis also considers that:

- Six of these 12 sites (sites CPK, ENT, H-69B, LACFCP08, SPN, and TOP) were identified on significant ridgelines.
- Eight of these 12 sites (sites CPK, ENC1, GRM, LACF072, LACFCP08, PWT, SPN, TOP) are in the coastal zone.
- Nine of these 12 sites (sites CPK, ENC1, ENT, H-69B, LACF072, LACFCP08, PWT, SPN, and TOP) are adjacent to a scenic highway or regional trail.

Of the 12 sites identified above, existing communication support structures occur at sites CPK, GRM, SPN, TOP, and ZHQ. Because these sites already contain communication support structures which are a part of the existing viewshed, it was determined that the addition of a proposed new structure would result in an added visual intrusion to the area, but would not block or remove views, and therefore the visual impacts would not be significant.

Of the seven other sites in the Santa Monica Mountains National Recreation Area and/or Topanga State Park:

Site ENC1 is situated in an existing fire camp, amongst topography and tall vegetation that were determined to obscure the view of the proposed 180-foot tower and associated infrastructure, and aesthetic impacts were determined to be less than significant.

Site ENT includes existing large water towers. While the proposed 70-foot monopole and associated infrastructure would be visible from above, it would not result in a substantial adverse effect on any scenic vista, and aesthetic impacts were determined to be less than significant.

Site LACF072 is an existing fire station that is somewhat developed, containing tall vegetation. Views of the site from Decker Canyon Road are obscured by the cut banks along the roadway, which is lined by telephone/power poles. The site would not interfere with scenic vistas therefore impacts on scenic vistas were determined to be less than significant.

Site LACFCP08 is a developed fire station in an area that has been highly disturbed and is not easily visible from readily accessible viewpoints. The proposed new 70-foot monopole and associated infrastructure would not block or remove views, nor create a substantial impact on a scenic vista. Impacts to aesthetics were determined to be less than significant.

¹ Unless otherwise noted, all page numbers refer to pages in the Draft EIR that contain relevant site-specific analysis, which is incorporated by reference herein.



Site LEPS includes a water tank, that is not currently visible from Encinal Canyon Road. The proposed 70 foot monopole and associated infrastructure would be visible, but the greatly varying topography would help to obscure the monopole from some locations. The new facilities would be visible from certain view points in the area, particularly those north of the site toward the ocean. The relatively low height and narrow girth of the structure would make it difficult to see from more distant viewing locations, and the facilities would be below the viewing plane in many instances. Aesthetic impacts were determined to be less than significant.

Site PWT is adjacent to an existing water tank, and the proposed 28-foot monopole and associated infrastructure would not exceed the height of this existing infrastructure. Scenic views would not be substantially impacted, and aesthetic impacts would be less than significant.

Site H-69B is already highly disturbed, but the site is located on a scenic route on a significant ridgeline that contains no current infrastructure. Views would be substantially altered, since no infrastructure is present. As a result, the Draft EIR determined that aesthetic impacts at the site would be significant. The only potential mitigation measure for this impact would be to paint the structure. However, this mitigation is infeasible as FAA standards would dictate any painting or camouflaging activities associated with the proposed 180-foot tower for aviation safety purposes. Impacts were determined to be significant and unavoidable at this site.

The comment does not provide any evidence that would result in any revisions to the Draft EIR's conclusions.

Comment 2: For example, the 180 foot-tall lattice tower proposed for the Green Mountain location (GRM) above the popular Temescal Ridge and Waterfall Trail in Temescal Park is much larger than the existing 50 foot monopole antenna, both in terms of the height and breadth of the proposed tower, as well as the visual disruption to the many hiking trails in Topanga State Park and Temescal Park. And the environmental disruption associated with the necessary grading of the large pad required to support the associated power and communications equipment makes matters even worse.

Response to Comment 2: The site specific description and impact analysis for site GRM beginning at page 4-568 of the Draft EIR considered, among other factors, the bulk and scale of the existing built landscape of the site and the site's location within Topanga State Park along the heavily traveled Temescal Ridge Trail Road. At site GRM, the Draft EIR determined that hikers on the Temescal Ridge Trail would be the viewers most likely affected by construction of GRM. Due to the isolated nature of this site, it is not readily visible from vantage points other than the trail. Views of nature from the trail are currently intruded upon by existing human-made linear structures, such as power poles and powerlines, as well as intermittent views of the existing structures on the proposed site. As discussed on page 4-569 of the Draft EIR:

“Primary sensitive viewers include hikers on the ‘heavily traveled’ Temescal Ridge Trail, which ‘begins with a 1,000-foot ascent that gives way to panoramic ocean-and-city views, then descends into a sycamore-shaded canyon to a seasonal waterfall’ (trails.com 2014).”

Visual impacts were evaluated according to CEQA criteria as discussed in Chapters 3.0 and 4.0 of the Draft EIR. The aesthetic analysis considered several factors to determine visual sensitivity, visual changes, and visual impacts of each site, as summarized in the methodologies discussed in Section 3.1.1 of the Draft EIR. As noted in Section 3.1.4 of the Draft EIR, the analysis considered, among many other factors, the visual character of each site based the relationships between the existing visible natural and built landscape features of each site, the dominance, scale, diversity, and continuity of each site’s visual environment, as well as the height, bulk, and scale of existing site uses. Open spaces (such as parks and undeveloped land) and significant viewpoints and scenic viewers were also considered in the analysis. Section 3.1.4 of the Draft EIR notes that the sensitivity of existing visual resources is influenced by whether the visual resource is common or rare within the study area; whether it is considered to be of local, regional, national, or global importance, the quality of the resource; public awareness and tolerance of adverse visual change; and the ability of the resource to accommodate change.

Based on the methodology in Section 3.1.4, the impact analysis in the Draft EIR shows that construction would result in less than significant impacts on aesthetics at site GRM.

The existing visual character and quality of the site and its surroundings are impacted by the presence of an existing site and tower. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site.

The proposed new features would be uncharacteristic of the scenic vista if no structures were already present. However, the new facilities would be located within a site that includes existing towers that already create a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing towers, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

The commenter does not provide any new information or specific concerns related to the methodology, developed by the Authority’s aesthetics expert, utilized in the Draft EIR that would require the Authority to reconsider methodology or impact analysis at site GRM or any other site.

Other impacts resulting from grading, trenching, foundation excavation, construction, provision of power and communications lines, and other activities at site GRM were fully analyzed in the Draft EIR, as provided in the site specific analysis provided in Chapter 4 of the Draft EIR beginning on page 4-568.

Comment 3: Similarly, the 180 foot-tall lattice tower proposed for Topanga Peak (TOP) is materially larger and more disruptive than the two existing 26 foot-tall monopole antennas currently located at the site. And many of the other sites proposed within the Santa Monica Mountains Recreation Area do not have any antennas at all. Yet the DEIR notes in a cursory fashion that because these is some development or small towers, there will be no significant impacts from building the huge 180 foot-tall lattice towers at the sites. This does not comply with CEQA. The significant impacts of the huge towers proposed by LA-RICS within the Santa Monica Mountains are not properly analyzed in the DEIR, and the DEIR should be revised and recirculated.

Response to Comment 3: The visual impact analysis for site TOP considered the same factors as those considered for site GRM and all the other proposed sites, summarized above. Chapter 4.0 of the Draft EIR notes that site TOP is located on a significant ridgeline and includes existing infrastructure such as a microwave dish and whip antennas mounted to monopoles, as well as a water tank and small one-story building. A large radio relay tower is immediately adjacent to the site to the east. The existing radio tower is tall and very broad, and is an extremely prominent feature on the ridgeline (see photo below). The analysis notes that both the monopoles and radio tower are clearly visible from segments of east- and west-bound traffic on Saddle Peak Road. The Backbone Trail passes between the site and Saddle Peak Road, and a trailhead and pullout exist on the road just east of the site. The view is dominated by the ridgeline, the roadway corridor, and the radio tower.





Due to the area’s extensively rolling topography, views of the existing site are limited and intermittent. Similar to site GRM, Chapter 4.0 notes that the proposed new features would be uncharacteristic of the scenic vista if no structures were already present. However, the new facilities would be located within a site that includes a large, bulky radio tower and two shorter, slim monopoles that already create a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing towers, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that only a small area of the scenic vista is altered. The existing visual character and quality of the site and its surroundings are impacted by the presence of the existing towers. Although the proposed lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, this new infrastructure would be compatible with the existing site. There would be no substantial adverse change to the visual character or quality of the significant ridgeline or the Backbone Trail. In short, the proposed project would result in visual changes; however, the visual changes would result in a less than significant visual impact.

Regarding this comment, no new information or specific concerns were raised by the reviewer related to the methodology or impact analysis used for site TOP that would cause the Authority to reconsider the impact analysis presented in the Draft EIR.

Comment 4: In addition, the DEIR completely fails to analyze the required “no project” alternative for the specific tower locations in the Santa Monica Mountains. Instead, the DEIR defines the “no project alternative” to be the construction of no LA-RICS system at any location at all. Not surprisingly, the DEIR rejects that alternative in a cursory manner as not meeting project objectives. But CEQA requires much more than that, including a meaningful analysis of the no project alternative at each proposed tower location within the Santa Monica Mountains. For example, if the proposed 180 foot-tall lattice tower at Green Mountain is not constructed, how will the LA-RICS system be affected? Are there other locations that will provide similar coverage and benefits to the system, with fewer environmental impacts? The public and the decision-makers will never know because those issues are not analyzed in the DEIR.

Response to Comment 4: The Draft EIR defines the No Project Alternative as a scenario in which none of 54 sites considered within the Draft EIR would be constructed in compliance with CEQA Guidelines section 15126.6(e)(3)(B), which states that when the proposed project is a development project on identifiable property, the “no project” alternative is the scenario under which the project does not proceed.

Not constructing one or more of the individual towers proposed would not represent the “no project” alternative as defined in CEQA, and would result in a failure to meet the project objectives set forth in Draft EIR section 2.2 in the geographic location served by that site. Specifically, within that geographic area there would be:

- no day-to-day communications made available for first and second responders



- no interoperability among member agencies and mutual aid providers
- no support of communications with federal state and local agencies in emergencies
- no improvement of emergency communications
- no additional capacity created or replacement of aging infrastructure that meets current public safety requirements
- no ability to increase separation of antennas on support structures to reduce interference
- no provision of increased frequency flexibility to increase system coverage or capacity
- no ability to transition from existing T-Band (where it exists) to 700 MHz systems.

The sites proposed in the Santa Monica Mountains National Recreation Area and Topanga State Park provide coverage to serve population centers, transportation corridors, and areas of highest wildland fire, among other concerns. Physical, land use, and other constraints to development within these areas of concern within the Santa Monica Mountains National Recreation Area and Topanga State Park substantially limit suitable sites that serve these areas, hence eliminating the availability of alternatives in many locales. The ultimate selection of which sites will be constructed will be determined based on consideration of the public comment on the Draft EIR, as well as ultimate site feasibility during final system design. Ultimately the system design will seek to maximize Project Objectives discussed in Draft EIR Section 2.2.

Comment 5: Nor does the DEIR analyze any alternative tower heights or antenna configurations at those locations, as CEQA requires. At the public meeting held in Culver City, the LA-RICS representative told me they believe that, as long as they analyze the largest tower configuration possible for the Santa Monica Mountain sites, CEQA will be satisfied, because LA-RICS decision-makers could later decide to construct a smaller tower, different antenna configurations or even delete the location when it comes time to actually build the project. But how will members of the public, affected agencies and even the LA-RICS decision-makers themselves know what the least impactful, most environmentally sensitive configuration is if the DEIR ignores any such analysis? CEQA requires meaningful and thorough analysis of all alternatives, including alternative locations and tower configurations for each tower location proposed to be located within environmentally sensitive parklands, on significant ridgelines, within the Coastal Zone and near scenic highways and corridors.

Response to Comment 5: Final design of the system will occur if the project is approved. At that time, tower heights would be optimized based on the final system design. Some of these site would be constructed nearly exactly as they are described in the Draft EIR. Other sites may be designed to a shorter height if additional site information or system requirements found during later design stages made this feasible. Other reasons for a change in height could include (but are not limited to) items such as subsurface constraints for foundation depths, compliance with FAA requirements, or coastal consistency issues. At this time, it would be speculative to identify which sites might ultimately accommodate a reduced tower height.

The analysis conducted in Chapter 2 of the Draft EIR; Sections 2.1.2.1 Project Site Components and 2.1.2.2 Project Site Types provides the best design information currently available for the project.



Exhibits 2.1-2 through 2.1-6 also show the general appearance of the project types and size and composition of the enclosures. Impacts associated with construction of the proposed project types, including grading, are discussed in detail in Draft EIR Section 2.1.3 Construction. Impacts associated with operation and maintenance of the proposed project is discussed in detail in Draft EIR Section 2.1.4 Operations and Maintenance. Associated impacts are analyzed in Chapters 3 and Chapter 4 of the Draft EIR.

Comment 6: The DEIR also fails to properly analyze the environmental impacts of the proposed towers on the visual, aesthetics, biological, parkland, and ecological resources.

Response to Comment 6: The Draft EIR fully analyzed environmental impacts of the proposed towers on visual, aesthetics, biological, parkland and ecological resources. Site specific analysis for each of the 54 sites in the Draft EIR is provided in Chapter 4 and is summarized, as applicable in Chapter 3; Specifically, Section 3.1 (“visual” and “aesthetics”), Section 3.3 (“biological” and “ecological resources”) and Sections 3.9 and 3.11 (“parkland”). The Draft EIR was prepared in accordance with CEQA and the CEQA Guidelines, PRC Section 21000 et seq. and 14 CCR Section 15000 et seq., respectively.

Comment 7: Brentwood Hills and many other community organizations feel strongly that the Santa Monica Mountains National Recreation Area, Topanga State Park, and Temescal Park are inappropriate locations for the huge 180 foot-tall LMR towers that LA-RICS is proposing for those sites.

Response to Comment 7: The project site locations have been selected to maximize coverage to enhance safety and emergency response for 10 million Los Angeles County residents and the over 40 million Los Angeles County tourists. Your opposition to the project locations within the Santa Monica Mountains National Recreation Area, Topanga State Park, and Temescal Park is noted, is included in the record of proceedings, and will be considered by the Authority’s decision makers in connection with their consideration of the proposed project.

Comment 8: Brentwood Hills urges that the DEIR be amended and recirculated to fully analyze both the “no project alternative” and alternative locations and tower configurations for each location within the Santa Monica Mountains where LA-RICS is proposing a 180 foot-tall lattice tower in the DEIR.

Response to Comment 8: Please see response to Comment 4 and 5 above for a discussion of how the EIR’s analysis of alternatives complies with CEQA. The project locations within the Santa Monica Mountains, regardless of the project site type, are critical to the design of the system to provide county-wide coverage. These sites provide coverage to serve population centers, transportation corridors, and areas of highest wildland fire, among other concerns. Physical, land use, and other constraints to development within these areas of concern substantially limit suitable sites that serve these areas, hence eliminating the availability of alternatives in many locales. The commenter does not specifically identify alternative locations for consideration within the Santa Monica Mountains.



Nothing in the comments or the Authority’s responses to these comments is “significant new information” as that term is defined in CEQA guidelines section 15088.5, and recirculation of the Draft EIR is not required.

Comment 9: Brentwood Hills agrees with the DEIR that the towers proposed for the H-69B and LACPCP08 sites pose significant and unavoidable environmental impacts, and we urge those sites to be deleted from consideration. Brentwood Hills also believes that the Green Mountain (GRM) and Topanga Peak (TOP) sites, if they were properly analyzed as required by CEQA, would also pose significant and unavoidable impacts. We urge those sites as well to be deleted from consideration.

Response to Comment 9: As discussed in response to the comments above, and as stated in the Draft EIR, no significant and unavoidable impacts were found for sites GRM or TOP. (See DEIR pp. 4-566 through 4-603 (GRM) and pp. 4-1722 through 4-1761 (TOP).) The comment letter does not provide any evidence that would require a revision to these conclusions in the EIR. The request that these sites be deleted from consideration will be considered by the Authority’s decision makers in connection with the proposed project.

Comment 10: Brentwood Hills hereby incorporates all comments on the DEIR received by other community groups and public agencies, and requests that it be placed on the email and mailing notice lists for all public meetings, notices, letters and environmental reports concerning this project. Please email Brentwood Hills at leslie@caldwell-leslie.com.

Response to Comment 10: The Authority acknowledges the incorporation of other comments into this comment letter. In response, the Authority incorporates its responses to those comments by reference.

Comment Letter NGO 2

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 Save Coldwater Canyon!
 Save Sunset Blvd.
 Shadow Hills Property Owners
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 Silver Lake Heritage Trust
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 Torreyson Flynn Assn.
 Upper Mandeville Canyon
 Upper Nichols Canyon NA
 Whittley Heights Civic Assn.

CHAIRS EMERITI
 Shirley Cohen
 Jerome C. Daniel
 Patricia Bell Hearst
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 Gordon Murley
 Steve Twining
 CHAIRS IN MEMORIAM
 Brian Moore
 Polly Ward

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.

Comment Letter NGO 2

5 | • 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
Marian Dodge

Responses to Comment Letter NGO 2

The Authority appreciates the Federation of Hillside and Canyons Association’s comments on the Draft EIR dated February 22, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: 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.

Response to Comment 1: The Authority acknowledges the incorporation of the Brentwood Hills Homeowners Association into this comment letter. In response, the Authority incorporates its responses to those comments by reference.

Comment 2: 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.

Response to Comment 2: The Draft EIR identifies and fully analyzes impacts at each of the 54 sites evaluated for each of the 13 environmental resource areas, as discussed in Chapter 3 and Chapter 4 of the Draft EIR. Pursuant to CEQA, a significance determination was made for each impact at each site as described in Chapter 4, aggregated in Chapter 3, and summarized in the executive summary (in particular Table ES-1 and Table ES-2) of the Draft EIR.



The Draft EIR includes information that 12 of the 54 sites analyzed are located within or adjacent to the Santa Monica Mountains National Recreation Area and/or Topanga State Park. These are sites CPK (discussed at Draft EIR, page 4-296)², ENC1 (page 4-372), ENT (page 4-411), GRM (page 4-566), H-69B (page 4-643), LACF072 (page 4-799), LACFCP08 (page 4-837), LEPS (page 4-989), PWT (page 4-1371), SPN (page 4-1563), TOP (page 4-1722), ZHQ (page 4-2026). Of these 12 sites, two sites (LACFCP08 and PWT) are on land administered by the National Park Service, and one site (site GRM) is located on land administered by the California Department of Parks and Recreation in Topanga State Park.

The Draft EIR analysis also considers that:

- Six of these 12 sites (sites CPK, ENT, H-69B, LACFCP08, SPN, and TOP) were identified on significant ridgelines.
- Eight of these 12 sites (sites CPK, ENC1, GRM, LACF072, LACFCP08, PWT, SPN, TOP) are in the coastal zone.
- Nine of these 12 sites (sites CPK, ENC1, ENT, H-69B, LACF072, LACFCP08, PWT, SPN, and TOP) are adjacent to a scenic highway or regional trail.

Of the 12 sites identified above, existing communication support structures occur at sites CPK, GRM, SPN, TOP, and ZHQ. Because these sites already contain communication support structures which are a part of the existing viewshed, it was determined that the addition of a proposed new structure would result in an added visual intrusion to the area, but would not block or remove views, and therefore the visual impacts would not be significant.

Of the seven other sites in the Santa Monica Mountains National Recreation Area and/or Topanga State Park:

Site ENC1 is situated in an existing fire camp, amongst topography and tall vegetation that obscure the view of the proposed 180-foot tower and associated infrastructure, and aesthetic impacts were determined to be less than significant.

Site ENT includes existing large water towers. While the proposed 70-foot monopole and associated infrastructure would be visible from above, it would not result in a substantial adverse effect on any scenic vista, and aesthetic impacts were determined to be less than significant.

Site LACF072 is an existing fire station that is somewhat developed, containing tall vegetation. Views of the site from Decker Canyon Road are obscured by the cut banks along the roadway, which is lined by telephone/power poles. The site would not interfere with scenic vistas therefore impacts on scenic vistas were determined to be less than significant.

Site LACFCP08 is a developed fire station in an area that has been highly disturbed and is not easily visible from readily accessible viewpoints. The proposed new 70-foot monopole and associated

² Unless otherwise noted, all page numbers refer to pages in the Draft EIR that contain relevant site-specific analysis, which is incorporated by reference herein.

infrastructure would not block or remove views, nor create a substantial impact on a scenic vista. Impacts to aesthetics were determined to be less than significant.

Site LEPS includes a water tank, that is not currently visible from Encinal Canyon Road. The proposed 70 foot monopole and associated infrastructure would be visible, but the greatly varying topography would help to obscure the monopole from some locations. The new facilities would be visible from certain view points in the area, particularly those north of the site toward the ocean. The relatively low height and narrow girth of the structure would make it difficult to see from more distant viewing locations, and the facilities would be below the viewing plane in many instances. Aesthetic impacts were determined to be less than significant.

Site PWT is adjacent to an existing water tank, and the proposed 28-foot monopole and associated infrastructure would not exceed the height of this existing infrastructure. Scenic views would not be substantially impacted, and aesthetic impacts would be less than significant.

Site H-69B is already highly disturbed, but the site is located on a scenic route on a significant ridgeline that contains no current infrastructure. Views would be substantially altered, since no infrastructure is present. As a result, the Draft EIR determined that aesthetic impacts at the site would be significant. The only potential mitigation measure for this impact would be to paint the structure. However, this mitigation is infeasible as FAA standards would dictate any painting or camouflaging activities associated with the proposed 180-foot tower for aviation safety purposes. Impacts were determined to be significant and unavoidable at this site.

The comment does not provide any evidence that would result in any revisions to the Draft EIR's conclusions.

Comment 3: The DEIR fails to analyze the “no project” alternative on a site-by-site basis.

Response to Comment 3: The Draft EIR defines the No Project Alternative as a scenario in which none of 54 sites considered within the Draft EIR would be constructed in compliance with CEQA Guidelines section 15126.6(e)(3)(B), which states that when the proposed project is a development project on identifiable property, the “no project” alternative is the scenario under which the project does not proceed.

Not constructing one or more of the individual towers proposed would not represent the “no project” alternative as defined in CEQA, and would result in a failure to meet the project objectives set forth in Draft EIR section 2.2 in the geographic location served by that site. Specifically, within that geographic area there would be:

- no day-to-day communications made available for first and second responders
- no interoperability among member agencies and mutual aid providers
- no support of communications with federal state and local agencies in emergencies
- no improvement of emergency communications

- no additional capacity created or replacement of aging infrastructure that meets current public safety requirements
- no ability to increase separation of antennas on support structures to reduce interference
- no provision of increased frequency flexibility to increase system coverage or capacity
- no ability to transition from existing T-Band (where it exists) to 700 MHz systems.

The sites proposed in the Santa Monica Mountains National Recreation Area and Topanga State Park provide coverage to serve population centers, transportation corridors, and areas of highest wildland fire, among other concerns. Physical, land use, and other constraints to development within these areas of concern within the Santa Monica Mountains National Recreation Area and Topanga State Park substantially limit suitable sites that serve these areas, hence eliminating the availability of alternatives in many locales. The ultimate selection of which sites will be constructed will be determined based on consideration of the public comment on the Draft EIR, as well as ultimate site feasibility during final system design. Ultimately the system design will seek to maximize Project Objectives discussed in Draft EIR Section 2.2.

Comment 4: The DEIR fails to analyze alternative tower heights, technologies, and configurations.

Response to Comment 4: Various other types of technologies and configurations were considered and subsequently eliminated from further consideration because they would not meet project objectives and/or they would not be feasible for additional reasons (see DEIR Section 2.6).

A “Collocation” alternative was considered that would have limited LMR antennas to existing structures. Limiting the LMR locations to only those where collocation is possible would not provide the desired coverage, would not meet the Project objectives and was not considered further.

An alternative identified as “Use Cell on Wheels” (COW) was considered and would have included portable towers or monopoles with self-contained equipment and generators. Height limitations for portable towers and equipment weight limitation for portable monopoles limited applicability to only a few sites and would not provide desired coverage. Use of COWs would not meet the Project objectives and was not considered further.

An alternative identified as “Use of Satellites” was considered, and it was determined that LMR communication could be conducted by using a satellite system. However use of satellites for LMR communication would result in a lag time between sender and receiver that does not allow for quick communication required during emergencies. Use of satellites would not meet the Project objectives and was not considered further.

Additionally, the Authority reviewed various telecommunications options and worked with industry experts to modernize their systems, and ease transition from the existing network to a hybrid of digital and analog networks to provide a mobile data system. In November 2011, requests for proposals were developed to support the hybrid system. In January 2012, proposals were received and a vendor was chosen. No alternative system to the hybrid system was identified.

Final design of the system will occur if the project is approved. At that time, tower heights would be optimized based on the final system design. Some of these sites would be constructed nearly exactly as they are described in the Draft EIR. Other sites may be designed to a shorter height if additional site information or system requirements found during later design stages made this feasible. Other reasons for a change in height could include (but are not limited to) items such as subsurface constraints for foundation depths, compliance with FAA requirements, or coastal consistency issues. At this time, it would be speculative to identify which sites might ultimately accommodate a reduced tower height.

The analysis conducted in Chapter 2 of the Draft EIR; Sections 2.1.2.1 Project Site Components and 2.1.2.2 Project Site Types provides the best design information currently available for the project. Exhibits 2.1-2 through 2.1-6 also show the general appearance of the project types and size and composition of the enclosures. Impacts associated with construction of the proposed project types, including grading, are discussed in detail in Draft EIR Section 2.1.3 Construction. Impacts associated with operation and maintenance of the proposed project is discussed in detail in Draft EIR Section 2.1.4 Operations and Maintenance. Associated impacts are analyzed in Chapters 3 and Chapter 4 of the Draft EIR

Comment 5: 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.

Response to Comment 5: Wilderness is defined in the Wilderness Act of 1964 as “an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain.” (See Draft EIR, p. 3-494.) There are no wilderness areas in the Santa Monica Mountains National Recreation Area or Topanga State Park. The closest wilderness areas to the project are the San Gabriel Wilderness in the San Gabriel Mountains National Monument, which is approximately 1.5 miles north of the Pine Mountain site (PMT), and the Cucamonga Wilderness in the Angeles National Forest, which is approximately 3 miles northeast of the Sunset Ridge sites (SUN and SUN2). (See Draft EIR, p. 3-53.) The Draft EIR analyzed the potential impacts of the proposed project on aesthetics, biological resources, and recreation and determined that impacts would be less than significant. The Draft EIR also fully analyzed environmental impacts of the proposed towers on visual, aesthetics, biological, parkland and ecological resources. Site specific analysis for each of the 54 sites in the Draft EIR is provided in Chapter 4 and is summarized, as applicable in Chapter 3; Specifically, Section 3.1 (“visual” and “aesthetics”), Section 3.3 (“biological” and “ecological resources”) and Sections 3.9 and 3.11 (“parkland”). The Draft EIR was prepared in accordance with CEQA and the CEQA Guidelines, PRC Section 21000 et seq. and 14 CCR Section 15000 et seq., respectively.

Comment 6: 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.



Response to Comment 6: As discussed in response to your comments above, and as stated in the Draft EIR, no significant and unavoidable impacts were found for sites GRM or TOP. (See DEIR pp. 4-566 through 4-603 (GRM) and pp. 4-1722 through 4-1761 (TOP).) The project site locations have been selected to maximize coverage to enhance safety and emergency response for 10 million Los Angeles County residents and the over 40 million Los Angeles County tourists. Your opposition to the project locations within the Santa Monica Mountains National Recreation Area, Topanga State Park, and Temescal Park are noted, is included in the record of proceedings, and will be considered by the Authority’s decision makers in connection with their consideration of the proposed project.



Comment Letter NGO 3



CATALINA ISLAND CONSERVANCY

A responsible steward of its lands through a balance of conservation, education and recreation.

February 25, 2016

Los Angeles Regional Interoperable Communications System
Joint Powers Authority
2525 Corporate Place
Suite 100
Monterey Park, California 91754

Sent by: Certified Mail and By E-Mail to DraftEIR.Hotline@la-rics.org

RE: Comments on Draft EIR of the Catalina Island Conservancy

The Santa Catalina Island Conservancy (Conservancy) is the Santa Catalina Island landowner, where the new and additional towers for the Los Angeles Interoperability Communications System (LA-RICS) proposal of Land Mobile Radio (LMR) systems is to be installed. The Conservancy acts as a responsible steward of its lands. We give tremendous efforts toward conservation and Catalina wildland aesthetics. The Conservancy supports the LA-RICS project goal proposal of Land Mobile Radio (LMR) Systems to be installed on Blackjack Peak (BJM), Dakin Peak (DPK), Tower Peak (TWR). The Conservancy hereby submits the following comments on the Draft Environmental Impact Report (Draft EIR) dated January 2016.

The Santa Catalina Island Conservancy is a 501(c)(3) non-profit corporation and is the fee simple owner of its lands and is responsible for all aspects of conservation and land management in accordance with its Articles of Incorporation and strategic and other plans.

A summary of the main issues regarding the project are provided in the body of this letter. Specific comments are referenced to section, table, page number and/or figure in Attachment A to this letter.

The Conservancy's main issues with the Draft EIR fall into four main categories: Aesthetic/Viewshed Analysis, Alternatives Analysis, Environmental Impacts/Mitigation and Local Zoning Requirements.

Aesthetic/Viewshed Analysis

Based on our review of the Draft EIR, the document plays short shift with this issue, basically concluding that since there is already a 100 foot tower at all three proposed sites (BJM, DPK, TWR), there are no aesthetic or viewshed issues with building a second 180-200 feet tower (plus 15 foot lighting rod) adjacent to the existing tower. It is the Conservancy's position that "co-location" does not resolve this issue for Catalina Island. All three existing towers can be viewed from multiple, long distance vantages as you approach Catalina Island from the sea. They are also distinct features from multiple vantages throughout Catalina Island's interior. Blackjack Peak is the third highest mountain on Catalina Island and it and its tower can be seen from locations from the far East End to the far West End of the Island. The new towers will be

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P. O. Box 2739, Avalon, CA 90704 – 310.510.2595 – www.catalinaconservancy.org
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Comment Letter NGO-3



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twice as tall, wider at the base, and also permanently lit at night. They will permanently and irrevocably alter the skyline of the Island. The Conservancy believes the Draft EIR must take an island-specific, detailed and extended look at this issue and how it should be resolved for all three proposed Catalina Island sites.

1 | 2

Alternatives Analysis

This issue is closely related to the aesthetic/viewshed issue. The Conservancy believes the alternatives analysis in the Draft EIR is incomplete in that it does not specifically address at least two obvious alternatives than the one selected. First, the Draft EIR does not address whether the existing 100 foot towers could be replaced by a single larger tower that could house all of the antennas and dishes of the existing tower plus the antennas and dishes for the LA-RICS LMR project. This alternative, if acceptable, would help to resolve the aesthetic/viewshed issue discussed above in that while the replacement tower would be much taller, there would still only be one tower at each of the three sites. Second, the Draft EIR does not discuss as an alternative whether an additional tower is actually needed at all three locations to accomplish the LA-RICS LMR project goals. Third, the Draft EIR does not discuss whether a second much larger tower at one location plus larger replacement towers at the other two sites is an option (or other variants on this theme).

3 | 4 | 5

The Conservancy believes the Draft EIR must take an island-specific, detailed and extended look at this issue and how it should be resolved for all three proposed Catalina Island sites. The Conservancy believes the project proponent should provide to the Conservancy and the Island Community 3D animations from multiple vantage points and appropriate GIS maps of the various alternatives for all three sites discussed here and in the Draft EIR.

6

Environmental/Mitigation Issues

As outlined in detail in Attachment A, the project as proposed entails a number of less-than-trivial environmental and mitigation issues. The Conservancy has proposed Catalina-specific language and requirements that it would like to see incorporated into the various tables and text of the Draft EIR. Three main issues emerge from the Conservancy's review of the environmental issues associated with the project:

7

1) While the Blackjack site appears to have an already developed pad that would allow the construction of a new or replacement tower without further habitat disturbance, the Dakin Peak and Tower Peak sites do not appear large enough to accomplish this with permanent alteration of natural habitat. In particular, level ground at the Tower Peak site is fully occupied by the existing tower, shed, and generator and to co-locate a second tower or even replace the existing tower with a new larger tower would appear to require cutting down the existing peak 10-20 feet or more or significant fill and grading to create a large enough level space. Given the stringent regulatory requirements specific to Catalina Island in the Los Angeles County Zoning Code (see discussion below), the Conservancy believes the Draft EIR must take an island-specific, detailed and extended look at each of the three proposed sites, with actual, not "typical" site plans.

8

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2) The Draft EIR does only a cursory analysis of how migratory or resident birds or resident bats will be affected by up to three 200 foot lattice tower mounted with 80 whip antennas and multiple dishes. The island's position as a mountain in the ocean presents different risk factors than a typical mainland location to migratory species in particular who are flying across and over the Island. The Conservancy believes the Draft EIR must take an island-specific, detailed and extended look at each of the three proposed sites, with regards to the presumed increase in bird and/or bat mortality that would be expected

9

3) The Draft EIR should include on-the-ground mitigation proposals and not just the "process" (plans, inspections, construction practices, etc.) proposed in the Draft EIR. The Conservancy will expect that unavoidable, and permanent habitat or species impacts will be mitigated by on-the-ground improvements and long-term monitoring (e.g. of bird or bat mortality) funded by annual return from a monitoring fund.

10

Local Zoning Requirements

Finally, the Conservancy was surprised to not find any discussion of the stringent zoning requirements applicable to the Island found in Title 22 of the Los Angeles County Code. The 1983 Local Coastal Plan, which is referenced in the Draft EIR, was codified into ordinance in Title 22, Sections 22.46.050 through 22.46.750, of the Los Angeles County Code and is the controlling rule for approving development on Santa Catalina Island. Principal and Accessory Permitted Uses for Open Space/Conservation District zones are listed in Section 22.46.120 through 22.46.160. Development standards for archeological/historical, flora and fauna, soils and geology, slopes, fire, noise, view protection and signs are found in Sections 22.46.450 through 22.46.530. Development of communication equipment buildings and antennas require a Coastal Development Permit and Conditional Use Permit (Section 22.46.150) and must comply with view protection requirements in Section 22.46.520. The current EIR is silent as to whether the proposed new towers at BJM, DPK and TWR will comply with the standards in Title 22 applicable to Catalina Island. Again, the Conservancy believes the Draft EIR must take an island-specific, detailed and extended look at each of the three proposed sites in relation to now codified LCP in Title 22. Finally in addition to the Title 22 requirements, two of the three tower locations (BJM, DPK) are located in Significant Ecological Areas (SEAs). Los Angeles County Code and Policy includes an additional level of review, over and above the CDP/CUP permit process, by the SEA Technical Advisory Committee (SEATAC) for projects located in SEAs or in LACA Lots where an SEA is located. This process is also not addressed in the relevant code summary sections of the Draft EIR.

11

12

In closing, the Conservancy wishes to emphasize that it is fully in support of the broad goals and improvements in safety, emergency response and law enforcement which will come from the implementation of the LA-RICS LMR project. However, given its own mandates in its corporate charter for the long-term care and protection of its lands on Catalina Island, a much more detailed and nuanced, Island-specific analysis is required for the tower locations proposed on the Island.

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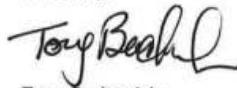


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The Conservancy is looking forward to engaging further with LA-RICS LMR project and working to a resolution of the issues we have raised.

Sincerely,



Tony Budrovich
Chief Operating Officer



John J. Mack
Chief Conservation and Education Officer

cc Ann Muscat, President and CEO
Conservancy Board of Directors

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ATTACHMENT A

Table ES-2. AES-1 through 4. As discussed in the general comments section, the Conservancy does not concur with the analysis or results of the Aesthetic Review.	13
Table ES-2. BIO-MM-1. The EIR should state the Conservancy will need to review and concur in the Mitigation Monitoring and Reporting Plan (MMRP) and Worker Environmental Awareness Program (WEAP) plans prior to initiating any construction activities on its lands.	14
Table ES-2. BIO-MM-1. The EIR should state that for sites DPK, BJM, TWR the biological monitor shall visit the sites at least once per week during weeks when construction workers are present on site, and at least monthly during periods when active construction is not occurring but the project is not yet completed and the biological monitor shall contact the Conservancy’s Director of Conservation prior to each visit in order to coordinate a joint site inspection with Conservancy staff.	15
Table ES-2. BIO-MM-4. Site Sanitation. The EIR should state that all solid waste will be placed in wildlife proof containers with tight fitting secure lids. Containers with any liquids of any sort, e.g. drums, roll-off boxes, dumpsters, etc., shall be tightly sealed to prevent foxes or other wildlife from drowning in the containers.	16
Table ES-2. BIO-MM-5. The EIR should state that only "hazardous materials" allowed on the site are fuel, equipment lubricants or other materials, such that if disposed would not be considered "hazardous waste" under the Resource Conservation and Recovery Act (RCRA) or equivalent state law hazardous waste definitions.	17
Table ES-2. BIO-MM-8. The EIR should specifically reference the Catalina Island Fox for sites BJM, DPK and TWR and state that all holes, trenches or other excavations must be completely and securely covered at the end of each work day and/or provided with fox escape ramps.	18
Table ES-2. BIO-MM-9(b). The EIR should state that surveys for special status plant species at sites BJM, DPK, and TWR will be performed during the appropriate time of year for the particular species, e.g. spring surveys for special status annual plants, to be observed and identified.	19
Table ES-2. BIO-MM-9(f). The EIR should state that for sites BJM, DPK and TWR the limits of disturbance shall be clearly delimited with properly installed construction fencing or closely-spaced 4 foot grading stakes with at least two signs per side of the construction site that state, "No Equipment or Soil Disturbance Beyond this Point."	20
Table ES-2. BIO-MM-11. The EIR should state that for sites BJM, DPK and TWR the Project contactor(s) shall obtain all necessary Conservancy vehicle access permits at least 30 days prior	21

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to bringing vehicles or other wheeled equipment onto Conservancy lands. Project contractor(s) shall also provide proof of insurance (\$1,000,000) for any damage to Conservancy infrastructure and provide a written plan for how Conservancy primary and secondary roads will be used, contingencies for non-use or upgrade during rainy periods, frequency of access, minimizing ingress and egress, etc. | 21

Table ES-2. BIO-MM-23(a). The EIR should state that for sites BJM, DPK and TWR only seeds or plants obtained from the Conservancy's native plant nursery will be used for revegetating disturbed ground at the project sites. | 22

Table ES-2. BIO-MM-23(b). The EIR should state that for sites BJM, DPK and TWR, vehicles or other equipment shall enter Conservancy unless inspected by the Conservancy's Invasive Plant Program Manager. | 23

Table ES-2. CUL-1. The EIR should add BJM, DPK and TWR to the "sites" column for CUL-1 rows. All three sites have known cultural locations on (BJM) or within 500 foot buffer. The EIR should state that for sites BJM, DPK and TWR that an archeology monitor is present at all times excavation is occurring at each site. | 24

Table ES-2. HAZ-4-MM-1. The EIR should state that for sites BJM, DPK and TWR the construction contractor shall coordinate the completion of the Phase 1 audit with the Conservancy's Chief of Conservation and provide the Conservancy an opportunity to review the draft audit prior to finalization. | 25

Table ES-2. HAZ-8-MM-3. The EIR should state that for sites BJM, DPK and TWR, the draft Fire Management Plan be provided to the Conservancy for its review and comment prior to initiating construction activities. | 26

Table ES-2. WQ-1. The EIR should state that for sites BJM, DPK and TWR all stormwater and sediment generated shall be contained with the marked disturbance footprint. For site BJM, unmanaged stormwater from the existing access road to the site is causing serious erosion and damage to the Conservancy's Blackjack Campground Road which must be addressed in order to expand the uses at the BJM site. | 27

Table 2.1-1. Dakin Peak is located on Divide Rd. | 28

Table 2.1-3. Anticipated Construction Activities. It appears that both the DPK and TWR sites would require substantial amounts of cutting and filling to create sufficient space for new or replacement towers. Any fill used will need to certified as weed free. If this is not possible, funds from the interest of an invasive plant control fund will need to be provided in order for the Conservancy to perform invasive plant surveys and/or control at the sites for at least 10 | 29

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years. The applicable BIO standard should also be modified to reflect this potential invasive introduction.	29
Figure 2.1-3. The proposed new lattice towers at BJM, DPK and TWR will be significantly taller than the existing towers. The current EIR does a cursory analysis of aesthetic and viewsheds effects as well as potential for additional or worse migratory bird fatalities (See general discussion in letter).	30
Figure 2.1-4. The typical site plan appears to require substantially more space than is present in the already developed areas at these locations which will require destruction of natural habitat at DPK and TWR, which is not addressed in the EIR.	31
Section 2.1.2.1. Emergency Generators. Fuel tanks are very large and given remote locations, secondary containment must be a feature of the BJM, DPK and TWR sites.	32
Section 2.1.2.1. Lighting. Security lights should be motion sensitive and should not remain on throughout the night. Existing towers at BJM, DPK and TWR have red navigation lights. Cumulative negative effect of additional tower with light was not discussed in EIR.	33
Section 2.6. Alternatives Considered. There is no discussion as to why the existing 100 ft towers cannot be replaced with a single, new, much larger tower that can be instrumented with all the dishes and antennas required by the existing tower and the LA-RICS LMR system. This option would preserve the existing viewsheds and location aesthetics of a single tower at these locations rather than a two tower approach.	34
Section 3.1.1. Conservancy lands should be accorded the same "high visual sensitivity" as public lands where the owner/management entity is focused on natural resource protection and protection of scenic resources. The Conservancy's articles of incorporation mandate both of these for Conservancy lands. Under the 1974 Open Space Easement Agreement with Los Angeles County, Conservancy lands are also part of the Los Angeles County parks system.	35
Table 3.1-1. Regional or municipal park should also be checked for the BJM, DPK and TWR sites.	36
Section 3.1.1.3. TransCatalina Trail. As it is part of Los Angeles County Park system's trail network, please delete the "Although it has no official scenic designation."	37
Section 3.1.1.4. Conservancy lands are Open Space Easement areas in the Los Angeles County park system and should be listed in this section as such.	38
Section 3.1.2.3, 3.1.4, 3.1.5. Santa Catalina Island. The 1983 Local Coastal Plan was codified into ordinance in Title 22, Sections 22.46.050 through 22.46.750, of the Los Angeles County Code which is the controlling rule for approving development on Santa Catalina Island. Principal and	same as 11 above

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<p>Accessory Permitted Uses for Open Space/Conservation District zones are listed in Section 22.46.120 through 22.46.160. Development standards for archeological/historical, flora and fauna, soils and geology, slopes, fire, noise, view protection and signs are found in Sections 22.46.450 through 22.46.530. Development of communication equipment buildings and antennas require a Coastal Development Permit and Conditional Use Permit (Section 22.46.150) and must comply with view protection requirements in Section 22.46.520. <u>The current EIR is silent as to whether the proposed new towers at BJM, DPK and TWR will comply with the standards in Title 22 applicable to Catalina Island.</u> In addition, the addition of a second tower that is 80-100 feet taller than the existing towers at BJM, DPK and TWR, the second tower at these sites represents a <u>significant alteration of island viewsheds</u> and deserves a more robust analysis than accorded in Sections 3.1.4 and 3.1.5 of the Draft EIR, and, if eventually permitted, <u>actual mitigation</u>. Finally in addition to the Title 22 requirements, two of the three tower locations (BJM, DPK) are located in Significant Ecological Areas (SEAs). Los Angeles County Code and Policy includes an additional level of review, over and above the CDP/CUP permit processm, by the SEA Technical Advisory Committee (SEATAC) for projects located in SEAs or in LACA Lots where an SEA is located. This process is also not addressed in the relevant code summary sections of the Draft EIR.</p>	<p>same as 11 above</p> <p>same as 12 above</p>
<p>Section 3.3.1. Prior to finalizing the EIR, the extensive databases maintained by the Catalina Island Conservancy should be consulted and results included in the EIR (See attached maps). The fall floristic survey performed needs to be supplemented by a spring survey in order to be considered sufficient.</p>	<p>39</p>
<p>Table 3.1-1. For the BJM, DPK and TWR sites, plant communities within 500 feet of the existing tower include the following: Island Scrub Oak (<i>Quercus pacifica</i>) Chaparral, Coastal Sage Scrub, Non-native Grassland.</p>	<p>40</p>
<p>Table 3.3-3. The following text should be substituted for that in Table 3.3-3:</p> <p>Site BJM is located on the top of Blackjack Peak, the <u>third highest mountain</u> on Catalina Island. North facing slopes of Blackjack are dominated by intact Island Scrub Oak (<i>Quercus pacifica</i>) Chaparral; south-facing slopes are dominated by intact Coastal Sage Scrub (note: areas mapped as Bare Ground in 2003 are largely recovering into Coastal Sage Scrub). A former silver mine pit is located above the Blackjack Campground access road on the north side of the peak. Black jack peak is visible from many locations on and around Catalina Island. The Trans-Catalina Trail passes just southeast of the peak, and the Airport Road, very popular for motor tours, just to the northwest.</p>	<p>41</p>
<p>Table 3.3.-3. The plant species list in this table for Blackjack Peak should be as follows (Note all edit species list in Section 4.0 Site Summary Forms. Species not listed here have no records near project site):</p>	<p>42</p>

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The following special status species have records within 1 mile of the project site (those with an "*" within 1000 feet, those with "***" within 500 feet):

- Arctostaphylos catalinae*
- Atriplex coulteri
- Ceanothus megacarpus var. insularis
- Crossosoma californicum
- Crocanthemum greenei
- Dendromecon harfordii*
- Dichondra occidentalis
- Dissanthelium californicum
- Eriogonum giganteum var. giganteum
- Eschscholzia ramosa
- Galium catalinense ssp. catalinense
- Galium nuttallii ssp. insulare*
- Gilia nevinii
- Hordeum intercedens
- Jepsonia malvifolia
- Lepechinia fragrans
- Lyonothamnus floribundus ssp. floribundus
- Ophioglossum californicum
- Quercus tomentella
- Ribes viburnifolium
- Scrophularia villosa
- Solanum Wallacei*

42

Site DPK is located on the top of Dakin Peak, a prominent high point above Avalon and Silver/Grand Canyons. The peak is dominated by Coastal Sage Scrub with areas of Grassland (*Bromus-Avena-Nasella*) and Island Scrub Oak (*Quercus pacifica*) Chaparral. Dakin peak is visible from many locations on and around Catalina Island. The Trans-Catalina Trail follows the Divide Road immediately northwest of the existing tower. The Divide Road is also a very popular road for interior jeep tours.

43

The following special status species have records within 1 mile of the project site (those with an "*" within 1000 feet, those with "***" within 500 feet):

- Arctostaphylos catalinae
- Atriplex coulteri
- Ceanothus megacarpus var. insularis
- Crossosoma californicum
- Crocanthemum greenei
- Dudleya virens ssp. insularis

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Eriogonum giganteum var. giganteum**
 Eschscholzia ramosa
 Hordeum intercedens
 Jepsonia malvifolia
 Lyonothamnus floribundus ssp. floribundus
 Quercus tomentella
 Ribes viburnifolium
 Scrophularia villosa
 Solanum Wallacei

44

Site TWR is located on the top of Tower Peak, a prominent high point above the Isthmus/Two Harbors area. The peak is dominated by Coastal Sage Scrub with areas of Grassland (*Bromus-Avena-Nasella*) and Island Scrub Oak (*Quercus pacifica*) Chaparral. Tower Peak is visible from many locations on and around Catalina Island. The Trans-Catalina Trail follows the Banning Road immediately west of the existing tower.

45

The following special status species have records within 1 mile of the project site (those with an "*" within 1000 feet, those with "**" within 500 feet):

Atriplex coulteri
 Constancea nevinii
 Crossosoma californicum
 Cryptantha wigginsii
 Deinandra clementina
 Dichondra occidentalis
 Dissanthelium californicum (1400 feet west of site)
 Dudleya virens ssp. hassei
 Eriogonum giganteum var. giganteum
 Eriogonum grande var. grande
 Eschscholzia ramosa
 Galium catalinense ssp. catalinense
 Gambelia speciosa
 Hordeum intercedens
 Jepsonia malvifolia
 Lyonothamnus floribundus ssp. floribundus
 Pentachaeta lyonii (1400 feet northwest of site)
 Ribes viburnifolium**
 Scrophularia villosa

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Section 3.3.1.6. Local Policies and Ordinances. As discussed above for Sections 3.1.4 and 3.1.5, Catalina Island is part of unincorporated Los Angeles County and subject to land use ordinances of general applicability as well as Title 22, specific to Catalina Island.

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Section 3.3.2.3. Local Regulatory Setting. As discussed above for Sections 3.1.4 and 3.1.5, Catalina Island is part of unincorporated Los Angeles County and subject to land use ordinances of general applicability as well as Title 22, specific to Catalina Island. | 48

Table 3.3-7. Species with Suitable Habitat within Study Areas. The following should be added to this table: | 49

Burrowing Owl: BJM, DPK, TWR
California Mountain Kingsnake: BJM | 49

Section 3.3.4.1, Page 3-147 4th full paragraph and 3-148 first full paragraph. Burrowing owls are frequently observed throughout Catalina Island and should be listed for the BJM, DPK and TWR sites. | 50

Section 3.3.4.1, Page 3-149. Migratory Birds. The Draft EIR does only a cursory analysis of how migratory or resident birds or resident bats will be affected by up to three 200 foot lattice tower mounted with 80 whip antennas and multiple dishes. The island's position as a mountain in the ocean presents different risk factors than a typical mainland location to migratory species in particular who are flying across and over the Island. The Conservancy believes the Draft EIR must take a island-specific, detailed and extended look at each of the three proposed sites, with regards to the presumed increase in bird and/or bat mortality that would be expected. | Same as comment 9 above

Section 3.3.4.1, Pages 3-154 to 3-155. Santa Catalina Island Fox. The following changes should be made:

1st Paragraph, 1st Sentence should state: "The Santa Catalina Island Fox is a habitat generalist and is found throughout Catalina Island in all natural habitats and areas of human habitation and development."

1st Paragraph, last sentence should state: "Young can be born any time from late February through late April..." | 51

2nd Paragraph, should state: "The major threat to Catalina Island Foxes have been disease outbreaks, e.g. the canine distemper outbreak in the late 1990s that almost wiped out the population, and mortality from vehicle collisions or other dangers associated with human development, e.g. drowning in open containers of liquids, poisoning, becoming trapped in open excavations. Catalina Island Foxes should be expected at all three Catalina Island project sites and should definitely expected to investigate any changes to the sites during active construction, especially open holes and trenches, open containers of liquids and improperly enclosed solid or food wastes."

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<p>3rd Paragraph, Construction Impacts should read: The noise and activities associated with construction of the proposed Project sites could result in temporary disturbance of fox. Therefore, construction cannot be initiated from late February the end July. Foraging foxes will investigate the construction site for new food sources and for cover in uncovered excavations, under equipment or stored materials. Discarded food and trash is effectively an attractive nuisance for foxes and can result in increased habituation and dependence on humans for food."</p>	51
<p>BIO-MM-19(e). Add the following: "Any trenches, holes or other excavations that are not covered at the end of the work day, must be provided with a fox escape ramp."</p>	52
<p>BIO-MM-20(a). Add the following: "Crews should be informed that there is absolutely no feeding of foxes allowed on Catalina Island."</p>	53
<p>Section 3.3.4.1, Pages 3-157 to 3-158. Small Animals, California Mountain Kingsnake, Coast Horned Lizard, San Diego Woodrat, Tehachapi Pocket Mouse, Townsend's Big-eared Bat and Western Mastiff Bat. The Conservancy has documentation of California Mountain Kingsnake at nearby Blackjack Campground. Townsend's Big-eared Bats breed on Catalina Island in caves and abandoned mines.</p>	54
<p>Section 3.3.4.1, Pages 3-158 and 3-159. BJM should be added to the list of sites at the top of page 3-158, in the fourth full paragraph of page 3-158, and in the first full paragraph on page 3-159.</p>	55
<p>Section 3.3.4.1, Page 3-168. BIO-MM-23(a). Add the following: "For sites BJM, DPK and TWR, only seed or plant material from the Catalina Island Conservancy's native plant nursery shall be used."</p>	same as comment 22
<p>Section 3.3.4.1, Page 3-169. BIO-MM-23(b). Add the following: "For sites BJM, DPK and TWR, all construction vehicles and equipment shall be washed prior to being brought to Catalina Island and shall not enter Conservancy property until it is inspected by the Conservancy's Invasive Plant Program Manager.</p>	56
<p>Section 3.3.4.1, Page 3-207. See earlier comment regarding reference to Title 22 regulations.</p>	57
<p>Table 3.3-12. Special Status Species. The following species should be added to this table for Sites BJM, DPK and TWR:</p> <p>Burrowing Owl Island Loggerhead Shrike Catalina Island Quail San Clemente Spotted Towhee Hutton's Vireo</p>	58

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In addition, the consultant should refer to Appendix G of the LCP for other species of special concern regulated under Title 22 of the LA County Code. | 58

Section 3.4. Cultural Resources. Extensive prehistoric and historic cultural resources are present nearly everywhere on Catalina Island. Human habitation and use of the island extends at least to 8,000 BP and likely much earlier. Any excavation or drilling, even in previously developed areas, should expect to encounter cultural artifacts, human remains, middens, lithic scatters, and/or habitation sites. All three Catalina Island sites have mapped cultural locations in or near the project location (see attached maps). No excavation or soil disturbance should be undertaken without an archeological monitor present. All of the tables and text in Section 3.4 should be edited to include BJM, DPK and TWR as actual or likely locations for cultural resources to be present. | 59

Section 4.0. Site Summary Forms.

All site summary forms for BJM, DPK and TWR should be thoroughly edited to reflect changes discussed above. | 60

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Responses to Comment Letter NGO 3

The Authority appreciates your comments on the Draft EIR dated February 25, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: Aesthetic/Viewshed Analysis. Based on our review of the Draft EIR, the document plays short shift with this issue, basically concluding that since there is already a 100 foot tower at all three proposed sites (BJM, DPK, TWR), there are no aesthetic or viewshed issues with building a second 180-200 feet tower (plus 15 foot lighting rod) adjacent to the existing tower. It is the Conservancy's position that "co-location" does not resolve this issue for Catalina Island. All three existing towers can be viewed from multiple, long distance vantages as you approach Catalina Island from the sea. They are also distinct features from multiple vantages throughout Catalina Island's interior. Blackjack Peak is the third highest mountain on Catalina Island and it and its tower can be seen from locations from the far East End to the far West End of the Island.

Response to Comment 1: Of the three proposed sites on Catalina Island, the existing tower at Site TWR site is 100 feet tall; the existing tower at Site BJM is 125 feet tall; and the existing tower at Site DPK is 200 feet tall, as noted in the Draft EIR at pages 4-110 and 4-335, respectively. Each existing tower is a lattice type. The existing towers are prominent visual features in the existing landscape, as shown in the example photos below of Site BJM. Based on the existing visual conditions at these sites, the Draft EIR describes the visual impact of locating new towers at these sites, and concludes that the addition of these towers would not result in a significant visual impact. (See DEIR pp. 4-113 to 4-114 (BJM), pp. 4-338 to 4-339 (DPK), and pp. 4-1802 to 4-1803 (TWR).) Additionally, two separate towers would be viewed as one structure from vantage points where one tower is in front of, and thus blocks views of, the other, and the increase in bulk associated with two separate towers would be minimal due to the linear nature of the structures. The comment provides no evidence that that requires a revision to the conclusions in the Draft EIR.





The comment is correct that all three existing towers could be viewed from multiple, long-distance vantages on the approach to Santa Catalina Island from the sea. However, collocating the towers would result in the two towers appearing more indistinguishable as separate structures (see photos of site BJM below). The sites would also be obscured by extremely steep cliffs as boaters approach the island, particularly south and north of Site TWR, south and east of Site DPK, and north of Site BJM.

In addition, the heights of the proposed towers may ultimately be lower than analyzed in the Draft EIR. If the project is approved, tower heights would be optimized based on the final system design. Some sites would be constructed as they are described in the Draft EIR. Other sites may be designed to a shorter height if additional site information or system requirements found during later design stages made this feasible. At this time, however, it would be speculative to identify which sites might ultimately accommodate a reduced tower height.





Comment 2: The new towers will be twice as tall, wider at the base, and also permanently lit at night. They will permanently and irrevocably alter the skyline of the Island. The Conservancy believes the Draft EIR must take an island-specific, detailed and extended look at this issue and how it should be resolved for all three proposed Catalina Island sites.

Response to Comment 2: While the new towers would be taller, they would not be “twice as tall” as existing towers. The BJM tower would be up to 180 feet tall and sited adjacent to an existing 125-foot tower; the DPK tower would be the same size as the existing tower (both 200 feet tall); and the TWR tower would be up to 180 feet tall and sited adjacent to an existing 100-foot tower. The lightning rods would be of such insignificant girth as to be generally indistinguishable from most viewing distances. Also, the heights of the proposed towers may ultimately be less than described in the Draft EIR, as explained above. Lighting at the tower is addressed for Site BJK at page 4-114, for Site DPK at page 4-339, and for Site TWR at page 4-1803. The analysis shows that regardless of the type of FAA-required lighting, no substantial new source of light or glare would be introduced at any of these sites.

While the new towers would alter the Island’s skyline, the Island’s skyline has already been altered by the presence of the existing towers. The new towers would not “substantially degrade the existing visual character or quality of the site and its surroundings” (Impact AES-3). Although the new towers would introduce a new manmade element to each site, the existing conditions demonstrate a substantially altered visual environment.

Comment 3: Alternatives Analysis. This issue is closely related to the aesthetic/viewshed issue. The Conservancy believes the alternatives analysis in the Draft EIR is incomplete in that it does not specifically address at least two obvious alternatives than the one selected. First, the Draft EIR does not address whether the existing 100 foot towers could be replaced by a single larger tower that could house all of the antennas and dishes of the existing tower plus the antennas and dishes for the LA-RICS LMR project. This alternative, if acceptable, would help to resolve the aesthetic/viewshed issue discussed above in that while the replacement tower would be much taller, there would still only be one tower at each of the three sites.

Response to Comment 3: As a preliminary matter, the existing towers at the three sites are not all 100 feet tall. The existing tower at Dakin Peak (DPK) is 200 feet while the towers at Tower Peak (TWR) and Black Jack Peak (BJM) are 100 feet and 125 feet tall, respectively. Regarding the suggested alternative of placing existing equipment and proposed LMR equipment all on a single larger tower, each of the existing towers currently has a substantial number of antennas, and the proposed project would add a minimum of twenty five (25) additional antennas to each site. Collocating all of this equipment on a single tower would require installation of a substantially taller and larger tower. Given the open nature of the surrounding landscape, replacing an existing tower with a new tower of an increased size and height would create a greater visual intrusion than the proposed addition of a single tower of the same or similar height to the existing structure. A higher tower would be more visible from a greater distance than two separate towers, particularly from distant vantage points such as boats approaching the Island. In addition, two separate towers would be viewed as one structure from vantage points where one



tower is in front of, and thus blocks views of, the other. The increase in bulk associated with two separate towers would also be minimal due to the linear nature of the structures compared to the increase in height that would be required to accommodate all existing and proposed equipment on a single tower. For these reasons, the alternative of placing existing equipment and proposed LMR equipment all on a single larger tower would not reduce or avoid the visual impacts of the proposed project at these sites, and no revisions to the Draft EIR are required to analyze this alternative.

Comment 4: Second, the Draft EIR does not discuss as an alternative whether an additional tower is actually needed at all three locations to accomplish the LA-RICS LMR project goals.

Response to Comment 4: The Authority did examine whether the existing towers could accommodate the proposed installation of LMR equipment in addition to the equipment currently located on the existing towers. As discussed above, each of the existing towers currently has a substantial number of antennas, and the proposed project would add a minimum of twenty five (25) additional antennas to each site. The Authority determined that it would not be feasible to locate all of the existing and proposed equipment on the existing towers, and that new towers would be required for each of the three sites to accommodate the proposed LMR equipment.

Comment 5: Third, the Draft EIR does not discuss whether a second much larger tower at one location plus larger replacement towers at the other two sites is an option (or other variants on this theme).

Response to Comment 5: The alternative suggested in this comment is unclear, but seems to suggest installation of larger towers at the three sites on the Island than currently proposed. Installing larger towers than those proposed would result in increased visual and other impacts. As such, the Draft EIR does not require revisions to analyze this alternative. The Authority’s proposed design seeks to minimize the impacts on aesthetics while still meeting project objectives.

Comment 6: The Conservancy believes the Draft EIR must take an island-specific, detailed and extended look at this issue and how it should be resolved for all three proposed Catalina Island sites. The Conservancy believes the project proponent should provide to the Conservancy and the Island Community 3D animations from multiple vantage points and appropriate GIS maps of the various alternatives for all three sites discussed here and in the Draft EIR.

Response to Comment 6:

Site-specific analysis is provided in Chapter 4 for sites BJM (at pages 4-110 et seq.), DPK (at pages 4-335 et seq.), and TWR (at pages 4-1799 et seq.). The methodology for aesthetic impact analysis, provided in Section 3.1.4 starting on page 3-26 of the Draft EIR was applied to these sites. 3D animations from multiple vantage points and GIS maps of the commenter’s suggested alternatives are not a requirement for aesthetic impact assessment. An EIR is to be prepared with “a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is



reasonably feasible.” (CEQA Guidelines § 15151.) Additionally, “reviewers [of an EIR] should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.” (CEQA Guidelines § 15204(a).) No change has been made to the Draft EIR.

Comment 7: Environmental/Mitigation Issues. As outlined in detail in Attachment A, the project as proposed entails a number of less-than-trivial environmental and mitigation issues. The Conservancy has proposed Catalina-specific language and requirements that it would like to see incorporated into the various tables and text of the Draft EIR. Three main issues emerge from the Conservancy’s review of the environmental issues associated with the project:

Response to Comment 7: Please see the responses to the comments in Attachment A, below, regarding the environmental and mitigation issues referenced in this comment. Please see the responses below for responses to the three main issues referenced in this comment.

Comment 8: 1) While the Blackjack site appears to have an already developed pad that would allow the construction of a new or replacement tower without further habitat disturbance, the Dakin Peak and Tower Peak sites do not appear large enough to accomplish this with permanent alteration of natural habitat. In particular, level ground at the Tower Peak site is fully occupied by the existing tower, shed, and generator and to co-locate a second tower or even replace the existing tower with a new larger tower would appear to require cutting down the existing peak 1-0-20 feet or more or significant fill and grading to create a large enough level space. Given the stringent regulatory requirements specific to Catalina Island in the Los Angeles County Zoning Code (see discussion below), the Conservancy believes the Draft EIR must take an island-specific, detailed and extended look at each of the three proposed sites, with actual, not “typical” site plans.

Response to Comment 8: The level of disturbance associated with project site development at all sites is limited to that analyzed in the EIR, as described in Section 2.1.3, and on a site specific basis for sites BJM (at page 4-110), DPK (at page 4-335), and TWR (at page 4-1799). The Authority will examine each site based on the site’s unique characteristics and propose the least intrusive installation while still meeting the Project’s Objectives. Regarding the request for “an island-specific, detailed and extended look at each of the three proposed sites”, please see response to comment 6 regarding the level of detail required in an EIR.

Comment 9: 2) The Draft EIR does only a cursory analysis of how migratory or resident birds or resident bats will be affected by up to three 200 foot lattice tower mounted with 80 whip antennas and multiple dishes. The island's position as a mountain in the ocean presents different risk factors than a typical mainland location to migratory species in particular who are flying across and over the



Island. The Conservancy believes the Draft EIR must take an island specific, detailed and extended look at each of the three proposed sites, with regards to the presumed increase in bird and/or bat mortality that would be expected.

Response to Comment 9: Please note that only one of the proposed towers on the Island (DPK) would be 200 feet. The others (BJM and TWR) are proposed at up to 180 feet. The Cumulative Impact Analysis section (3.3.5.3) on pages 3-239 through 3-241 of the Draft EIR gives an extensive discussion on the effects of towers on birds. BIO MM 18 (h) and (i) (page ES-44) give protection measures for migratory birds in relation to the communication towers. This measure states that the USFWS Office of Migratory Birds voluntary guidelines for communications towers will be followed for all sites (<https://www.fws.gov/Midwest/es/planning/pdf/USFWS2013RevisedGuidanceCommTowers27Sept13.pdf>). In addition, this measure requires coordination with USFWS and FAA to implement their lighting requirements (http://www.faa.gov/documentLibrary/media/Advisory_Circular/AC_70_7460-1L_.pdf) with the minimal attraction and resulting mortality to migratory birds. These impacts will be addressed and minimized to the extent possible at *all* sites, including BJM, DPK, and TWR, individually based on coordination with FAA and USFWS. As noted at pages 3-157 and 3-158, impacts to bats are not anticipated. Additional text associated with this analysis will be included for the discussion of sites BJM, DPK, and TWR in this section in the Final EIR, as follows:

Bat mortality is not a concern due to new towers being added to any site or addition of lighting. Bats may be attracted to the lights for insect foraging, but strikes are not anticipated as all parts of the towers will be stationary and not mobile, thus allowing the bats to navigate safely around the structures.

Comment 10: 3) The Draft EIR should include on-the-ground mitigation proposals and not just the “process” (plans, inspections, construction practices, etc.) proposed in the Draft EIR. The Conservancy will expect that unavoidable, and permanent habitat or species impacts will be mitigated by on-the-ground improvements and long-term monitoring (e.g. of bird or bat mortality) funded by annual return from a monitoring fund.

Response to Comment 10: With the exception of cumulative impacts to migratory birds, the Draft EIR concluded that impacts to certain biological resources at sites BJM, DPK, and TWR would be significant but impacts would be reduced to less than significant with implementation of mitigation measures. A total of 16 mitigation measures were identified for implementation to protect biological resources at sites BJM, DPK, and TWR. These included measures specifically designed to avoid or minimize impacts to special status species and habitats. Since impacts have been determined to be less than significant after application of the measures identified in the Draft EIR, CEQA does not require further mitigation measures to be applied at sites BJM, DPK, and TWR.

Comment 11: Local Zoning Requirements. Finally, the Conservancy was surprised to not find any discussion of the stringent zoning requirements applicable to the Island found in Title 22 of the Los Angeles County Code. The 1983 Local Coastal Plan, which is referenced in the Draft EIR, was codified



into ordinance in Title 22, Sections 22.46.050 through 22.46.750, of the Los Angeles County Code and is the controlling rule for approving development on Santa Catalina Island. Principal and Accessory permitted Uses for Open Space/Conservation District zones are listed in Section 22.46.120 through 22.46.160. Development standards for archeological/historical, flora and fauna, soils and geology, slopes, fire, noise, view protection and signs are found in Sections 22.46.450 through 22.46.530. Development of communication equipment buildings and antennas require a Coastal Development Permit and Conditional Use Permit (Section 22.46.150) and must comply with view protection requirements in Section 22.46.520. The current EIR is silent as to whether the proposed new towers at BJM, DPK, and TWR will comply with the standards in Title 22 applicable to Catalina Island. Again, the Conservancy believes the Draft EIR must take an island specific, detailed and extended look at each of the three proposed sites in relation to now codified LCP in Title 22.

Response to Comment 11: Section 3.9.1.3 of the Draft EIR addresses sites in the coastal zone and the policies of the Local Coastal Plan that are most applicable to the proposed telecommunications facilities. Section 3.1.2.3 of the Draft EIR addresses relevant policies of the Santa Catalina Island LCP, and Table 3.9-2 identifies Sites BJM, DPK, and TWR as being located within the Santa Catalina Island Coastal Zone. Table 3.9-5 identifies site characteristics and coastal zone policies of relevance. The final determination of consistency for sites BJM, DPK, and TWR would be made by the Los Angeles County Department of Regional Planning, the agency responsible for issuing a Coastal Development Permit. If a permit is issued, operation and maintenance of the site would occur consistent with any applicable permit conditions.

Additionally, Table 3.9-4 identifies planning and/or zoning designations for the proposed project sites. As shown in that table, the EIR's analysis found that implementation of the proposed project at sites BJM, DPK and TWR would not be inconsistent with relevant general plan and zoning designations.

The Authority will comply with Title 22 of the Los Angeles County Code as it develops the three sites on Santa Catalina Island, and the Final EIR has been updated at Section 3.9.4.1 to explicitly include this information in the discussion regarding the *Santa Catalina Island Local Coastal Plan*. Additional information relevant to biological resources, specifically plant species identified in Section 22.46.470 (Appendix G), has been included in the Final EIR in a list at Section 3.3.1.2. The added plant species would be considered during the coastal development permitting process. The proposed project and Mitigation Measures meet and/or exceed those measures outlined in Section 22.46.470 – Flora and Fauna. Relevant subsections of 22.6.470 include Section A, which requires a site plan with a 100 foot buffer of mapped vegetation prepared by a qualified botanist, impact analysis on native vegetation and wildlife, and suggested mitigation measures including transplanting vegetation or revegetating impacted areas; and Section B, preventing development that would remove or damage “rare or endangered plant species” as defined in Appendix G of the 1989 Santa Catalina Island Specific Plan; and G, development within SEAs shall be subject to Title 22 except for the exemption provisions contained in Section 22.56.215. The Authority believes that incorporation of the BIO MM 1, 2, 8, 3, 4, 5, 6, 8, 9, 10, 11, 17, 18, 19, 20, 23, and 24 at all sites on Santa Catalina Island will ensure adherence to Title 22 with regards to biological resources. These revisions do not result in any changes to the conclusions in the Draft EIR.



Comment 12: Finally in addition to the Title 22 requirements, two of the three tower locations (BJM, DPK) are located in Significant Ecological Areas (SEAs). Los Angeles County Code and Policy includes an additional level of review, over and above the CDP/CUP permit process, by the SEA Technical Advisory Committee (SEATAC) for projects located in SEAs or in LACA Lots where an SEA is located. This process is also not addressed in the relevant code summary sections of the Draft EIR.

Response to Comment 12: Section 3.3.2.3 of the Draft EIR acknowledges that the Los Angeles County SEAs ordinance regulates a wide range of biotic communities through the use of environmentally sensitive development standards and designs, and acknowledges the permitting process associated with these areas. Section 3.3.2.3 of the Draft EIR also discusses SEAs and explains that properties mapped within, or partially within, an adopted SEA are subject to the rules in the SEA ordinance. Table 3.3-10 acknowledges that the three sites are under the jurisdiction of the Santa Catalina Island Local Coastal Plan. The site-specific analysis beginning at page 4-121 and continuing at pages 4-123 and 4-125 (for Site BJM); at page 4-345 and continuing at pages 4-347 and 4-348 (for Site DPK); and at page 4-1809 and continuing at pages 4-1811 and 4-1812 (for Site TWR) provide SEA/CRA status and analysis of consistency with the LCP at each of the sites. As noted in the impact discussion for the three sites under Impact LU-2 (beginning at page 4-138 for Site BJM, page 4-363 for Site DPK and page 4-1827 for TWR), the final determination of consistency with the plan would be made by the agency responsible for issuing the coastal permit. If the permit were issued, activities at each site would occur consistent with any applicable permit conditions. Table 3.3-10 has been updated to reference the SEA/CRA designation applicable at the three sites. These revisions do not result in any changes to the conclusions in the Draft EIR.

Comment 13: Table ES-2. AES-1 through 4. As discussed in the general comments section, the Conservancy does not concur with the analysis or results of the Aesthetic Review.

Response to Comment 13: Comment noted. See response to comment #1 and #2 above for additional information.

Comment 14: Table ES-2. BIO-MM-1. The EIR should state the Conservancy will need to review and concur in the Mitigation Monitoring and Reporting Plan (MMRP) and Worker Environmental Awareness Program (WEAP) plans prior to initiating any construction activities on its lands.

Response to Comment 14: In response to the comment, the following changes were made to BIO MM 1:

Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement a mitigation monitoring and reporting plan (MMRP) for the proposed Project. The MMRP would serve to organize environmental compliance requirements identified in best management practices, mitigation measures, permit requirements, real property agreement conditions, [coordination with the land management agency\(s\)](#), and other applicable sources. The MMRP shall contain an organization chart and communication plan for environmental compliance as it relates to the proposed Project.

And to BIO MM 2:

BIO MM 2 Worker Environmental Awareness Program: Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement, [including coordination with the respective land management agency](#), a Worker Environmental Awareness Program (WEAP) for the proposed Project. This mitigation measure would serve to institute and formalize an education program to increase awareness of environmental resources and measures and rules that are in place to help minimize impacts to those resources.

Comment 15: Table ES-2. BIO-MM-1. The EIR should state that for sites DPK, BJM, TWR the biological monitor shall visit the sites at least once per week during weeks when construction workers are present on site, and at least monthly during periods when active construction is not occurring but the project is not yet completed and the biological monitor shall contact the Conservancy's Director of Conservation prior to each visit in order to coordinate a joint site inspection with Conservancy staff.

Response to Comment 15: The revision to BIO MM 1 to add “coordination with respective land management agencies”, as outlined in response to comment #13 above, will allow the Conservancy to request site-specific details through Authority/Conservancy coordination such as the biological monitoring site visit schedule suggested in Comment #14. No additional change has been made to BIO MM 1.

Comment 16: Table ES-2. BIO-MM-4. Site Sanitation. The EIR should state that all solid waste will be placed in wildlife proof containers with tight fitting secure lids. Containers with any liquids of any sort, e.g. drums, roll-off boxes, dumpsters, etc., shall be tightly sealed to prevent foxes or other wildlife from drowning in the containers.

Response to Comment 16: The revision to BIO MM 1 to add “coordination with respective land management agencies”, as outlined above, will allow the Conservancy to request site specific details through Authority/Conservancy coordination such as the solid waste provisions suggested in Comment #15. No change has been made to BIO MM 4.

Comment 17: Table ES-2. BIO-MM-5. The EIR should state that only "hazardous materials" allowed on the site are fuel, equipment lubricants or other materials, such that if disposed would not be considered "hazardous waste" under the Resource Conservation and Recovery Act (RCRA) or equivalent state law hazardous waste definitions.

Response to Comment 17: The revision to BIO MM 1 to add “coordination with respective land management agencies”, as outlined above, will allow the Conservancy to request site-specific details through Authority/Conservancy coordination such as the hazardous waste requirements suggested in Comment #16. No change has been made to BIO MM 5.



Comment 18: Table ES-2. BIO-MM-8. The EIR should specifically reference the Catalina Island Fox for sites BJM, DPK and TWR and state that all holes, trenches or other excavations must be completely and securely covered at the end of each work day and/or provided with fox escape ramps.

Response to Comment 18: Components of trench and hole management in reference to the Catalina Island Fox were included in the Draft EIR. The EIR specifically references the Catalina Island Fox for sites BJM, DPK, and TWR in Section 3.3, Santa Catalina Island Fox (page 3-154) and trench management under BIO MM 19 Trenches and Holes Management (pages ES-44 and 3-155-6). Trenches and holes would be covered and secured, as noted in subsection a), b), and e). Since all trenches and holes would be secured and inspected, no fox escape ramps would be necessary. No change has been made to BIO MM 8.

Comment 19: Table ES-2. BIO-MM-9(b). The EIR should state that surveys for special status plant species at sites BJM, DPK, and TWR will be performed during the appropriate time of year for the particular species, e.g. spring surveys for special status annual plants, to be observed and identified.

Response to Comment 19: The Draft EIR currently requires special status plant surveys to occur “in the proper season and in suitable habitat” (BIO MM 24). The phrase implies spring surveys for special status annual plants and any other season requirements for each plant species. The Draft EIR specifically references the Special Status Plants Surveys and Protection for sites BJM, DPK, and TWR in Table ES-2, and in Section 3.3, Special Status Plants: (page 3-167) and under BIO MM 24 Special Status Plants Surveys and Protection (pages ES-47 and 3-169). See page ES-47 for the full text for BIO MM 24 Special Status Plants Surveys and Protection. No change has been made to BIO MM 9.

Comment 20: Table ES-2. BIO-MM-9(f). The EIR should state that for sites BJM, DPK and TWR the limits of disturbance shall be clearly delimited with properly installed construction fencing or closely spaced 4 foot grading stakes with at least two signs per side of the construction site that state, "No Equipment or Soil Disturbance Beyond this point."

Response to Comment 20 The revision to BIO MM 1 to add “coordination with respective land management agencies”, as outlined above, will allow the Conservancy to request site-specific details through Authority/Conservancy coordination such as the fencing requirements suggested in Comment #19. No change has been made to BIO MM 9.

Comment 21: Table ES-2. BIO-MM-11. The EIR should state that for sites BJM, DPK and TWR the project contactor(s) shall obtain all necessary Conservancy vehicle access permits at least 30 days prior to bringing vehicles or other wheeled equipment onto Conservancy lands. project contractor(s) shall also provide proof of insurance (\$1,000,000) for any damage to Conservancy infrastructure and provide a written plan for how Conservancy primary and secondary roads will be used, contingencies for non-use or upgrade during rainy periods, frequency of access, minimizing ingress and egress, etc.

Response to Comment 21: The revision to BIO MM 1 to add “coordination with respective land management agencies”, as outlined above, will allow the Conservancy to request site-specific details



through Authority/Conservancy coordination such as this issue. No change has been made to BIO MM 11.

Comment 22: Table ES-2. BIO-MM-23(a). The EIR should state that for sites BJM, DPK and TWR only seeds or plants obtained from the Conservancy's native plant nursery will be used for revegetating disturbed ground at the project sites.

Response to Comment 22: The revision to BIO MM 1 to add “coordination with respective land management agencies”, as outlined above, will allow the Conservancy to request site-specific details through Authority/Conservancy coordination such as the native seed provisions suggested in Comment #21 above. No change has been made to BIO MM 23(a).

Comment 23: Table ES-2. BIO-MM-23(b). The EIR should state that for sites BJM, DPK and TWR, vehicles or other equipment shall enter Conservancy unless inspected by the Conservancy's invasive plant Program Manager.

Response to Comment 23: The revision to BIO MM 1 to add “coordination with respective land management agencies”, as outlined above, will allow the Conservancy to request site-specific details through Authority/Conservancy coordination such as the invasive species prevention protocol suggested in Comment #22 above. No change has been made to BIO MM 23(b).

Comment 24: Table ES-2. CUL-1. The EIR should add BJM, DPK and TWR to the "sites" column for CUL-1 rows. All three sites have known cultural locations on (BJM) or within 500 foot buffer. The EIR should state that for sites BJM, DPK and TWR that an archeology monitor is present at all times excavation is occurring at each site.

Response to Comment 24: Based on records searches and field surveys, no prehistoric or historic archaeological resources were identified at sites BJM, DPK, or TWR that would be impacted by LMR project activities. However, to accommodate the concerns of the commenter, an archaeological monitor will be present during all ground-disturbing activities at sites BJM, DPK, and TWR. This information will be included for the three sites in Section 3.4.5.1, and at page 4-125 (for Site BJM), page 4-349 (for Site DPK), and page 4-1813 (for Site TWR). These revisions do not result in any changes to the conclusions in the Draft EIR.

Comment 25: Table ES-2. HAZ-4-MM-1. The EIR should state that for sites BJM, DPK and TWR the construction contractor shall coordinate the completion of the Phase I audit with the Conservancy's Chief of Conservation and provide the Conservancy an opportunity to review the draft audit prior to finalization.

Response to Comment 25: An environmental database records search was conducted for all proposed Project sites as described in Section 3.7.1.1 on page 3-370 of the Draft EIR. As a result of this records search, these three sites were identified as “no concern to encounter recognized environmental

concerns during intrusive site-related activities” as listed in Table 3.7-5 on page 3-373 of the Draft EIR. Therefore, HAZ MM 1 is not required at these sites. No change has been made to the Draft EIR.

Comment 26: Table ES-2. HAZ-8-MM-3. The EIR should state that for sites BJM, DPK and TWR, the draft Fire Management Plan be provided to the Conservancy for its review and comment prior to initiating construction activities

Response to Comment 26: A copy of the draft Fire Management Protection Plan will be provided to the Conservancy for review and comment.

Comment 27: Table ES-2. WQ-1. The EIR should state that for sites BJM, DPK and TWR all stormwater and sediment generated shall be contained with the marked disturbance footprint. For site BJM, unmanaged stormwater from the existing access road to the site is causing serious erosion and damage to the Conservancy's Blackjack Campground Road which must be addressed in order to expand the uses at the BJM site.

Response to Comment 27: During construction, as described in Section 2.0 – Description of Project, on pages 2-36 through 2-38, stormwater and sediment would be controlled through use of Best Management Practices (BMPs). BMPs include evaluation of the site conditions and may include diversion of stormwater from coming on to the project during construction, control of stormwater runoff during construction with use of berms, hay bales, and sand bags, and control of sediment runoff with fiber rolls, hay bales, silt fences, covering of stockpiles, and minimizing exposed areas to the maximum extent possible. Stormwater generated on site will be directed towards existing drainages (manmade or natural). If required, baffle systems such as gravel or rock will be put in place to reduce flow rate of water and help prevent erosion. The design of the facility will include review of stormwater flow to and from the site. Stormwater will be directed towards natural or manmade drainages, and as required, may have baffle systems to reduce flow rate of water to reduce the potential for erosion. Design of the facility will include analysis of stormwater flow across and through the site. Grading of project will incorporate appropriate stormwater management design requirements and will be reviewed and approved by the appropriate agency issuing the building permit.

Comment 28: Table 2.1-1. Dakin Peak is located on Divide Rd.

Response to Comment 28: Table 2.1-1 of the Draft EIR has been revised to indicate the location of the proposed Dakin Peak site on Divide Road. The address for Site DPK on the site summary form in Chapter 4 has also been revised.

Comment 29: Table 2.1-3. Anticipated Construction Activities. It appears that both the DPK and TWR sites would require substantial amounts of cutting and filling to create sufficient space for new or replacement towers. Any fill used will need to certified as weed free. If this is not possible, funds from the interest of an invasive plant control fund will need to be provided in order for the Conservancy to perform invasive plant surveys and/or control at the sites for at least 10 years. The applicable BIO standard should also be modified to reflect this potential invasive introduction.

Response to Comment 29: The level of disturbance associated with project site development at all sites is limited to that analyzed in the EIR, as described in Section 2.1.3, and on a site-specific basis for sites BJM (at page 4-110), DPK (at page 4-335), and TWR (at page 4-1799). The Authority will examine each site based on the site’s unique characteristics and propose the least intrusive installation while still meeting the project’s objectives.

Comment 30: Figure 2.1-3. The proposed new lattice towers at BJM, DPK and TWR will be significantly taller than the existing towers. The current EIR does a cursory analysis of aesthetic and viewsheds effects as well as potential for additional or worse migratory bird fatalities (See general discussion in letter).

Response to Comment 30: See responses to comments #1, #2, and #8 above.

Comment 31: Figure 2.1-4. The typical site plan appears to require substantially more space than is present in the already developed areas at these locations which will require destruction of natural habitat at DPK and TWR, which is not addressed in the EIR.

Response to Comment 31: See response to Comment 28.

Comment 32: Section 2.1.2.1. Emergency Generators. Fuel tanks are very large and given remote locations, secondary containment must be a feature of the BJM, DPK and TWR sites.

Response to Comment 32: As noted at Section 3.7.4.1 and on a site-specific basis (at page 4-131 for Site BJM, page 4-355 for Site DPK, and 4-1819 for Site TWR) of the Draft EIR, the proposed fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented.

Comment 33: Section 2.1.2.1. Lighting. Security lights should be motion sensitive and should not remain on throughout the night. Existing towers at BJM, DPK and TWR have red navigation lights. Cumulative negative effect of additional tower with light was not discussed in EIR.

Response to Comment 33: Tower and security lighting for sites BJM, TPK, and TWR are described in Draft EIR Section 3.1.4.1 (Project Analysis) on page 3-42 under Rural or Remote areas. Cumulative lighting analysis is discussed in Draft EIR Section 3.1.5.3 (Cumulative Impact Analysis) on page 3-45 under AES-4. The Authority concurs that motion sensitive security lighting should be applied at remote sites, including sites BJM, DPK, and TWR. Section 2.1.2.1 will be updated to reflect this new information. These revisions do not result in any changes to the conclusions in the Draft EIR. Based on the analysis methodology developed for the Draft EIR, no other past present or reasonably foreseeable additional projects were noted within 0.25 mile of any of the three sites. Therefore, no cumulative impact from light and glare would occur.

Comment 34: Section 2.6. Alternatives Considered. There is no discussion as to why the existing 100 ft towers cannot be replaced with a single, new, much larger tower that can be instrumented with all



the dishes and antennas required by the existing tower and the LA-RICS LMR system. This option would preserve the existing viewsheds and location aesthetics of a single tower at these locations rather than a two tower approach.

Response to Comment 34: See response to comment #3.

Comment 35: Section 3.1.1. Conservancy lands should be accorded the same "high visual sensitivity" as public lands where the owner/management entity is focused on natural resource protection and protection of scenic resources. The Conservancy's articles of incorporation mandate both of these for Conservancy lands. Under The 1974 Open Space Easement Agreement with Los Angeles County, Conservancy lands are also part of the Los Angeles County parks system.

Response to Comment 35: The Draft EIR *does* identify that the Conservancy lands are an area of high visual sensitivity, as shown in Figure 3.1-1 on page 3-6 and on Table 3.1-1 (page 3-7), where sites BJM, DPK, and TWR are all listed as having high visual sensitivity and being located within a scenic vista, the coastal zone, and adjacent to a regional trail. These sites are also described on page 3-17 under the discussion of the Trans-Catalina Trail, and are listed on page 3-28 as sites located within an area that would be considered a scenic vista.

Comment 36: Table 3.1-1. Regional or municipal park should also be checked for the BJM, DPK and TWR sites.

Response to Comment 36: The Catalina Island Conservancy Open Space Easement has been added in the column for regional or municipal park for these sites in Table 3.1-1 of the Draft EIR. A discussion of the Catalina Island Conservancy Open Space Easement has been added as described in the response to comment 36 below. These revisions do not result in any changes to the conclusions in the Draft EIR.

Comment 37: Section 3.1.1.3. Trans Catalina Trail. As it is part of Los Angeles County park system's trail network, please delete the "Although it has no official scenic designation."

Response to Comment 37: The text has been deleted in accordance with this comment. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 38: Section 3.1.1.4. Conservancy lands are Open Space Easement areas in the Los Angeles County park system and should be listed in this section as such.

Response to Comment 38: A discussion of the Catalina Island Conservancy Open Space Easement has been added to Section 3.1.1.4. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 39: Section 3.3.1. Prior to finalizing the EIR, the extensive databases maintained by the Catalina Island Conservancy should be consulted and results included in the EIR (See attached maps). The fall floristic survey performed needs to be supplemented by a spring survey in order to be considered sufficient.



Response to Comment 39: Thank you for offering the Conservancy’s database. Please note that the maps that were attached to the comment letter have been redacted. Botanical surveys, as implemented under BIO MM 24 – Special Status Plant Surveys and Protection, will target any special-status plants that have the potential to occur at the project sites. BIO MM 1, as revised in comment #13, will provide the Conservancy a chance to specify details (e.g., add special-status plants from the Conservancy’s database), prior to finalization of the MMRP. Therefore, qualified botanists will have updated population and location information prior to conducting surveys.

In compliance with BIO MM 24 (page ES-47) surveys for special status plants shall be conducted by a qualified botanist prior to ground-disturbing activities in the proper season and in suitable habitat. Surveys would be conducted in the appropriate season and for the appropriate conditions for the given species, as noted in Section 3.1, Special Status Plants (page 3-167),” Each species has specific habitat requirements and a species-appropriate survey period.”

Comment 40: Table 3.1-1. For the BJM, DPK and TWR sites, plant communities within 500 feet of the existing tower include the following: Island Scrub Oak (*Quercus pacifica*) Chaparral, Coastal Sage Scrub, Non-native Grassland.

Response to Comment 40: Table 3.3-1 was revised to add sites BJM, DPK, and TWR to these plant communities. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 41: Table 3.3-3. The following text should be substituted for that in Table 3.3-3: Site BJM is located on the top of Blackjack Peak, the third highest mountain on Catalina Island. North facing slopes of Blackjack are dominated by intact Island scrub oak (*Quercus pacifica*) Chaparral; south-facing slopes are dominated by intact Coastal Sage Scrub (note: areas mapped as Bare Ground in 2003 are largely recovering into Coastal Sage Scrub). A former silver mine pit is located above the Blackjack Campground access road on the north side of the peak. Black jack peak is visible from many locations on and around Catalina Island. The Trans-Catalina Trail passes just southeast of the peak, and the Airport Road, very popular for motor tours, just to the northwest.

Response to Comment 41: The study area description for Site BJM in Table 3.3-3 has been revised in accordance with this comment. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 42: Table 3.3.-3. The plant species list in this table for Blackjack Peak should be as follows (Note all edit species list in Section 4.0 Site Summary Forms. Species not listed here have no records near project site):

The following special status species have records within 1 mile of the project site (those with an "*" within 1000 feet, those with "*x" within 500 feet):

*Arctostaphylos catalinae**
Atriplex coulteri

Ceanothus megacarpus var. insularis
Crossosoma californicum

Crocanthemum greenei
*Dendromecon harfordii**
Dichondra occidentalis
Dissantheium californicum
Eriogonum giganteum var. giganteum
Eschscholzia ramosa
Galium catalinense ssp. catalinense
*Galium nuttallii ssp. insulare**
Gilia nevinii

Hordeum intercedens
Jepsonia malvifolia
Lepechinia fragrans
Lyonothamnus floribundus ssp. floribundus
Ophioglossum californicum
Quercus tomentella
Ribes viburnifolium
Scrophularia villosa
Solanum Wallacei

Response to Comment 42: We appreciate the updated plant occurrence data provided in the comment letter. A species list that includes these species has been added into Section 3.3.1.2. . This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 43: Site DPK is located on the top of Dakin Peak, a prominent high point above Avalon and Silver/Grand Canyons. The peak is dominated by Coastal Sage Scrub with areas of Grassland (*Bromus-Avena-Nasella*) and Island Scrub Oak (*Quercus pacifica*) Chaparral. Dakin peak is visible from many locations on and around Catalina Island. The Trans-Catalina Trail follows the Divide Road immediately northwest of the existing tower. The Divide Road is also a very popular road for interior jeep tours.

Response to Comment 43: The study area description for Site DPK in Table 3.3-3 has been revised in accordance with this comment. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 44: The following special status species have records within 1 mile of the project site (those with an "*" within 1000 feet, those with "**" within 500 feet):

Arctostaphylos catalinae
Atriplex coulteri
Ceanothus megacarpus var. insularis
Crossosoma californicum
Crocanthemum greenei
Dudleya virens ssp. insularis
*Eriogonum giganteum var. giganteum***
Eschscholzia ramosa

Hordeum intercedens
Jepsonia malvifolia
Lyonothamnus floribundus ssp. floribundus
Quercus tomentella
Ribes viburnifolium
Scrophularia villosa
Solanum Wallacei

Response to Comment 44: We appreciate the updated plant occurrence data provided in the comment letter. A species list that includes these species will be added into Section 3.3.1.2. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 45: Site TWR is located on the top of Tower Peak, a prominent high point above the Isthmus/Two Harbors area. The peak is dominated by Coastal Sage Scrub with areas of Grassland (*Bromus-Avena-Nasella*) and Island Scrub Oak (*Quercus pacifica*) Chaparral. Tower peak is visible from many locations on and around Catalina Island. The Trans-Catalina Trail follows the Banning Road immediately west of the existing tower.

Response to Comment 45: The study area description for Site TWR in Table 3.3-3 has been revised in accordance with this comment. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 46: The following special status species have records within 1 mile of the project site (those with an "*" within 1000 feet, those with "***" within 500 feet):

Atriplex coulteri

Constancea nevinii

Crossosoma californicum

Cryptantha wigginsii

Deinandra clementina

Dichondra occidentalis

Dissanthelium californicum (1400 feet west of site)

Dudleya virens ssp. hassei

Eriogonum giganteum var. giganteum

Eriogonum grande var. grande

Eschoscholia ramosa

Galium catalinense ssp. catalinense

Gambelia speciosa

Hordeum intercedens

Jepsonia malvifolia

Lyonothamnus floribundus ssp. floribundus

Pentachaeta lyonii (1400 feet northwest of site)

*Ribes viburnifolium***

Scrophularia villosa

Response to Comment 46: We appreciate the updated plant occurrence data provided in the comment letter. A species list that includes these species will be added into Section 3.3.1.2. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 47: Section 3.3.1.6. Local Policies and Ordinances. As discussed above for Sections 3.1.4 and 3.1.5, Catalina Island is part of unincorporated Los Angeles County and subject to land use ordinances of general applicability as well as Title 22, specific to Catalina Island.

Response to Comment 47: Refer to response to Comment #10. Additionally, the Authority believes that the proposed project and Mitigation Measures meet and/or exceed those measures outlined in Section 22.46.470 – Flora and Fauna. Relevant subsections of 22.6.470 include Section A, which requires a site plan with a 100 foot buffer of mapped vegetation prepared by a qualified botanist, impact analysis on native vegetation and wildlife, and suggested mitigation measures including transplanting vegetation or revegetating impacted areas; and Section B, preventing development that would remove or damage “rare or endangered plant species” as defined in Appendix G of the 1989 Santa Catalina Island Specific Plan; and G, development within SEAs shall be subject to Title 22 except for the exemption provisions contained in Section 22.56.215. The Authority believes that incorporation of the BIO MM 1, 2, 8, 3, 4, 5, 6, 8, 9, 10, 11, 17, 18, 19, 20, 23, and 24 at all sites on Santa Catalina Island will ensure adherence to Title 22 with regards to biological resources. Additionally, the project will be required to obtain a coastal development permit, and therefore the specific project will be analyzed for adherence to Title 22 and any other land use ordinances of general applicability.

Comment 48: Section 3.3.2.3. Local Regulatory Setting. As discussed above for Sections 3.1.4 and 3.1.5, Catalina Island is part of unincorporated Los Angeles County and subject to land use ordinances of general applicability as well as Title 22, specific to Catalina Island.

Response to Comment 48: Refer to responses to Comments #10 and #44 above.

Comment 49: Table 3.3-7. Species with Suitable Habitat within Study Areas. The following should be added to this table:

Burrowing Owl: BJM, DPK, TWR

California Mountain Kingsnake: BJM

Response to Comment 49: Table 3.3-7 has been revised to add the sites for these species. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 50: Section 3.3.4.1, Page 3-147 4th full paragraph and 3-148 first full paragraph. Burrowing owls are frequently observed throughout Catalina Island and should be listed for the BJM, DPK and TWR sites.

Response to Comment 50: The presence of burrowing owls at sites BJM, DPK, and TWR has been added to the text in the 4th full paragraph on page 3-147 and in the first paragraph on page 3-148. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 51: Section 3.3.4.1, Pages 3-154 to 3-155. Santa Catalina Island Fox. The following changes should be made:

1st Paragraph, 1st Sentence should state: "The Santa Catalina Island Fox is a habitat generalist and is found throughout Catalina Island in all natural habitats and areas of human habitation and development."

1st Paragraph, last sentence should state: "Young can be born any time from late February through late April..."

2nd Paragraph, should state: "The major threat to Catalina Island Foxes have been disease outbreaks, e.g. the canine distemper outbreak in the late 1990s that almost wiped out the population, and mortality from vehicle collisions or other dangers associated with human development, e.g. drowning in open containers of liquids, poisoning, becoming trapped in open excavations. Catalina Island Foxes should be expected at all three Catalina Island project sites and should definitely expected to investigate any changes to the sites during active construction, especially open holes and trenches, open containers of liquids and improperly enclosed solid or food wastes.,'

3rd Paragraph, Construction impacts should read: The noise and activities associated with construction of the proposed Project sites could result in temporary disturbance of fox. Therefore, construction cannot be initiated from late February the end July. Foraging foxes will investigate the construction site for new food sources and for cover in uncovered excavations, under equipment or stored materials. Discarded food and trash is effectively an attractive nuisance for foxes and can result in increased habituation and dependence on humans for food."

Response to Comment 51: Revisions were made to the 1st and 2nd paragraphs in accordance with the comment. These revisions do not result in any changes to the conclusions in the Draft EIR. Regarding the comment to the 3rd paragraph, since BIO MM 20 part b) includes the inspection for fox dens within the project area and within an additional 250 foot buffer, and that construction activities will be stopped and USFWS and CDFW contacted if a den is found, there is no additional need for a seasonal restriction. No change to text has been made.

Comment 52: BIO-MM-19(e). Add the following: "Any trenches, holes or other excavations that are not covered at the end of the work day, must be provided with a fox escape ramp."

Response to Comment 52: See response to Comment #17.

Comment 53: BIO-MM-20(a). Add the following: "Crews should be informed that there is absolutely no feeding of foxes allowed on Catalina Island."



Response to Comment 53: In compliance with BIO MM 20, Santa Catalina Island Fox Protection, construction crews will be informed on measures to avoid impacts to the fox, including no feeding. No change has been made to BIO MM 20.

Comment 54: Section 3.3.4.1, Pages 3-157 to 3-158. Small Animals, California Mountain Kingsnake, Coast Horned Lizard, San Diego Woodrat, Tehachapi Pocket Mouse, Townsend's Big-eared Bat and Western Mastiff Bat. The Conservancy has documentation of California Mountain Kingsnake at nearby Blackjack Campground. Townsend's Big-eared Bats breed on Catalina Island in caves and abandoned mines.

Response to Comment 54: Site BJM has been added for the discussion of California mountain kingsnake, and sites DPK and TWR have been added to the discussion of Townsend's big-eared bat in the paragraphs indicated on pages 3-157 and 3-158. These revisions do not result in any changes to the conclusions in the Draft EIR.

Comment 55: Section 3.3.4.1., Pages 3-158 and 3-159. BJM should be added to the list of sites at the top of page 3-158, in the fourth full paragraph of page 3-158, and in the first full paragraph on page 3-159.

Response to Comment 55: Site BJM has been added to the paragraphs indicated on pages 3-158 and 3-159. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 56: Section 3.3.4.1, Page 3-169. BIO-MM-23(b). Add the following: "For sites BJM, DPK and TWR, all construction vehicles and equipment shall be washed prior to being brought to Catalina Island and shall not enter Conservancy property until it is inspected by the Conservancy's invasive Plant Program Manager.

Response to Comment 56: See response to Comment #22.

Comment 57: Section 3.3.4.1, Page 3-207. See earlier comment regarding reference to Title 22 regulations.

Response to Comment 57: The authority acknowledges the project must adhere to Title 22, which will occur during the coastal plan permitting phase. See response to Comments #10 and #44.

Comment 58: Table 3.3-12. Special Status Species. The following species should be added to this table for Sites BJM, DPK and TWR:

- Burrowing Owl**
- Island Loggerhead Shrike**
- Catalina Island Quail**
- San Clemente Spotted Towhee**
- Hutton's Vireo**

In addition, the consultant should refer to Appendix G of the LCP for other species of special concern regulated under Title 22 of the LA County Code.

Response to Comment 58: The bird species listed in the comment have been added to the species list for sites BJM, DPK, and TWR in Table 3.3-12. These revisions do not result in any changes to the conclusions in the Draft EIR.

Thank you for providing the reference to the list of rare Catalina Island native plants, referred to in your comment as Appendix G of the LCP (http://planning.lacounty.gov/assets/upl/data/pd_santa-catalina-island-implementation.pdf). A species list that includes these species will be added into Section 3.3.1.2. Appendix G was reviewed and these plant species were also included in this revised list. This revision does not result in any changes to the conclusions in the Draft EIR.

In accordance with established mitigation measures, impacts to native vegetation will be minimized with the application of BIO MM 9 (page ES-40), and special status plants will be protected with the application of BIO MM 24 (page ES-47). A comprehensive inventory of plant species will be conducted at each project site where project activities would result in ground disturbance. Any special status plant species found on site will be identified for protection.

Comment 59: Section 3.4. Cultural Resources. Extensive prehistoric and historic cultural resources are present nearly everywhere on Catalina Island. Human habitation and use of the island extends at least to 8,000 BP and likely much earlier. Any excavation or drilling, even in previously developed areas, should expect to encounter cultural artifacts, human remains, middens, lithic scatters, and/or habitation sites. All three Catalina Island sites have mapped cultural locations in or near the project location (see attached maps). No excavation or soil disturbance should be undertaken without an archeological monitor present. All of the tables and text in Section 3.4 should be edited to include BJM, DPK and TWR as actual or likely locations for cultural resources to be present.

Response to Comment 59: Please note that the maps that were attached to the comment letter have been redacted. Protocols for the identification of prehistoric and historic archaeological resources included records searches; a review of site records, site maps, and archaeological survey reports; GIS mapping; and field surveys of all Project sites, including BJM, DPK, and TWR. Although Santa Catalina Island is known to have a long history of human habitation, based on the identification protocols, there were no prehistoric or historic archaeological sites, features, or other remains that would be impacted by Project activities identified within the proposed ground disturbing areas at sites BJM, DPK, or TWR. Within a 0.5-mile radius of Site BJM, one prehistoric site was noted approximately 0.21 mile to the north. Within a 0.5-mile radius of Site DPK, one prehistoric site (a single artifact) was noted approximately 0.23 mile to the southwest; and one historic site (two concrete water line markers) was noted approximately 0.12 mile to the northeast. No prehistoric or historic archaeological remains were found within 0.5-mile radius of Site TWR. None of the identified archeological remains were recorded as being historical resources as defined in California PRC section 21084.1 and CEQA Guidelines Section 15064.5(a) – i.e., listed in, or eligible for listing in the California Register of Historical Resources.



However, to address the concerns of the Conservancy, an archaeological monitor will be present during all ground-disturbing activities at sites BJM, DPK, and TWR.

These revisions do not result in any changes to the conclusions in the Draft EIR.

Comment 60: Section 4.0. Site Summary Forms. -- All site summary forms for BJM, DPK and TWR should be thoroughly edited to reflect changes discussed above.

Response to Comment 60: Site summary forms for BJM, DPK and TWR have been edited for consistency with the revisions described in previous responses.



Comment Letter Public 1

February 19, 2016

To whom it may concern,

1 I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.


2 We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.


3 There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we “know”. But I would venture to guess, there is much more that we don’t know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn’t that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

4 In addition, there is talk about placing a 1,500 gallon diesel storage tank to power a new 85 KW generator to power the antennas in case of a power failure. This is a bad idea. On every home sale, a natural hazards report is released and underground storage tanks and leaks could impact the values and desirability of nearby homes. Signal Hill is on an earthquake fault line and we do not need thousands of gallons of fuel placed buried in our soil. The generator may also create a lot of noise that would be a nuisance to neighboring homes.

5 If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we’d have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

 ALEX ARMENDARIZ / DANIEL BAYER
ARMENDARIZ - BAYER HOUSEHOLD

RECEIVED
FEB 25 2016
LA-RICS 

2361 STANLEY Signal Hill CA 90755



Responses to Comment Letter Public 1

The Authority appreciates your comments on the Draft EIR dated February 19, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

Response to Comment 1: Your opposition to the use of Site SGH is noted.

Comment 2: We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

Response to Comment 2: The total number of potential locations considered for the LMR project is 94. Information on the numbers of sites that was provided during public meetings and community outreach meetings is consistent with the information in the Draft EIR. While each LMR site included in the Draft EIR is unique, other sites analyzed in the Draft EIR, such as SDW and WAD, are similar to site SGH in that they are located in residential areas with residences adjacent. Regarding the comment that there was a lack of public disclosure, the Draft EIR was circulated for a 45 day public review period. The Draft EIR explains that the Authority is proposing installation of up to 40 whip and up to 9 microwave antennas on an existing 160-foot tower, which would be extended to 180 feet, with an additional 15 foot lighting rod. (Draft EIR, pp. 2-32, 4-1487.) Regarding the comment on “radiation fields,” please see response to comment 3, below.

Comment 3: There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

Response to Comment 3: As described in Section 5.3 of the Draft EIR, the Authority will manage radiofrequency (RF) electromagnetic energy (EME) radiation in accordance with applicable guidance

found at the Federal Communication Commission’s Office of Engineering and Technology (OET) Bulletin 65. This will include desktop analysis of RF exposures inclusive of all equipment at the site (including new LMR equipment) prior to construction and confirmatory sampling of RF exposures upon completion of construction to ensure exposures are within regulatory requirements for workers and the public. The assessments from the different health and safety organizations seem to be different on how they classify RF EME field. See the below FCC web link: <https://www.fcc.gov/engineering-technology/electromagnetic-compatibility-division/radio-frequency-safety/general/rf>. However RF-EME is classified by the different health and safety organizations, per information on <https://www.fcc.gov/general/radio-frequency-safety-0>, “...the FCC has continuously monitored research and conferred with experts in this field, and is confident in its RF exposure guidelines and the soundness of the basis for its rules”, the FCC guideline is still current and valid. It is unclear whether any organization besides the FCC has established new safety guidelines, nor is there any evidence that RF exposure is harmful at the levels that would occur with the proposed project.

Comment 4: In addition, there is talk about placing a 1,500 gallon diesel storage tank to power a new 85 KW generator to power the antennas in case of a power failure. This is a bad idea. On every home sale, a natural hazards report is released and underground storage tanks and leaks could impact the values and desirability of nearby homes. Signal Hill is on an earthquake fault line and we do not need thousands of gallons of fuel place buried in our soil. The generator may also create a lot of noise that would be a nuisance to neighboring homes.

Response to Comment 4: The proposed 1,500 gallon diesel storage tank would be an aboveground, double-walled belly tank on the 85-KW diesel generator, not a buried underground storage tank. The diesel storage tank would be installed in accordance with all federal, state and local regulations, and the California Fire Code as discussed in Section 3.7 of the Draft EIR, with specific detail for Site SGH at pages 4-1508 and 4-1509. The regulations are promulgated to ensure diesel storage tanks are safely constructed and include secondary spill control containment requirements to prevent leaks into the environment. Also, for facilities that have a fuel tank greater than 660 gallons or fuel storage greater than 1,320 gallons, a Spill Prevention, Control and Countermeasures Plan (SPCC Plan) will be prepared and kept on site. Management of fuels will be conducted in accordance with all applicable regulations.

Signal Hill is bounded by a fault system. According to the California Geologic Special Studies Zones, Long Beach Quadrangle, the active fault trace is located near the bottom of Signal Hill, approximately 1/8 mile from the site, but the site is not within an Alquist-Priolo Fault Zone. However significant shaking would occur at the site should an earthquake rupture along the active fault trace. A discussion of geologic hazards at the site is provided on page 4-1504 of the Draft EIR. The storage tank would be installed in compliance with the local building codes to minimize seismic hazards (page 3-349 of DEIR).

Noise levels associated with the period operation of the diesel generator, estimated to be one hour per month as part of routine maintenance, and as required in the event of power outage. Section 4, page 4-1518 of the Draft EIR provides a detailed analysis of noise from the period use of the generator. The Draft EIR concludes that “resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet.



Receivers are located 25 feet from this project site and with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding this occasional operational noise to ambient conditions would fall far below the daytime (90 dBA) or nighttime (80 dBA) thresholds identified by the Federal Transit Authority used in the analysis. The more continuous noise associated with the air conditioning unit used to regulate temperature in the equipment shelters would fall within background noise levels; therefore, impacts from operational noise would be less than significant.”

Comment 5: If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Response to Comment 5: As lead agency and proponent of the project, the Authority has and will continue to perform outreach with the public regarding LMR project implementation. The Authority is fully accountable for the decisions being made regarding the implementation of LMR Project. The Authority’s Board will consider the Draft EIR and Final EIR, inclusive of your comments, prior to making a decision on the proposed project. The LMR system would provide emergency responders with an improved communications system that will enable efficient and coordinated response to incidents and emergencies that is currently not possible in Los Angeles County. The improved communications could reduce response times and ultimately save lives. The LMR system would support faster, better-coordinated, large-scale multi-agency response to emergencies such as terrorist attacks, earthquakes, civil disturbance, wildfire or other disasters, improving overall system capacity and coverage for first and second responders region-wide. The LMR project would enhance safety and emergency response for 10 million Los Angeles County residents and the over 40 million Los Angeles County tourists.

The DEIR fully discloses the project and potential project impacts based on the best available information at the time it was released for public review. The form letter that you note in your comment was likely the Notice of Availability (NOA). The NOA was provided to you in accordance with Section 21092 of the California Public Resources Code. The NOA included: Project Description and Location; Significant Anticipated Environmental Effects; Hazardous Waste Sites; Document Availability (including both the Website for electronic review and 16 locations for where hard copies of the document could be reviewed) and Public Review and Meetings (which included location and time for six public hearings and both e-mail and physical address for submitting public comments). A total of six public meetings were held for the Draft EIR: one in each of the five districts of the Los Angeles County Board of Supervisors, plus one in Avalon on Catalina Island. The nearest location of a public meeting for the Draft EIR to the site in Signal Hill was approximately 12 miles from the site at Peck Park Community Center Auditorium at 560 N. Western Ave. in San Pedro. The project spans all of the Los Angeles County area, and the Authority selected locations that would provide opportunities for people all across the county to attend



a public meeting if desired. The format and information provided at each of the public meetings was the same.

The Draft EIR included all pertinent details of the proposed project at Site SGH. As described in the Draft EIR on page 2-32, Site SGH is an “Existing 160’ tower to be extended to 180’.” As described in more detail beginning at page 4-1487, Site SGH describes installation of up to 40 whip and up to 9 microwave antennas on existing 160-foot lattice tower to be extended to 180 feet tall, with additional up to 15-foot lightning rod.



Comment Letter Public 2

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

In addition, there is talk about placing a 1,500 gallon diesel storage tank to power a new 85 KW generator to power the antennas in case of a power failure. This is a bad idea. On every home sale, a natural hazards report is released and underground storage tanks and leaks could impact the values and desirability of nearby homes. Signal Hill is on an earthquake fault line and we do not need thousands of gallons of fuel place buried in our soil. The generator may also create a lot of noise that would be a nuisance to neighboring homes.

If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

Willie B Armstead
WILLIE B ARMSTEAD

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FEB 25 2016

LA-RICS

2525 EASTWIND Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 3

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

S. C. Brainerd
2312 PROMONTORY DR.
SIGNAL HILL, CA - 90755

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FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 4

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

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Sincerely,

[Handwritten signature]
RAQUEL CALDERA

RECEIVED

FEB 25 2016

LA-RICS

2301 STANLEY Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 5

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

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Sincerely,

Corey Clements

RECEIVED

FEB 25 2016

LA-RICS

2541 EAST WIND Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 6

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

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Sincerely,

2301 Promontory Drive
Signal Hill, CA 90755

Woody Chen



Please see response to comment letter Public 1

Comment Letter Public 7

February 19, 2016

To whom it may concern,

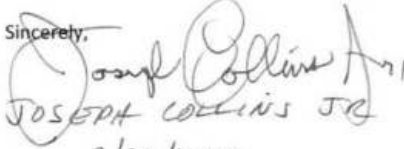
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Sincerely,

JOSEPH COLLINS JR
2/22/2016
2239 STARLIGHT LANE
SIGNAL HILL, CA 90757

Please see response to comment letter Public 1



Comment Letter Public 8

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Janet Cree
2337 Promontory Dr.
Signal Hills, CA. 90755

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FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 9

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.


We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,


Leslie Dew
2380 Stanley Ave



Please see response to comment letter Public 1

Comment Letter Public 10

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

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Sincerely,

Walter H. Ferrell
Walter H. Ferrell
2329 Promontory Dr
Signal Hill, Ca 90755
562-961-9155

Please see response to comment letter Public 1



Comment Letter Public 11

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

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Sincerely,



Jason Ferrera-Garcia

2501 EASTWIND Signal Hill CA 90755

Please see response to comment letter Public 1

Comment Letter Public 12

February 19, 2016

To whom it may concern,

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If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,


RECEIVED
FEB 25 2016
LA-RICS
NADY Hebish
2209 West Windway
Signal Hill CA 90755
(562) 889-2109

Please see response to comment letter Public 1



Comment Letter Public 13

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

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Sincerely,

Patrick Heeb
PATRICK HEEB

RECEIVED

FEB 25 2016

LA-RICS

2599 EASTWIND Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 14

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Reid Jones

RECEIVED
FEB 25 2016
LA-RICS

2509 EASTWIND Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 15

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

IKONITA S JOY MD 2/22/2016 2239 STARLIGHT LANE
SIGNAL HILL, CA 90755

RECEIVED

FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 16

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Diane Kert
2357 Promontory Dr
Signal Hill 90755

RECEIVED

FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 17

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Jonathan Kent
2357 Promontory
Signal Hill 90755

RECEIVED
FEB 25 2016
JAK
LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 18

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

SOPHANY KHEM

2210 WESTWIND WAY
SIGNAL HILL, CA 90755

RECEIVED

FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 19

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Sabri Lamee
2349 Promontory Dr. Signal Hill, CA 90755

RECEIVED
FEB 25 2016
LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 20

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

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Sincerely,

2561 Hillcrest ST Signal Hill CA 90755

RECEIVED

FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 21

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

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Sincerely,

Grant Laver
2293 Westwind Way

RECEIVED

FEB 26 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 22

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

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Sincerely,

Signed: 

Dated: FEB 23 2016

By: Tony Lim

Address: 2273 Westwind Way
Signal Hill, CA 90755

RECEIVED
FEB 26 2016
LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 23

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

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Sincerely,

Michael D. Loomis
MICHAEL D. LOOMIS

RECEIVED
FEB 25 2016
LA-RICS

2331 STANLEY signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 24

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

In addition, there is talk about placing a 1,500 gallon diesel storage tank to power a new 85 KW generator to power the antennas in case of a power failure. This is a bad idea. On every home sale, a natural hazards report is released and underground storage tanks and leaks could impact the values and desirability of nearby homes. Signal Hill is on an earthquake fault line and we do not need thousands of gallons of fuel place buried in our soil. The generator may also create a lot of noise that would be a nuisance to neighboring homes.

If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

A handwritten signature in black ink that reads "Jan Lu" in a cursive style.

RECEIVED
FEB 25 2016
LA-RICS JA

2320 STANLEY Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 25

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Quinn McCutchan
JMcCutchan
Jame Quintan
JQuin

RECEIVED
FEB 25 2016
LA-RICS *JJA*

2330 Stanley Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 26

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.


We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,


Catherine Olweg
2365 Promontory Drive
Signal Hill CA 90755

RECEIVED

FEB 25 2016
LA-RICS *fid*

Please see response to comment letter Public 1



Comment Letter Public 27

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Melissa Rosenthal / Melissa Rosen thal
2245 Westwind Way
Signal Hill, CA 90755

RECEIVED
FEB 25 2016
LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 28

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

X *Jawad SHAHID*
2217 West Windway
Signal Hill CA 90755
(562) 494-2587



Please see response to comment letter Public 1



Comment Letter Public 29

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Lynda Simmons
2255 Westwind Way
Signal Hill, Ca 90755

RECEIVED

FEB 25 2016

JAT
LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 30

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters, and ~~THE~~ ANTENNAS

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Samuel L. Simmons

2255 WESTWIND WAY

SIGNAL HILL, CALIF 90755

RECEIVED

FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 31

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,


Martha A. Neese

RECEIVED

FEB 25 2016

JAA LA-RICS

2533 EASTWIND Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 32

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Jose F. Torreblanca
2277 Starlight Ln
Signal Hill CA 90755

Kira Torreblanca



Please see response to comment letter Public 1



Comment Letter Public 33

In reference to proposed Signal Hill site

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Bonnie Vega
2325 Promontory Dr
SH CA 90255

RECEIVED
FEB 26 2016
LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 34

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Albert V. Warot
Jwarot

23 05 Promontory Dr
Signal Hill Ca 90755

RECEIVED
FFR 26 2016
LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 35

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

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Sincerely,

A handwritten signature in blue ink that reads "Maria Cavallo".

RECEIVED

FEB 25 2016

LA-RICS

2489 EASTWIND Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 36

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

In addition, there is talk about placing a 1,500 gallon diesel storage tank to power a new 85 KW generator to power the antennas in case of a power failure. This is a bad idea. On every home sale, a natural hazards report is released and underground storage tanks and leaks could impact the values and desirability of nearby homes. Signal Hill is on an earthquake fault line and we do not need thousands of gallons of fuel place buried in our soil. The generator may also create a lot of noise that would be a nuisance to neighboring homes.

If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,


John A. Izoratti

RECEIVED

FEB 25 2016

LA-RICS 

2499 EAST WIND Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 37

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

RECEIVED

FEB 25 2016

LA-RICS

2501 Hillcrest Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 38

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.


We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,


2511 Hillcrest St.
Signal Hills CA 90755

RECEIVED

FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 39

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Jim Kelly
2521 Hillcrest Signal Hill, CA 90755

RECEIVED

FEB 25 2016

LA-RICS *JA*

Please see response to comment letter Public 1



Comment Letter Public 40

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

RECEIVED
FEB 25 2016
LA-RICS *[initials]*

2530 Hillcrest ST Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 41

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

2541 Hillcrest + Signal Hill, CA 90755

RECEIVED
FEB 25 2016
LA-RICS 

Please see response to comment letter Public 1



Comment Letter Public 42

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

2580 Hillcrest St Signal Hill, CA 90755

RECEIVED

FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 43

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

2591 Hillcrest St Signal Hill CA 90755
Paula Roman 2/21/15

RECEIVED
FEB 25 2016
LA-RICS *JAA*

Please see response to comment letter Public 1



Comment Letter Public 44

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Gilbert B. Guey
2013 Promontory Dr.
Signal Hill, Ca., 90755

RECEIVED

FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 45

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Stacie
2304 Promontory Drive
Signal Hill

RECEIVED
FEB 25 2016
LA-RICS *[Signature]*

Please see response to comment letter Public 1



Comment Letter Public 46

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,


2313 Promontory Dr. SH CA 90755

RECEIVED

FEB 25 2016

LA-RICS 

Please see response to comment letter Public 1



Comment Letter Public 47

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

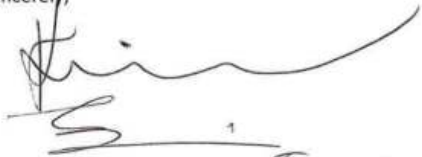
We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,


2326 Promontory Drive
Signal Hill, CA 90755

RECEIVED
FEB 26 2016
LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 48

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

In addition, there is talk about placing a 1,500 gallon diesel storage tank to power a new 85 KW generator to power the antennas in case of a power failure. This is a bad idea. On every home sale, a natural hazards report is released and underground storage tanks and leaks could impact the values and desirability of nearby homes. Signal Hill is on an earthquake fault line and we do not need thousands of gallons of fuel place buried in our soil. The generator may also create a lot of noise that would be a nuisance to neighboring homes.

If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

A handwritten signature in blue ink, appearing to be "D. H.", is written over the word "Sincerely".

2377 Promontory Dr.
Signal Hill, CA 90755

RECEIVED

FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 49

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

In addition, there is talk about placing a 1,500 gallon diesel storage tank to power a new 85 KW generator to power the antennas in case of a power failure. This is a bad idea. On every home sale, a natural hazards report is released and underground storage tanks and leaks could impact the values and desirability of nearby homes. Signal Hill is on an earthquake fault line and we do not need thousands of gallons of fuel placed buried in our soil. The generator may also create a lot of noise that would be a nuisance to neighboring homes.

If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

2377 PROMONTORY DRIVE.
Signal Hill CA 90755.

Tea Chou
Yajima Chang
[Handwritten signature]

Please see response to comment letter Public 1



Comment Letter Public 50

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

In addition, there is talk about placing a 1,500 gallon diesel storage tank to power a new 85 KW generator to power the antennas in case of a power failure. This is a bad idea. On every home sale, a natural hazards report is released and underground storage tanks and leaks could impact the values and desirability of nearby homes. Signal Hill is on an earthquake fault line and we do not need thousands of gallons of fuel place buried in our soil. The generator may also create a lot of noise that would be a nuisance to neighboring homes.

If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Adk", is written over the "Sincerely," text.

RECEIVED

FEB 25 2016

LA-RICS

Handwritten initials "JA" in blue ink are written over the "LA-RICS" stamp.

2341 STANLEY Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 51

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

In addition, there is talk about placing a 1,500 gallon diesel storage tank to power a new 85 KW generator to power the antennas in case of a power failure. This is a bad idea. On every home sale, a natural hazards report is released and underground storage tanks and leaks could impact the values and desirability of nearby homes. Signal Hill is on an earthquake fault line and we do not need thousands of gallons of fuel place buried in our soil. The generator may also create a lot of noise that would be a nuisance to neighboring homes.

If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

Arnel Jaimes
2229 Westwind way
Signal Hill, CA 90755

RECEIVED

FEB 25 2016

LA-RICS *JA*

Please see response to comment letter Public 1



Comment Letter Public 52

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.


We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

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If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely


2240 Westwind Way
Signal Hill, CA 90755

RECEIVED
FEB 25 2016
LA-RICS 

Please see response to comment letter Public 1.



Comment Letter Public 53

February 23, 2016

To whom it may concern,

1 | I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

2 | We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas.

Sincerely,

Shan Fernando

2311 Stanley Ave, Signal Hill, CA 90755

Responses to Comment Letter Public 53

The Authority appreciates your comments on the Draft EIR dated February 23, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

Response to Comment 1: The commenter's opposition to the use of Site SGH is noted.

Comment 2: We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas.

Response to Comment 2: While each LMR site included in the Draft EIR is unique, other sites analyzed in the Draft EIR, such as sites SDW and WAD, are similar to Site SGH in that they are located in residential areas with residences adjacent. Regarding the comment that there was a lack of public disclosure, the Draft EIR was circulated for a 45 day public review period. The Draft EIR explains that the Authority is proposing installation of up to 40 whip and up to 9 microwave antennas on an existing 160-foot tower, which would be extended to 180 feet, with an additional 15 foot lighting rod. (Draft EIR, pp. 2-32, 4-1487.)



Comment Letter Public 54

February 12, 2016

Regarding Proposed LMR Site
in Signal Hill.

To whom it may concern,

1 | We are outraged at the proposal to extend the radio antenna tower by an additional 20 feet and install a new 15 foot lighting rod on top of it. There are hundreds of homes and condos nearby that would be adversely affected. We have children growing up in the neighborhood and we do not want to be bombarded by additional radiation.

2 | As homeowners, all of us signed disclosures acknowledging the existence of the radio tower. What was never disclosed to any of us was that the radio tower could grow by 35 feet. That is the size of a school bus planted vertically on top of the antenna. That is a big deal. That is unacceptable and that is something you would not allow in your backyard. From my understanding, it would be illegal to build the antenna after the homes were already here, so I do not see how increasing the size and scope of the existing antenna is legal.

3 | If every home went down in value by \$25,000 as a result of the antenna tower's giant growth, we are talking about tens of millions of dollars of damages to the local real estate market. Not only does increasing the size of the antenna impact home values, it does additional damage to property values because now homeowners would have to disclose that the antenna was increased in size by 35 feet and it could happen again in the future. The precedent of growing the antenna by leaps and bounds at any time would further depreciate property values for hundreds of property owners.

4 | Notice of the initiative was sent out to the neighbors; however, nowhere in the notice does it mention that the antenna will grow by 35 feet. That's disingenuous and obfuscating the truth. It is also inappropriate and manipulative to hold six public meetings regarding the impact of the antenna and not one of these public meetings held by the LA-RICS is taking place near the proposed site, where the health of the families will be affected. We would literally have to get on a boat to get to the February 1st meeting on Catalina Island.

5 | If this proposal passes, I will personally send out thousands of postcards to the nearby residents to hold the decision makers accountable for endangering our health and damaging our property values.

Sincerely,

Matthew Simmons
(562) 546-2277
2245 Westwind Way
Signal Hill, Ca 90755

RECEIVED

FEB 25 2016

LA-RICS

Responses to Comment Letter Public 54

The Authority appreciates your comments on the Draft EIR dated February 12, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: We are outraged at the proposal to extend the radio antenna tower by an additional 20 feet and install a new 15 foot lighting rod on top of it. There are hundreds of homes and condos nearby that would be adversely affected. We have children growing up in the neighborhood and we do not want to be bombarded by additional radiation.

Response to Comment 1: The commenter's concerns regarding increasing the height of the existing tower at Site SGH are noted and will be reviewed by the LA-RICS Joint Powers Authority Board of Directors prior to their consideration of the project, and made a part of the administrative record for this project. The management of radiofrequency exposures at the site would be conducted, as noted in the Draft EIR at Section 5.3 (page 5-8), in accordance with applicable regulations and guidelines.

Comment 2: As homeowners, all of us signed disclosures acknowledging the existence of the radio tower. What was never disclosed to any of us was that the radio tower could grow by 35 feet. That is the size of a school bus planted vertically on top of the antenna. That is a big deal. That is unacceptable and that is something you would not allow in your backyard. From my understanding, it would be illegal to build the antenna after the homes were already here, so I do not see how increasing the size and scope of the existing antenna is legal.

Response to Comment 2: The Authority's proposal for Site SGH is to extend the existing 160-foot lattice tower by 20 feet to 180 feet. A 15-foot lightning rod would be installed on the top of the extended tower. The tower would not be extended by 35 feet. The commenter's opposition to the proposed project at Site SGH is noted. The commenter's comment regarding the legality of building antenna is not an environmental issue that requires a response pursuant to CEQA Guidelines section 15088 and is outside the scope of the EIR.

Comment 3: If every home went down in value by \$25,000 as a result of the antenna tower's giant growth, we are talking about tens of millions of dollars of damages to the local real estate market. Not only does increasing the size of the antenna impact home values, it does additional damage to property values because now homeowners would have to disclose that the antenna was increased in size by 35 feet and it could happen again in the future. The precedent of growing the antenna by leaps and bounds at any time would further depreciate property values for hundreds of property owners.

Response to Comment 3: CEQA does not require social or economic impacts to be treated as significant effects on the environment (CEQA Guidelines §§ 15064(e), 15382). Additionally, there is no evidence that the proposed project would have any impact on property values near Site SGH, or that any potential change in property value would result in a physical impact on the environment.



Comment 4: Notice of the initiative was sent out to the neighbors; however, nowhere in the notice does it mention that the antenna will grow by 35 feet. That's disingenuous and obfuscating the truth. It is also inappropriate and manipulative to hold six public meetings regarding the impact of the antenna and not one of these public meetings held by the LA-RICS is taking place near the proposed site, where the health of the families will be affected. We would literally have to get on a boat to get to the February 1st meeting on Catalina Island.

Response to Comment 4: As lead agency and proponent of the project, the Authority has and will continue to perform outreach with the public regarding LMR project implementation. The Authority is fully accountable for the decisions being made regarding the implementation of LMR Project. The Authority's Board will consider the Draft EIR and Final EIR, inclusive of comments received, prior to making a decision on the proposed project. The LMR system would provide emergency responders with an improved communications system that will enable efficient and coordinated response to incidents and emergencies that is currently not possible in Los Angeles County. The improved communications could reduce response times and ultimately save lives. The LMR system would support faster, better-coordinated, large-scale multi-agency response to emergencies such as terrorist attacks, earthquakes, civil disturbance, wildfire or other disasters, improving overall system capacity and coverage for first and second responders region-wide. The LMR project would enhance safety and emergency response for 10 million Los Angeles County residents and the over 40 million Los Angeles County tourists.

The Draft EIR fully discloses the project and potential project impacts based on the best available information at the time it was released for public review. The notice identified in the comment was likely the Notice of Availability (NOA). The NOA was provided to you in accordance with Section 21092 of the California Public Resources Code. The NOA included: Project Description and Location; Significant Anticipated Environmental Effects; Hazardous Waste Sites; Document Availability (including both the Website for electronic review and 16 locations for where hard copies of the document could be reviewed) and Public Review and Meetings (which included location and time for 6 public hearings and both e-mail and physical address for submitting public comments). A total of six public meetings were held for the Draft EIR: one in each of the five districts of the Los Angeles County Board of Supervisors, plus one in Avalon on Santa Catalina Island. The nearest location of a public meeting for the Draft EIR to the site in Signal Hill was approximately 12 miles from the site at Peck Park Community Center Auditorium at 560 N. Western Ave. in San Pedro. The project spans all of the Los Angeles County area and the Authority selected locations that would provide opportunities for people all across the county to attend a public meeting if desired. The format and information provided at each of the public meetings was the same.

The Draft EIR included all pertinent details of the proposed project at Site SGH. As described in the Draft EIR on page 2-32, Site SGH is an "Existing 160' tower to be extended to 180'". As described in more detail beginning at page 4-1487, Site SGH describes installation of up to 40 whip and up to 9 microwave antennas on existing 160 foot lattice tower to be extended to 180 feet tall, with additional up to 15 foot lightning rod.



Comment 5: If this proposal passes, I will personally send out thousands of postcards to the nearby residents to hold the decision makers accountable for endangering our health and damaging our property values.

Response to Comment 5. The commenter’s concerns are noted.

Comment Letter Public 55

From: Ebrahim Yedidsion
Sent: Thursday, February 25, 2016 11:07:39 AM (UTC-08:00) Pacific Time (US & Canada)
To: DraftEIR Hotline
Subject: LMR Site in 409 Walker Drive, Beverly Hills, Ca. 90210

- 1 | We hereby oppose to installation of additional Towers at this location due to known health risk hazard to residents who live close to such sites .
- 2 | There are already TWO (2) communication towers at this address and adding another, will surely intensify the risk and hazard to health by factor of 75%. Why not share and use the existing towers?
- 3 | The studies made by various countries and independent institution show very high health risk to close residence even at radiations of 100 times less that what is being proposed. (please refer to attachments).
- 4 | Who and which organization is going to accept liability and be responsible for the short and long term well being of the immediate residents? Have any one of the studies presented in this (EIR) been done by independent contractors with no connection what so ever to beneficiaries?
- 5 | Has there been any study to evaluate the effect of these towers on the value of the properties close to this specific site?? Who or which organization is going to compensate the property owners for such losses.

Awaiting for your formal response.

Respectfully,

Abe Yedidsion
1890 Loma Vista Drive
Beverly Hills, Ca 90210

Cell: (310)938-9933

References:

<http://chej.org/wp-content/uploads/Cell-Phone-Towers-PUB-1291.pdf>

<http://healthycanadians.gc.ca/security-securite/radiation/devices-dispositifs/consumer-consommateur/cell-eng.php>

<https://www.fcc.gov/engineering-technology/electromagnetic-compatibility-division/radio-frequency-safety/faq/ef-safety#Q5>

<http://www.geoengineeringwatch.org/health-effects-from-cell-phone-tower-radiation/>

<http://nstarzone.com/CELL.html>

<http://www.saferemr.com/2015/04/cell-tower-health-effects.html>

Responses to Comment Letter Public 55

The Authority appreciates your comments on the Draft EIR dated February 25, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: We hereby oppose to installation of additional Towers at this location due to known health risk hazard to residents who live close to such sites.

Response to Comment 1: The Authority acknowledges the commenter’s opposition to the installation of additional towers at the proposed Walker Drive site (WAD). As the Draft EIR explains on page 4-1874, the proposed project would utilize an existing monopole at site WAD, which would be increased from its current height of 120 feet to 140 feet. No new tower(s) is proposed for this location.

Comment 2: There are already TWO (2) communication towers at this address and adding another, will surely intensify the risk and hazard to health by factor of 75%. Why not share and use the existing towers?

Response to Comment 2: The commenter is correct regarding the number of existing towers (a lattice tower and monopole currently exist at Site WAD). The Draft EIR includes a site-specific analysis of the potential for exposure to hazardous conditions at Site WAD on pages 4-1895 through 4-1898. The Draft EIR also includes a discussion of Radio Frequency (RF) exposures in Section 5.3. As explained there, RF exposures from operation of each site are not permitted to exceed the maximum permissible exposure (MPE) standards established by the FCC as set forth in 47 CFR Sections 1.1307 and 1.1310, and expressed in FCC OET Bulletin 65. To comply with this legal standard at each operational site, the Authority will require its contractor to perform an RF emission safety study prior to construction that will model the RF emission level from all equipment on site and demonstrate that it complies with the FCC guidelines and regulations on MPE for the General Public / Uncontrolled and for the Occupational / Controlled groups per the FCC’s OET Bulletin 65. After installation of the proposed Project site equipment and prior to operation, the contractor will conduct field measurements to confirm RF emission levels are in compliance and will identify, resolve, and correct any noncompliance (including posting appropriate signage) until compliance can be demonstrated. Radiofrequency exposures at proposed LMR project sites would be managed in accordance with applicable regulations contained in OET Bulletin 65.

There is no evidence that the proposed project would intensify health hazards. Additionally, as discussed above, the proposed project would use an existing tower at Site WAD, as the commenter suggests.

Comment 3: The studies made by various countries and independent institution show very high health risk to close residence even at radiations of 100 times less that what is being proposed. (please refer to attachments.)



Response to Comment 3: The Authority has reviewed the referenced six web sites. The information and related references do not contain any evidence that would compel the Authority to revise the discussion of radio frequency emissions in the Draft EIR. The Authority will continue to follow the underlying guidance provided by the FCC (i.e., FCC OET Bulletin 65) as the accepted and authoritative guidance used for management of RF-EME, as documented in the Draft EIR. No information applicable to the analysis in the Draft EIR that would result in a change to the conclusions of the Draft EIR was identified.

Comment 4: Who and which organization is going to accept liability and be responsible for the short and long term wellbeing of the immediate residents? Have any one of the studies presented in this (EIR) been done by independent contractors with no connection what so ever to beneficiaries?

Response to Comment 4: The EIR, and all reports prepared in connection with the EIR, reflect the independent judgment of the Authority and have been prepared in compliance with CEQA.

Comment 5: Has there been any study to evaluate the effect of these towers on the value of the properties close to this specific site?? Who or which organization is going to compensate the property owners for such losses?

Response to Comment 5: CEQA does not require social or economic impacts to be treated as significant effects on the environment. (CEQA Guidelines §§ 15064(e), 15382.) Additionally, there is no evidence that the proposed project would have any impact on property values near Site WAD, or that any potential change in property value would result in a physical impact on the environment.



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4.0 Revisions to the Draft EIR

This chapter presents specific changes to the Draft EIR made in response to written comments received from the public and/or reviewing agencies. Text in blue underline (i.e., blue underline) represents language that has been added to the EIR; text in red strikeout (i.e., ~~red strikeout~~) has been deleted from the EIR.



Page ES-36; Table ES-2: Environmental Impacts and Mitigation Measures

The text of BIO MM 1, BIO MM 2, BIO MM 5, BIO MM12, BIO MM 14, CUL MM 2, CUL MM 5 through CUL MM 7, GEO MM 1, HAZ MM 1 through HAZ MM 3, NOI MM 2, TRANS MM 1, TRANS MM 2, and UTL MM 1 in Table ES-2 is hereby amended as follows:

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
Biological Resources	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	BIO MM 1 Conservation <u>Mitigation</u> . Monitoring and Reporting Plan: Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement a mitigation monitoring and reporting plan (MMRP) for the proposed Project. The MMRP would serve to organize environmental compliance requirements identified in best management practices, mitigation measures, permit requirements, real property agreement conditions, <u>coordination with the land management agency(s)</u> , and other applicable sources. The MMRP shall contain an organization chart and communication plan for environmental compliance as it relates to the proposed Project.	AGH, AJT, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 2 Worker Environmental Awareness Program: Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement, <u>including coordination with the respective land management agency</u>, a Worker Environmental Awareness Program (WEAP) for the proposed Project. This mitigation measure would serve to institute and formalize an education program to increase awareness of environmental resources and measures and rules that are in place to help minimize impacts to those resources.</p> <ul style="list-style-type: none"> a) A WEAP shall be developed and shall be required for all construction employees prior to placement of Project equipment, construction, or any ground-disturbing activities at the proposed Project site. Training of additional workers, contractors, and visitors shall be provided, as needed. b) The WEAP is to inform on-site workers of the possible presence of special status species, the measures to be taken to protect these species, and the importance of minimizing impacts to the natural environment through the protection of native vegetation, adhering to required buffers and protection zones, staying on existing roads, and implementing best management practices, that include containment of any spills, disposal of trash, and management of runoff and sediment transport. c) To assure long-term implementation of mitigation measures, an information sheet listing potential sensitive species and what to do if any are encountered shall be prepared, distributed to workers, and posted on site. 	AGH, AJT, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 5 Hazardous Materials Management:</p> <ul style="list-style-type: none"> a) A toxic substance management and spill response plan shall be prepared by the contractor for review and approval by the Authority. c) Hazardous materials shall be contained; spills shall be prevented; and any spills at the Project site or along access roads shall be contained and cleaned up immediately. d) All construction vehicles are required to carry at least one spill response kit. d) Any spills shall be accounted for in reports prepared by the biological/environmental monitor. 	BJM, BUR, BUR1, BUR2, BUR3, DPK, FRP, GMT, JOP, JPK, JPK2, LACFCP09, LACFCP11, LPC, MMC, MML, MTL2, OAT, PMT, SUN, SUN2, TMT, TPK, TWR, VPK, WMP, WTR
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 12 Coastal California Gnatcatcher Protection:</p> <ul style="list-style-type: none"> a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of coastal California gnatcatchers in the area and the importance of maintaining coastal sage scrub vegetation. b) As part of BIO MM 9 Protect Native Vegetation and Common Wildlife, disturbance to native perennial vegetation, especially coastal sage scrub vegetation (e.g., California sagebrush, sage, laurel sumac, and California buckwheat), would be minimized. Surveys shall be conducted by a qualified biologist for the presence of coastal sage scrub perennial vegetation, and plants not identified for removal within or near the construction zone shall be marked for protection. c) As part of BIO MM 3 Biological Compliance Reporting, the environmental monitor shall verify at least once a week during active construction and upon completion of construction activities that habitat protection measures have been followed. d) At proposed Project sites H-17A, PHN, and RIH, a higher level of protection is required to ensure that gnatcatchers are not present when construction activities would occur and adverse effects would be avoided. For proposed Project sites that include known or suspected gnatcatcher nesting or otherwise include suitable nesting habitat where the bird is expected to be present, the following mitigation measure is to ensure the highest level of protection to the bird. All the above measures (BIO MM 1 through BIO MM 3, and BIO MM 8 through BIO MM 12) apply as well as BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions 	H-17A, LEPS, PHN, PWT, RIH, SDW, VPK
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 14 Coastal California Gnatcatcher Protocol Surveys</p> <ul style="list-style-type: none"> a) To determine if coastal California gnatcatchers are present within 500 feet of specified Project sites and if breeding season restrictions would be required, surveys following the most recent version of the USFWS Coastal California Gnatcatcher Presence/Absence Survey Protocol (current revision issued by USFWS Carlsbad Office 1997) shall be conducted prior to initiating 	LEPS, PWT

Table ES-2: Environmental Impacts and Mitigation Measures


Resource Area	Impact	Mitigation Measure	Sites
		<p>any construction activities that may result in ground disturbance or loud noises during the gnatcatcher breeding season (February 15 through August 30). This protocol requires call-playback surveys by a permitted biologist, conducting a minimum of six surveys at least one week apart between March 15 and June 30 (additional survey requirements are presented in the protocol).</p> <p>b) If adult, nesting, or fledgling gnatcatchers are detected even once within 500 feet of the proposed Project site, or if surveys are not completed in compliance with the protocol, BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions shall apply to the site, precluding any construction activities that include loud noises (e.g., trenching, drilling, concrete cutting), the use of large equipment (e.g., booms, cranes, drills, concrete pouring), or the removal of perennial vegetation between February 15 and August 30.</p> <p>c) If no adult, nesting, or fledgling gnatcatchers are detected within 500 feet of the proposed Project site, construction activities may commence beginning July 1 through February 14.</p> <p>d)  Survey requirements shall be applied each year that construction activities take place at the Project site.</p>	
Cultural Resources	CUL-1: Significant and Unavoidable	<p>CUL MM 2: Archaeological Monitoring – Historic-Age Resources</p> <p>At proposed Project LMR sites with known or potential presence of historic-age archaeological material (artifacts and/or features) within the defined APEs, a qualified archaeological monitor shall be present during all subsurface excavation for tower or monopole foundations and during grading for access roads and structure foundations. Monitors will also be responsible for restricting access by construction personnel to any identified archaeological resources as noted in this EIR section or Chapter 4. The direct and indirect APEs are defined at the beginning of this EIR section.</p> <p>The archaeological monitor will, at a minimum, have a B.A. in anthropology or related field or will have successfully completed an archaeological field methods school. The monitor will work under the supervision of an archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards (Project Archaeologist). The standards are published in CFR 36 Part 61 and found on the National Park Service website at http://www.nps.gov/history/local-law/arch_stnds_9.htm.</p>	H-69B, LACFCP08, LACFCP09, LPC
Cultural Resources	CUL-1: Significant and Unavoidable	<p>CUL MM 5: Architectural Resources Protection and Camouflage</p> <p>Attachment of Equipment to Historic Buildings and Structures</p>	H-69B, LACFCP08, LACFCP09, LPC



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>Exterior antennas, wiring, towers, and other LMR equipment that are proposed to be attached to buildings, structures, objects, and other features that are listed, eligible, or potentially eligible for inclusion in the NRHP or CRHR, or are locally designated landmarks under CEQA may cause an adverse direct and/or visual effect. Mitigation measures to offset potential effects would include review of the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) and the Secretary of the Interior's Guidelines for the Treatment of Historic Properties (Guidelines), which can be found on the National Park Service's website at http://www.nps.gov/tps/standards.htm and http://www.nps.gov/tps/standards/four-treatments/standguide/index.htm respectively. The Standards are a series of practices for maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. The Guidelines assist in applying the complementary Standards to a specific property. Together, they provide a framework and guidance for decision-making about work or changes to a historical resource.</p> <p>For historic buildings or structures where communications-related equipment will be attached, the following preservation practices would shall be employed, as applicable, to ensure that impacts are less than ± significant:</p> <ol style="list-style-type: none"> 1) When running new exterior wiring to a historic building, existing entry points shall be utilized. If a new entry point is required, the entry shall be placed at the rear of the building or in an unobtrusive area on the side of the building i.e., an area where it will be hidden by an existing architectural feature. that [insert language characterizing what it means to be "unobtrusive" for purposes of this measure to ensure no impact]. 2) When wireless nodes, antennas, microwave or satellite dishes, etc. are installed on historic buildings, existing mounting points shall be utilized. For new mounts, nonpenetrating mounts shall be used. 3) Equipment shall be placed where it does not detract from the building's overall appearance; roof-mounted equipment shall be placed where it will not be visible from accessible locations at grade. Adequate structural support for the new equipment and design shall be ensured, and a system that minimizes the number of cutouts or holes in structural members and historic material shall be installed. Existing building features shall be used to conceal equipment. 4) New equipment installations on a historic building that will be visible shall be painted or color-matched to the surrounding building materials. Concealment with color-matched FRP (fiberglass reinforced plastic) shrouds (boxes) is acceptable. 5) Any supports or brackets for new equipment shall be color-matched to the existing materials. 	

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>6) The installation of exterior wiring shall be minimized; where unavoidable, the wiring will be color-matched to the original building material to reduce the visual impact.</p> <p>7) Equipment shall not be directly anchored into stone or brick; mortar joints for anchoring the equipment will be utilized.</p> <p>8) Rust-resistant mounts to prevent staining of the building materials shall be used.</p> <p>9) Reversible mounting techniques shall be used to avoid damage to building materials.</p> <p>10) Installation of underground cable or conduit at a historical resource shall be undertaken in a manner that considers the stability of the historic building, including limiting any new excavations adjacent to historic foundations that could undermine the structural stability of the building and avoiding landscape or other changes that could alter drainage patterns and cause water-related damage to the building.</p> <p>11) New interior wiring shall utilize space in existing chases, closets, or shafts.</p> <p>12) Equipment and systems shall be installed to cause the least alteration possible to the building's floor plan and the least damage to the historic building material.</p> <p>13) Vertical runs of conduit and cables shall be placed in closets, service rooms, and wall cavities to create the least intrusion into the historic fabric of the building and to avoid major intervention into the wall and floor systems.</p> <p>Architectural Camouflage</p> <p>All new towers and monopoles or a proposed increase in the height of existing towers and monopoles may that would cause adverse visual impacts on historical resources that are adjacent or within the viewshed shall be camouflaged. All camouflage implemented for the proposed Project designs would shall be sympathetic to the existing landscape and visually compatible with the surrounding architecture, and acceptable to the property owner (http://www.generalcode.com/codification/sample-legislation/cell-towers) and/or host community in accordance with applicable municipal codes (http://clkrep.lacity.org/onlinedocs/2009/09-2645_RPT_ATT_06-07-11.pdf). Tower disguises may include, but are not limited to, painting and various types of concealments, including (e.g., clock/water towers, flag/light poles, silos, trees, and unique site-specific designs). Such measures must also be consistent with the Secretary of the Interior's Standards/Guidelines for the Treatment of Historic Properties (see Attachment of Equipment discussion above). As noted within the required mitigation measures for some Project sites, the painting of towers of certain heights is controlled by FAA Advisory Circulars 47 CFR 5 17.21-17.58 to prevent aviation hazards; therefore,</p>	

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		painting would not, be a feasible mitigation at those sites.	
Cultural Resources	CUL-3: Less than Significant with Mitigation	<p>CUL MM 6: Potential Paleontological Resources Plan</p> <p>Proposed Project sites with the potential for paleontological resources would require preparation of a paleontological monitoring plan and a qualified paleontological monitor to be present during all subsurface excavation for tower or monopole foundations and during grading for access roads and structure foundations.</p> <p>In the event that a previously unidentified paleontological resource is uncovered, the following actions shall be taken:</p> <ol style="list-style-type: none"> 1) All ground disturbing work within 165 feet (50 meters) of the discovery shall be halted. A qualified paleontologist shall divert or direct construction activities in the area of an exposed fossil in order to facilitate evaluation and, if necessary, salvage of the exposed fossil. 2) The paleontologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, no further effort shall be required. 3) If the resource cannot be avoided and may be subject to further impact, the paleontologist shall evaluate the resource and determine whether it is "unique" under CEQA, Appendix G, Part V. If the resource is determined not to be unique, work may commence in the area. 4) If the resource is determined to be a unique paleontological resource, work shall remain halted, and the paleontologist shall consult with LA-RICS Authority staff regarding methods to ensure that no substantial adverse change would occur to the significance of the resource. Preservation in place (i.e., avoidance) is the preferred method of ensuring that no substantial adverse impacts occur to the resource and shall be required unless other equally effective methods are available. Other methods include ensuring that the fossils are scientifically recovered, prepared, identified, catalogued, and analyzed according to current professional standards. 5) Due to the small nature of some fossils, a fine mesh screen may be used at the discretion of the paleontologist at project-specific inspections to collect matrix samples for processing. 6) Provisions for preparation and identification of any fossils collected shall be made before donation to a suitable repository. 7) All recovered fossils shall be curated at a local accredited and permanent scientific institution 	AGH, AJT, ASD, CPK, ENT, GRM, H-17A, H-69B, LACFCP08, LARICSHQ, LEPS, SPN, OAT, PASPD01, PDC, PHN, PWT, RIH, SDW, SGH, SIM, TOP, WS1, ZHQ



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>according to Society of Vertebrate Paleontology standard guidelines standards. Work may commence upon completion of the appropriate treatment and the approval from the Authority.</p> <p><u>A Paleontological Resources Monitoring Plan shall be developed and approved prior to construction to guide the activities of monitors during ground-disturbing activities. The plan would include, but not be limited to, a description of the project location, the regulatory framework, site-specific impact mitigation requirements designed to reduce impacts to less than significant, specific locations and construction activities requiring monitoring and/or spot checking, procedures to follow for construction monitoring and fossil discovery and recovery, and a repository agreement with the Natural History Museum of Los Angeles County or other accredited repository. Mitigation measures that may be implemented to ensure that impacts to paleontological resources would be reduced to less than significant may include but are not limited to the following:</u></p> <ul style="list-style-type: none"> a) <u>Worker awareness training on paleontological resources presented to construction personnel prior to the start of construction. The training should include at minimum, the following:</u> <ul style="list-style-type: none"> • <u>The types of fossils that could occur at the project site</u> • <u>The procedures that should be taken in the event of a fossil discovery</u> • <u>Laws protecting paleontological resources</u> • <u>Penalties for destroying or removing paleontological resources</u> b) <u>Paleontological monitoring during ground disturbance at all sites with moderate/unknown or high paleontological potential</u> c) <u>Salvage of significant fossil resources</u> d) <u>Screenwashing of matrix samples for microfossils</u> e) <u>Laboratory preparation of recovered fossils to the point of identification and curation</u> f) <u>Identification of recovered fossils to the lowest possible taxonomic order</u> g) <u>Curation of significant fossils at the Natural History Museum of Los Angeles County or other accredited repository</u> h) <u>Preparation of a final monitoring report that includes at a minimum the dates of field work, results of monitoring, fossil analyses, significance evaluation, conclusions, locality forms, and an itemized list of specimens</u> <p><u>The Plan shall be submitted to the Authority for review and approval and finalized at least 14 days prior to the start of construction.</u></p>	



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
Cultural Resources	<p><u>CUL-3:Less than Significant with Mitigation</u></p>	<p><u>CUL MM 7: Paleontological Resources Monitoring</u></p> <p><u>Paleontological monitoring shall be conducted by a qualified paleontological monitor who has demonstrated experience in the collection and salvage of fossil materials. An undergraduate degree in geology or paleontology is preferable but is less important than documented experience performing paleontological monitoring and mitigation. The monitor will work under the supervision of a Principal Paleontologist.</u></p> <p><u>The qualified professional paleontological monitor shall be present during ground disturbance at all sites with moderate/unknown or high paleontological potential and as specified in the Paleontological Resources Monitoring Plan prepared in accordance with CUL MM 6. The monitor shall be present during all subsurface excavation for tower or monopole foundations and during grading for access roads and structure foundations. Any sites that require monitoring or mitigation within the Angeles National Forest will require a qualified paleontologist to have a U.S. Department of Agriculture Forest Service-Temporary Special-Use Permit for paleontology. Based on the specific site conditions observed during monitoring (type of sediment impacted, previous disturbances, nature of site conditions), the Principal Paleontologist may reduce or increase monitoring efforts in consultation with the Agency.</u></p> <p><u>In the event that a previously unidentified paleontological resource is uncovered, the following actions shall be taken:</u></p> <ol style="list-style-type: none"> <u>1) All ground-disturbing work within 50 feet of the discovery shall be halted. A qualified paleontologist shall divert or direct construction activities in the area of an exposed fossil in order to facilitate evaluation and, if necessary, salvage of the exposed fossil. Work shall not resume in the discovery area until authorized by the qualified paleontologist.</u> <u>2) The paleontologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, no further effort shall be required.</u> <u>3) If the resource cannot be avoided and may be subject to further impact, the paleontologist shall evaluate the resource and determine whether it is “unique” under CEQA, Appendix G, Part V. If the resource is determined not to be unique, work may commence in the area.</u> <u>4) If the resource is determined to be a unique paleontological resource, work shall remain halted, and the paleontologist shall consult with LA-RICS Authority staff regarding methods to ensure that no substantial adverse change would occur to the significance of</u> 	<p><u>AGH, AJT, ASD, CPK, ENT, GRM, H-17A, H-69B, LACFCP08, LARICSHQ, LEPS, SPN, OAT, PASPD01, PDC, PHN, PWT, RIH, SDW, SGH, SIM, TOP, WS1, ZHQ</u></p>



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p><u>the resource. Preservation in place (i.e., avoidance) is the preferred method of ensuring that no substantial adverse impacts occur to the resource and shall be required unless other equally effective methods are available. Other methods include ensuring that the fossils are scientifically recovered, prepared, identified, catalogued, and analyzed according to current professional standards.</u></p> <p>5) <u>Due to the small nature of some fossils, a fine mesh screen may be used at the discretion of the paleontologist to screen matrix test samples on site during monitoring. Additionally, bulk matrix samples may be collected and transported to a laboratory facility for processing.</u></p> <p>6) <u>Provisions for preparation and identification of any fossils collected shall be made before donation to a suitable repository.</u></p> <p>7) <u>All recovered fossils shall be curated at the Natural History Museum of Los Angeles County or a local accredited and permanent scientific institution according to Society of Vertebrate Paleontology standard guidelines standards. Work may commence upon completion of the appropriate treatment and the approval from the Authority.</u></p>	
Geology and Soils	GEO-1: Less than Significant with Mitigation	<p>GEO MM 1 : Prior to or concurrently with submittal of the application for a building permit for any portion of the proposed Project site, the project sponsor <u>Contractor</u> shall:</p> <ol style="list-style-type: none"> 1) Submit to the appropriate municipality (County of Los Angeles, County of San Bernardino, or city having jurisdiction over the site) a site-specific, design-level geotechnical report reviewed and approved by both an engineering geologist licensed in the State of California and a civil engineer licensed in the State of California. The report shall comply with all applicable state and local code requirements and shall: <ol style="list-style-type: none"> a. include an analysis of the expected ground motions at the site from known active faults using accepted methodologies b. include an analysis of all potential geologic hazards including but not limited to, landslides, mudslides, liquefaction potential, identification of active faults, land spreading, and land subsidence. The report shall be prepared in accordance with and meet the requirements of the County of Los Angeles Department of Public Works (LACDPW) Manual for Preparation of Geotechnical Reports, July 1, 2013. c. Specify liquefaction mitigations that shall use proven methods generally accepted by professional engineers to reduce the risk of liquefaction to a less than significant level such as: <ol style="list-style-type: none"> i. subsurface soil improvement 	AGH, ASD, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TMT, TOP, TPk, TWR, VPK, WAD, WMP, WTR, ZHQ

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<ul style="list-style-type: none"> ii. deep foundations extending below the liquefiable layers iii. structural slabs designed to span across areas of non-support iv. soil cover sufficiently thick over liquefaction soil to bridge liquefaction zones v. dynamic compaction vi. compaction grouting vii. jet grouting viii. mitigation for liquefaction hazards suggested in the California Geological Survey’s (CGS) Geology Guidelines for Evaluating and Mitigating Seismic Hazards (CGS Special Publication 117, 1997) including edge containment structures (berms, dikes, sea walls, retaining structures, compacted soil zones), removal or treatment of liquefiable soils, modification of site geometry, lowering the groundwater table, in-situ ground densification, deep foundations, reinforced shallow foundations, and structural design that can withstand predicated displacements d. Determine structural design requirements as prescribed by the most current version of the California Building Code, including applicable local county and local city amendments, to ensure that structures can withstand ground accelerations expected from known active faults e. Determine the final design parameters for walls, foundations, foundation slabs, utilities, roadways, parking lots, sidewalks, and other surrounding improvements 2) Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site specific investigations. 3) The project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet Building Code requirements, and incorporate all applicable mitigations from the investigation in the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements. 4) Site construction shall not begin until: <ul style="list-style-type: none"> a. The registered geotechnical engineer representing the applicable permitting municipality for the project site (county or city), or third party registered engineer retained to review the geotechnical reports, has reviewed each site specific geotechnical investigation, approved the final report, and required compliance with geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure and other relevant construction permits; and 	

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>b. The applicable permitting municipality for the project site (county or city) has reviewed all project plans for grading, foundations, structural, infrastructure and other relevant construction permits to ensure compliance with the applicable geotechnical investigation and other applicable Code requirements</p>	
Hazards and Hazardous Materials	HAZ-4: Less than Significant with Mitigation	<p>HAZ MM 1: Prior to construction activity, the construction contractor must shall prepare a Phase I Environmental Site Assessment meeting the standards outlined in the American Society for Testing Materials (ASTM), Practice for Limited Environmental Due Diligence: Transaction Screen Process E 1528.</p> <ul style="list-style-type: none"> Phase I documents shall be reviewed to determine if the lateral and vertical extent of impacted soil and/or groundwater will be encountered by proposed construction activities. If proposed construction activities will not encounter impacted soil or groundwater based on the documented vertical and lateral extent, no further action will be required. If it is determined that the construction footprint will encounter impacted soils or encounter impacted groundwater, the contractor shall prepare a site-specific Health and Safety Plan that meets the requirements of 29 CFR 1910 for worker safety. If the lateral and vertical extent or the nature of the impacted soil cannot be determined from available documents, a Phase II investigation shall be completed to determine if the soils and/or groundwater that may be encountered during construction (within the footprint any excavation) are impacted. The Phase II investigation shall also determine the nature of contaminations that may be encountered. The Phase II report should also address disposal alternatives and procedures for any impacted soil that may be encountered or groundwater which may need to be removed. 	PDC
Hazards and Hazardous Materials	HAZ-5: Less than Significant with Mitigation	<p>HAZ MM 2: Prior to issuance of building permits, the Contractor shall submit Form 7460-1 (Notice of Proposed Construction or Alteration) to the FAA, in the form and manner prescribed in 14 CFR Part 77. The Contractor shall also provide documentation to the appropriate city or county planning agency demonstrating that the FAA has issued a “Determination of No Hazard to Air Navigation”</p> <p>The FAA regulates objects affecting navigable airspace according to 14 CFR Part 77. The federal and state Departments of Transportation also require the proponent to submit FAA Form 7460-1, Notice of Proposed Construction or Alteration. According to 14 CFR Part 77, notification allows the FAA to identify potential aeronautical hazards in advance, thus preventing or minimizing any adverse impacts on the safe and efficient use of navigable airspace.</p>	SDW

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		Per 14 CFR Part 77, notification requirements include sending one executed form set (four copies) of FAA Form 7460–1, Notice of Proposed Construction or Alteration, to the Manager, Air Traffic Division, of the FAA Regional Office having jurisdiction over the area within which the construction or alteration will be located. The notice required must be submitted at least 45 days before the earlier of the following dates: (1) the date the proposed construction or alteration is to begin, or (2) the date an application for a construction permit is to be filed.	
Hazards and Hazardous Materials	HAZ-8: Less than Significant with Mitigation	HAZ MM 3: Fire Management Plan. Prior to construction activity, the Authority must shall work with the agency responsible for fire protection in the jurisdiction where the site is located to develop and implement a fire management plan for use during construction activity. The plan will identify project locations, project descriptions, anticipated construction activities, limitation of activities during periods of elevated fire risk (e.g., “red flag” days), level of suppression equipment required on site, training requirements, and points of contact.	AGH, AJT ,BJM , BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PHN, PMT, PWT, RIH, SDW, SIM, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ
Noise	NOI-3: Less than Significant with Mitigation	<p>NOI MM 2: Prior to commencement of construction at Site WS1, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction noise impacts below the levels specified in the City of Santa Monica noise ordinance. Such measures may include but are not limited to the following:</p> <ul style="list-style-type: none"> • Use noise blankets or other muffling devices on equipment and quiet-use generators at noise-sensitive receivers. • Use well-maintained equipment and have equipment inspected regularly. • Operate construction equipment for periods of fewer than 15 consecutive minutes when possible. <p>NOI MM 3: Prior to commencement of construction at any site with an applicable⁺ noise ordinance where construction activities are necessary outside the specified hours in the ordinance, the Authority shall apply for and obtain variances from the agency with jurisdiction at that site.</p>	WS1
Transportation/Traffic	TRANS-3: Significant Impact Reduced to Less than Significant with Mitigation	HAZ MM 2: Prior to issuance of building permits, the Contractor shall submit Form 7460–1 (Notice of Proposed Construction or Alteration) to the FAA, in the form and manner prescribed in 14 CFR Part 77. The Contractor shall also provide documentation to the appropriate city or county planning agency demonstrating that the FAA has issued a “Determination of No Hazard to Air Navigation.” See above	BJM, DPK, SDW, SGH



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p><u>The FAA regulates objects affecting navigable airspace according to 14 CFR Part 77. The federal and state Departments of Transportation also require the proponent to submit FAA Form 7460–1, Notice of Proposed Construction or Alteration. According to 14 CFR Part 77, notification allows the FAA to identify potential aeronautical hazards in advance, thus preventing or minimizing any adverse impacts on the safe and efficient use of navigable airspace.</u></p> <p><u>Per 14 CFR Part 77, notification requirements include sending one executed form set (four copies) of FAA Form 7460–1, Notice of Proposed Construction or Alteration, to the Manager, Air Traffic Division, of the FAA Regional Office having jurisdiction over the area within which the construction or alteration will be located. The notice required must be submitted at least 45 days before the earlier of the following dates: (1) the date the proposed construction or alteration is to begin, or (2) the date an application for a construction permit is to be filed.</u></p>	
Transportation/Traffic	TRANS-4: Less than Significant with Mitigation	<p>TRANS MM 1: The construction contractor shall maintain a minimum of one open lane of traffic at all site access roads during project construction. Use of standard construction traffic control practices such as flagmen, warning signs, and other measures shall be implemented as necessary to ensure that traffic flow remains uninterrupted at all times.</p> <p>TRANS MM 2: Any temporary road or lane closures that may affect state highways shall be coordinated with Caltrans prior to commencement of construction at the site that will require the road or lane closures. If construction requires temporary road or lane closures on roads and streets managed by local entities, a traffic management plan shall be prepared and submitted to the relevant county and/or city public works department or other appropriate department for approval prior to commencement of construction at the site. Encroachment permits would be obtained where applicable</p> <p><u>TRANS MM 2: Any temporary road or lane closures that may affect state highways shall be coordinated with Caltrans prior to commencement of construction at the site that will require the road or lane closures. If construction requires temporary road or lane closures on roads and streets managed by local entities, a traffic management plan shall be prepared and submitted to the relevant county and/or city public works department or other appropriate department for approval prior to commencement of construction at the site. Encroachment permits would be obtained where applicable.</u></p>	ASD, LARICSHQ, PASPD01, PDC, SGH, SIM, WS1, ZHQ

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
Utilities/Service Systems	UTL-1: Significant Impact Reduced to Less than Significant with Mitigation	UTL MM 1: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would <u>shall</u> be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.	AGH, ASD, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ
[†]The LA-RICS Authority is not subject to certain local noise ordinances under the doctrine of intergovernmental immunity (Cal. Gov. Code 5-53090(a)).			



Page 1-11; Section 1.6.2

The responsible and trustee local agencies listed in Section 1.6.2 is hereby amended as follows:

Local Agencies

- Los Angeles County
- City of Agoura Hills
- City of Beverly Hills
- City of Calabasas
- City of Cerritos
- City of Chino Hills
- City of Glendale
- [City of Long Beach](#)
- City of Los Angeles
- City of Malibu
- City of Monterey Park
- City of Palmdale
- City of Pasadena
- City of San Dimas
- City of Santa Monica
- City of Signal Hill
- City of West Hollywood
- City of Whittier

Pages 2-16 & 2-18; Table 2.1-1: Potential LMR Sites Analyzed in This EIR

Site information for Sites DPK and SGH, listed in Table 2.1-1, is hereby amended as follows:

Table 2.1-1: Potential LMR Sites Analyzed in This EIR

Site ID	Site Name	Address			Jurisdiction
		Street	City	Zip Code	
DPK	Dakin Peak	Avalon Canyon Rd. Divide Road	Santa Catalina Island	90704	Los Angeles County
SGH	Signal Hill	2321 Stanley Ave.	Signal Hill	90755	Signal Hill Long Beach

Page 2-28; Lighting

The text in this section is hereby amended as follows:

The sites would have security lighting. New equipment shelters would generally require exterior security lighting equivalent to a 100-watt light bulb. [Security lighting would be motion-sensing in rural locations and continuous in urban locations.](#) Where required by the FAA, new antenna support structures would be lighted and/or marked consistent with FAA Advisory Circular, AC 70/7460-1L Obstruction Marking and Lighting, for visibility to aircraft, as applicable, based on proposed structure height and location. FAA lighting is not generally required for towers less than 200 feet in height above ground level; however, lighting for air navigation safety may be required at specific locations for shorter structures, depending

on site conditions. If tower obstruction lighting is installed on a tower, it may include red or white light-emitting diode (LED) lamps or strobe lights that are steady and/or flashing.

Page 2-40; Section 2.3

The text in this section is hereby amended as follows:

Sites BUR, BUR1, BUR2, and BUR3, ~~and BUR 4~~

Page 2-42; Section 2.5

The text in this section is hereby amended as follows:

Sites BUR, BUR1, BUR2, and BUR3, ~~and BUR 4~~

Page 2-47; Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Information about projects within 2 miles of Site AJT, listed in Table 2.7-1, is hereby amended as follows:

Table 2.7-2: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
AJT	1.76	9,295	Stonefield Development	1850 Fairway Dr.	Chino Hills	New 28 SFR in gated community in 35 acres	Post Entitlement Review	Tentative subdivision map approved
	1.83	9,660	Hidden Oaks Country Club	1285 Carbon Canyon Rd.	Chino Hills	New 107 residential lots hillside development with open space	Env. Review: EIR	in review
	1.45	7,657	Foremost Communities - Canyon Hills	16432 Carbon Canyon Rd.	Chino Hills	New 76 SFR development with open space	Under Construction	approved tract map

Page 3-10; Table 3.1-1: Project Sites Located in Areas Generally Containing High or Medium Viewer Sensitivity

Information about projects sites located in areas generally containing high or medium viewer sensitivity for Sites BJM, DPK, SGH, and TWR is hereby amended as follows:

Table 3.1-3. Project Sites Located in Areas Generally Containing High or Medium Viewer Sensitivity

LMR Site	Name	Federal			State		Scenic Highway or Regional Trail	Regional or Municipal Park	Historic District	Significant Ridgeline	Visual Sensitivity*	Located Within a Scenic Vista
		Angeles National Forest and San Gabriel Mountains NM		Within SMMNRA Boundary	Coastal Zone	Park						
		SIO/ SAC ¹	USFS Land Use Zone									
BJM	Blackjack Peak				Santa Catalina Island LCP		Trans-Catalina Trail	Catalina Island Conservancy Open Space Easement			High	X
DPK	Dakin Peak				Santa Catalina Island LCP		Trans-Catalina Trail	Catalina Island Conservancy Open Space Easement			High	X

Table 3.1-3. Project Sites Located in Areas Generally Containing High or Medium Viewer Sensitivity

LMR Site	Name	Federal			State		Scenic Highway or Regional Trail	Regional or Municipal Park	Historic District	Significant Ridgeline	Visual Sensitivity*	Located Within a Scenic Vista
		Angeles National Forest and San Gabriel Mountains NM		Within SMMNRA Boundary	Coastal Zone	Park						
		SIO/ SAC ¹	USFS Land Use Zone									
SGH	Signal Hill						Skyline Drive	Hilltop and Sunset View parks			Medium	
TWR	Tower Peak				Santa Catalina Island LCP		Trans-Catalina Trail	Catalina Island Conservancy Open Space Easement			High	X

Page 3-16; Section 3.1.1.3

Section 3.1.1.3, addressing scenic corridors, is hereby amended to add the following text after the City of Malibu Scenic Roads text and before the discussion on Santa Monica Mountains North Plan Scenic Routes:

City of Signal Hill Scenic Route

The SGH site is located on a hilltop within a gated residential community, approximately 200 feet north of Skyline Drive. The 2009 City of Signal Hill General Plan Circulation Element identifies Skyline Drive as a scenic route (City of Signal Hill 2009). The plan notes that ‘The entire route provides views of urban Southern California, the ocean, and the downtown Long Beach skyline.’ These views are on the south side of the scenic route. Site SGH is entirely surrounded by residences, as well as a similar site with a large lattice tower immediately adjacent to the south, and an oil drilling rig directly east of and adjacent to the other telecommunication tower.

Page 3-17; Section 3.1.1.3

Section 3.1.1.3, addressing Trans-Catalina Trail is hereby amended to delete the following text:

~~Although it has no official scenic designation,~~ The 37-mile Trans-Catalina trail, completed in 2009, traverses Catalina Island in its entirety and offers “spectacular views across the 43,000-acre Nature Preserve of the Catalina Island Conservancy” (Catalina Island Conservancy 2014). Sites BJM, DPK, and TWR are adjacent to this trail.

Page 3-17; Section 3.1.1.4

Section 3.1.1.4, addressing State and regional parks as well as open space and recreation areas, is hereby amended to add the following text after the subheading and before Topanga State Park:

Catalina Island Conservancy Open Space Easement

A 50-year Open Space Easement Agreement was signed between the County of Los Angeles and the Santa Catalina Island Company in 1974 to preserve the natural character of the island (City of Santa Catalina Island 1983). Land uses defined as Open Space/Directed Recreation and Conservation/Primitive Recreation together comprise 96 percent of Catalina Island. Although no maps were readily available identifying or designating this open space at the time of this analysis, it is assumed that sites BJM, DPK, and TWR are located within this open space.

Page 3-33; Section 3.1.4.1

The project analysis for CEQA Question AES-2 within Section 3.1.4.1 is hereby revised as follows:

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?



No scenic resources were identified within any Project site boundary. The following Project sites are located adjacent to scenic highways as discussed in Section 3.1.1.3:

ENC1	ENT	H-69B	JOP	LACF072
LACFCP08	LEPS	PWT	<u>SGH</u>	TMT
WS1	ZHQ			

Operation Impacts

The SGH site is located approximately 200 feet north of Skyline Drive, designated as scenic by the City of Signal Hill for providing ‘views of Southern California, the ocean, and the downtown Long Beach Skyline.’ However, these views are to the south of the road; the site is on the opposite (north) side of the road. Therefore, the site would not interfere with those views or affect the road’s scenic designation. In addition, views to the south from Skyline Drive adjacent to the site are blocked by existing residential structures. Operational impacts for all other sites would be as described under AES-1 (effects on a scenic vista). Operational impacts on scenic resources would be less than significant.

Page 3-56; Section 3.2.2.3

The local regulatory setting for the Antelope Valley Air Quality Management District (AVAQMD) is hereby revised to add the following:

AVAQMD

AVAQMD Regulation II, Rule 219 (2011) – Federal Operating Permit Requirements

The purpose of this rule is to describe equipment that does not require a permit and which does not need to be listed on an application for a Federal Operating Permit (FOP) or on an issued FOP. Equipment powered by piston type internal combustion engines with a manufacturer’s rating of 50 bhp or less do not require a FOP under this rule.

Page 3-57; Section 3.2.2.3

The local regulatory setting for the South Coast Air Quality Management District (AVAQMD) is hereby revised to add the following:

SCAQMD

SCAQMD Regulation XIV, Rule 1470 (2012) – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines

This rule shall apply to any person who sells, owns, or operates a stationary combustion ignition (CI) engine in the SCAQMD with a rated brake horsepower greater than 50 bhp. Equipment powered by CI engines in excess of 50 bhp, with some exceptions, are required to obtain a permit from the District.



Pages 3-80 to 3-81, Table 3.3-1: Vegetation Communities within the Study Area

Table 3.3-1 is hereby amended to add to the list of Project sites within the study area for selected vegetation communities, as follows:

Table 3.3-4: Vegetation Communities within the Study Areas¹

Vegetation Community	Vegetation Alliance	Study Area(s)
Coastal Sage Scrub	California sagebrush scrub	AGH, BJM, DPK, FTP, GRM, LEPS, MMC, TWR, WTR
Mixed chaparral	Scrub oak chaparral	BJM, CPK, DPK, ENT, TWR, VPK
	Thick-leaved Yerba Santa scrub	JOP
	Toyon chaparral	GRM, TWR
Non-native grassland	Annual brome grass Semi-natural herbaceous stands	BJM, DPK, TPK, TWR

Page 3-83, Section 3.3.1.2

The text revising special status species designations is hereby amended as follows:

[Santa Catalina Island](#)

[Species identified from the Santa Catalina Island Local Coastal Plan \(Appendix G\)](#)

[Species information received in public comments from the Catalina Conservancy](#)

Page 3-85, Table 3.3-3

The study area description for sites BJM, DPK, and TWR, as listed in Table 3.3-3, are hereby amended as follows:

Table 3.3-5: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
BJM	<p>Site BJM is located on Black Jack Peak on Santa Catalina Island on a hilltop that has been leveled and mostly paved to support the existing facilities. The vegetation in the area has been heavily impacted by overgrazing and long term drought, resulting in bare soil and an increase in non-palatable plant species. Adjacent to the site is coastal sage scrub bisected by hiking trails and bike paths. The site contains many native and nonnative mature trees. Diagnostic woody shrubs include coast prickly pear (<i>Opuntia littoralis</i>), laurel sumac (<i>Malosma laurina</i>), toyon (<i>Heteromeles arbutifolia</i>), coyote bush (<i>Baccharis pilularis</i>), bush monkeyflower (<i>Diplacus aurantiacus</i>), lemonadeberry (<i>Rhus integrifolia</i>), and island oak (<i>Quercus pacifica</i>).</p> <p>Site BJM is located on the top of Blackjack Peak, the third highest mountain on Catalina Island. North-facing slopes of Blackjack are dominated by intact Island Scrub Oak (<i>Quercus pacifica</i>) Chaparral; south-facing slopes are dominated by intact Coastal Sage Scrub (note: areas mapped as Bare Ground in 2003 are largely recovering into Coastal Sage Scrub). Outside the study area, a former silver mine pit is located above the Blackjack Campground access road on the north side of the peak. Blackjack Peak is visible from many locations on and around Catalina Island. The Trans-Catalina Trail passes just southwest of the peak; and the Airport Road, very popular for motor tours, is just to the east.</p>	Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	ESA-E CA-T
		Townsend's big-eared bat (<i>Corynorhinus townsendii</i>)	CA-PT CDFW-SSC
		two-striped garter snake (<i>Thamnophis hammondi</i>)	CDFW-SSC
		beach spectaclepod (<i>Dithyrea maritima</i>)	CA-T CRPR-1B.1
		California dissantheium (<i>Dissantheium californicum</i>)	CRPR-1B.2
		Catalina crossosoma (<i>Crossosoma californicum</i>)	CRPR-1B.2
		island rush-rose (<i>Crocanthemum greenii</i>)	ESA-T CRPR-1B.2
		round-leaved filaree (<i>California macrophylla</i>)	CRPR-1B.1
		Santa Catalina figwort (<i>Scrophularia villosa</i>)	CRPR-1B.2
		Santa Catalina Island currant (<i>Ribes viburnifolium</i>)	CRPR-1B.2
		Santa Catalina Island ironwood (<i>Lyonothamnus floribundus ssp. floribundus</i>)	CRPR-1B.2
		Santa Catalina Island manzanita (<i>Arctostaphylos catalinae</i>)	CRPR-1B.2
		Santa Cruz Island rockcress (<i>Sibara filifolia</i>)	ESA-E CRPR-1B.1

Table 3.3-5: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
		Wallace's nightshade (<i>Solanum wallacei</i>)	CRPR-1B.1
DPK	<p>Site DPK is located on Santa Catalina Island on a ridgeline within a transition of coastal sage scrub and chaparral vegetation communities. The area has been overgrazed, resulting in areas of bare soil. Common shrubs include coast prickly pear, white sage (<i>Salvia apiana</i>), laurel sumac, island buckwheat (<i>Eriogonum crocatum</i>), sagebrush, toyon (<i>Heteromeles arbutifolia</i>), black sage, and lemonadeberry.</p> <p>Site DPK is located on the top of Dakin Peak, a prominent high point above Avalon and Silver/Grand canyons. The peak is dominated by Coastal Sage Scrub with areas of Grassland (<i>Bromus-Avena-Nasella</i>) and Island Scrub Oak (<i>Quercus pacifica</i>) Chaparral. Outside the study area, Dakin Peak is visible from many locations on and around Catalina Island. The Trans-Catalina Trail follows the Divide Road immediately east and northwest of the existing tower. The Divide Road is also a very popular road for interior jeep tours.</p>	Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	ESA-E CA-T
		Santa Catalina shrew (<i>Sorex ornatus willetti</i>)	CDFW-SSC
		aphanisma (<i>Aphanisma blitoides</i>)	CRPR-1B.2
		beach spectaclepod (<i>Dithyrea maritima</i>)	CA-T CRPR-1B.1
		California dissanthelium (<i>Dissanthelium californicum</i>)	CRPR-1B.2
		Catalina crossosoma (<i>Crossosoma californicum</i>)	CRPR-1B.2
		chaparral ragwort (<i>Senecio aphanactis</i>)	CRPR-2B.2
		coast woolly-heads (<i>Nemacaulis denudata</i> var. <i>denudata</i>)	CRPR-1B.2
		Coulter's saltbush (<i>Atriplex coulteri</i>)	CRPR-1B.2
		Davidson's saltscale (<i>Atriplex serenana</i> var. <i>davidsonii</i>)	CRPR-1B.2
		island green dudleya (<i>Dudleya virens</i> ssp. <i>insularis</i>)	CRPR-1B.2
		island rush-rose (<i>Crocانthemum greenei</i>)	ESA-T CRPR-1B.2
		Nevin's woolly sunflower (<i>Constancea nevinii</i>)	CRPR-1B.3
		round-leaved filaree (<i>California macrophylla</i>)	CRPR-1B.1

Table 3.3-5: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
		Santa Catalina figwort (<i>Scrophularia villosa</i>)	CRPR-1B.2
		Santa Catalina Island bedstraw (<i>Galium catalinense</i> ssp. <i>catalinense</i>)	CRPR-1B.2
		Santa Catalina Island currant (<i>Ribes viburnifolium</i>)	CRPR-1B.2
		Santa Catalina Island desert-thorn (<i>Lycium brevipes</i> var. <i>hasse</i>)	CRPR-1B.1
		Santa Catalina Island ironwood (<i>Lyonothamnus floribundus</i> ssp. <i>floribundus</i>)	CRPR-1B.2
		Santa Catalina Island manzanita (<i>Arctostaphylos catalinae</i>)	CRPR-1B.2
		Santa Catalina Island monkeyflower (<i>Mimulus traskiae</i>)	CRPR-1A
		Santa Cruz Island rockcress (<i>Sibara filifolia</i>)	ESA-E CRPR-1B.1
		showy island snapdragon (<i>Gambelia speciosa</i>)	CRPR-1B.2
		south coast saltscale (<i>Atriplex pacifica</i>)	CRPR-1B.2
		Wallace's nightshade (<i>Solanum wallacei</i>)	CRPR-1B.1
TWR	Site TWR is located on a hilltop of Tower Peak along a steep ridge in highly disturbed coastal sage scrub vegetation. Island oak trees are on north-facing slopes and into broad canyons below the Project site. Coastal sage scrub on the dryer habitats is dominated by coast prickly pear, coastal sagebrush, and toyon. <u>Site TWR is located on the top of Tower Peak, a prominent high point above the Isthmus/Two Harbors area. The peak is dominated by Coastal Sage Scrub with areas of Grassland (Bromus-Avena-Nasella) and Island Scrub Oak (<i>Quercus pacifica</i>) Chaparral. The Trans-Catalina Trail follows the Banning Road</u>	Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	ESA-E CA-T
		essential fish habitat	MSA
		beach spectaclepod (<i>Dithyrea maritima</i>)	CA-T CRPR-1B.1
		California dissanthelium (<i>Dissanthelium californicum</i>)	CRPR-1B.2

Table 3.3-5: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
	immediately west of the existing tower. Outside the study area, Tower Peak is visible from many locations on and around Catalina Island.	Catalina crossosoma (<i>Crossosoma californicum</i>)	CRPR-1B.2
		Catalina Island dudleya (<i>Dudleya virens</i> ssp. <i>hassei</i>)	CRPR-1B.2
		Coulter's saltbush (<i>Atriplex coulteri</i>)	CRPR-1B.2
		decumbent goldenbush (<i>Isocoma menziesii</i> var. <i>decumbens</i>)	CRPR-1B.2
		Lyon's pentachaeta (<i>Pentachaeta lyonii</i>)	ESA-E ESA-CH CA-E CRPR-1B.1
		Nevin's woolly sunflower (<i>Constancea nevinii</i>)	CRPR-1B.3
		round-leaved filaree (<i>California macrophylla</i>)	CRPR-1B.1
		Santa Catalina figwort (<i>Scrophularia villosa</i>)	CRPR-1B.2
		Santa Catalina Island bedstraw (<i>Galium catalinense</i> ssp. <i>catalinense</i>)	CRPR-1B.2
		Santa Catalina Island currant (<i>Ribes viburnifolium</i>)	CRPR-1B.2
		Santa Catalina Island ironwood (<i>Lyonothamnus floribundus</i> ssp. <i>floribundus</i>)	CRPR-1B.2
		showy island snapdragon (<i>Gambelia speciosa</i>)	CRPR-1B.2
		Wiggins' cryptantha (<i>Cryptantha wigginsii</i>)	CRPR-1B.2

Page 3-102, Section 3.3.1.2

The text is hereby amended by including the following information:

In addition to the sensitive species identified in Table 3.3-3, the following species have been identified as locally important from the Catalina Conservancy and Appendix G of the Santa Catalina Island Local Coastal Plan. Where appropriate, species names shown from Appendix G of the Local Coastal Plan have been updated (with the former names shown in parentheses).

<u><i>Abronia umbellata</i></u>	<u><i>Acmispon (Lotus) argophyllus</i> var <i>ornithopus</i></u>	<u><i>Acmispon (Lotus) grandiflora</i></u>	<u><i>Acmispon glaber (Lotus scoparius)</i></u>
<u><i>Acmispon subpinnatus</i></u>	<u><i>Ammannia coccinea</i></u>	<u><i>Andropogon barbinodis</i></u>	<u><i>Arthrocnemum (Salicornia) subterminale</i></u>
<u><i>Antirrhinum kelloggii</i></u>	<u><i>Aphanisma blitoides</i></u>	<u><i>Arctostaphylos catalinae</i></u>	<u><i>Arenaria douglasii</i></u>
<u><i>Aristida adscensionis</i></u>	<u><i>Asclepias fascicularis</i></u>	<u><i>Aspidotis californica</i></u>	<u><i>Astragalus didymocarpus</i> var <i>didymocarpus</i></u>
<u><i>Astragalus trichopodus</i> var <i>trichopodus</i></u>	<u><i>Athysanus pusillus</i></u>	<u><i>Atriplex coulteri</i></u>	<u><i>Atriplex watsonii</i></u>
<u><i>Bergerocactus emoryi</i></u>	<u><i>Brodiaea jolonensis</i></u>	<u><i>Bromus arizonicus</i></u>	<u><i>Calandrinia maritima</i></u>
<u><i>Callitriche marginata</i></u>	<u><i>Cardamine californica</i></u>	<u><i>Carex praeagrailis</i></u>	<u><i>Carex triquetra</i></u>
<u><i>Carpobrotus aequilaterus</i></u>	<u><i>Ceanothus arboreus</i></u>	<u><i>Ceanothus megaracarpus</i> var <i>insularis</i></u>	<u><i>Cercocarpus traskiae</i></u>
<u><i>Chenopodium macrospermum</i> var <i>farinosum</i></u>	<u><i>Chorizanthe staticoides</i></u>	<u><i>Clinopodium (Satureja) douglasii</i></u>	<u><i>Constancea (Eriophyllum) nevinii</i></u>
<u><i>Crassula aquatica</i></u>	<u><i>Cressa truxillensis</i> var <i>vallicola</i></u>	<u><i>Crocianthemum (Helianthemum) greenei</i></u>	<u><i>Crossosoma californicum (californica)</i></u>
<u><i>Cryptantha micromeres</i></u>	<u><i>Cryptantha wigginsii</i></u>	<u><i>Deinandra (Hemizonia) clementina</i></u>	<u><i>Dendromecon harfordii</i></u>
<u><i>Dendromecon rigida</i> ssp <i>rhamnoides</i></u>	<u><i>Dichondra occidentalis</i></u>	<u><i>Dissanthelium californicum</i></u>	<u><i>Dudleya greenei</i></u>
<u><i>Dudleya virens</i> ssp <i>hassei</i></u>	<u><i>Dudleya virens</i> ssp <i>insularis</i></u>	<u><i>Elatine californica</i></u>	<u><i>Eriastrum filifolium</i></u>
<u><i>Eriqeron foliosus</i></u>	<u><i>Eriqeron grande</i> var <i>grande</i></u>	<u><i>Eriodictyon traskiae</i> ssp <i>traskiae</i></u>	<u><i>Eriogonum giganteum</i> var <i>giganteum</i></u>
<u><i>Eschscholtzia ramosa</i></u>	<u><i>Euphorbia misera</i></u>	<u><i>Euphorbia spatulata</i></u>	<u><i>Galium catalinense</i> ssp <i>catalinense</i></u>
<u><i>Galium nuttallii</i> ssp <i>insulare</i></u>	<u><i>Gambelia (Galvesia) speciosa</i></u>	<u><i>Gilia capitata</i> ssp <i>abrotanifolia</i></u>	<u><i>Gilia nevinii</i></u>

<u>Gnaphalium palustre</u>	<u>Helenium puberulum</u>	<u>Hesperolinon micranthum</u>	<u>Heteromeles arbutifolia var macrocarpa</u>
<u>Holodiscus discolor</u>	<u>Hordeum intercedens</u>	<u>Hordeum californicum</u>	<u>Jaumea carnosa</u>
<u>Jepsonia malvifolia</u>	<u>Lavatera assurgentiflora</u>	<u>Laennecia (Conyza) coulteri</u>	<u>Lastarriaea (Chorizanthe) coriacea</u>
<u>Lepechinia fragrans</u>	<u>Leptosyne (Coreopsis) gigantea</u>	<u>Linanthus bicolor</u>	<u>Lithophragma affine ssp mixtum</u>
<u>Lycium brevipes var hassei</u>	<u>Lyonothamnus floribundus ssp floribundus</u>	<u>Malvella (Sida) leprosa</u>	<u>Mentzelia micrantha</u>
<u>Microseris douglasii ssp platycarpha</u>	<u>Mimulus guttatus</u>	<u>Mimulus traskiae</u>	<u>Monanthochloe littoralis</u>
<u>Nemophila menziesii</u>	<u>Notholaena californica</u>	<u>Ophioglossum californicum</u>	<u>Orobanche bulbosa</u>
<u>Orobanche fasciculata franciscana</u>	<u>Papaver californicum</u>	<u>Paspalum distichum</u>	<u>Pentachaeta (Chaetopappa) lyonii</u>
<u>Phacelia distans</u>	<u>Phacelia grandiflora</u>	<u>Phacelia lyonii</u>	<u>Piperia unalascensis</u>
<u>Plagiobothrys nothofulvus</u>	<u>Platystemon californicus</u>	<u>Pluchea odorata (purpurascens)</u>	<u>Potamogeton foliosus</u>
<u>Potentilla glandulosa</u>	<u>Pseudognaphalium (Gnaphalium) microcephalum</u>	<u>Psilocarphus tenellus</u>	<u>Quercus engelmannii</u>
<u>Quercus lobata</u>	<u>Quercus tomentella</u>	<u>Rhamnus pirifolia</u>	<u>Ribes viburnifolium</u>
<u>Salicornia pacifica</u>	<u>Shoenoplectus americanus (Scirpus olneyi)</u>	<u>Scirpus robustus</u>	<u>Scrophularia villosa</u>
<u>Sibara filifolia</u>	<u>Sisyrinchium bellum</u>	<u>Solanum wallacei</u>	<u>Solidago velutina ssp californica</u>
<u>Senecio lyonii</u>	<u>Spergularia marina</u>	<u>Stebbinoseris (Microseris) heterocarpa</u>	<u>Stipa cernua</u>
<u>Stylomecon heterophylla</u>	<u>Suaeda californica</u>	<u>Thysanocarpus curvipes ssp elegans</u>	<u>Trichostema lanceolatum</u>
<u>Trifolium albopurpureum</u>	<u>Trifolium gracilentum</u>	<u>Trifolium macraei</u>	<u>Trifolium microdon var pilosum</u>
<u>Trifolium palmeri</u>	<u>Tropidocarpum gracile</u>	<u>Vitis girdiana</u>	<u>Xylococcus bicolor</u>



Page 3-103, Table 3.3-4: Sensitive Plant Communities Located within One Mile of Proposed Project Sites

The list of Project sites located within one mile of the California Walnut Woodland vegetative community is hereby amended as follows:

Table 3.3-6: Sensitive Plant Communities Located within One Mile of Proposed Project Sites

Sensitive Community	Project Sites
California Walnut Woodland	AGH , AJT, ENT, OAT, PHN, SIM

Pages 3-126 and 3-128; Table 3.3-7: Species with Suitable Habitat Generally within the Study Areas

The list of Project sites with a study area generally within suitable habitat for certain protected species is hereby amended as follows:

Table 3.3-7: Species with Suitable Habitat Generally within the Study Areas

Species	Status Designations	Proposed Project Site Study Area(s)
burrowing owl (<i>Athene cunicularia</i>)	CDFW-SSC	BJM , DPK , H-17A, TWR
California mountain kingsnake (<i>Lampropeltis zonata</i>)	CDFW-SSC USFS-Sens	BJM , H-69B, SPN, TOP
Townsend's big-eared bat (<i>Corynorhinus townsendii</i>)	CA-PT CDFW-SSC USFS-Sens	BJM, DPK , TWR

Pages 3-131 and 3-132; Section 3.3.4.1

Three biological resource mitigation measures are hereby amended as follows:

BIO MM 1 **Conservation** [Mitigation](#) Monitoring and Reporting Plan

Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement a mitigation monitoring and reporting plan (MMRP) for the proposed Project. The MMRP would serve to organize environmental compliance requirements identified in best management practices, mitigation measures, permit requirements, real property agreement conditions, [coordination with the land management agency\(s\)](#), and other applicable sources. The MMRP shall contain an organization chart and communication plan for environmental compliance as it relates to the proposed Project.

BIO MM 2 Worker Environmental Awareness Program

Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement, [including coordination with the respective land management agency](#), a Worker Environmental Awareness Program (WEAP) for the proposed Project. This mitigation measure would serve to institute and formalize an education program to increase awareness of environmental resources and measures and rules that are in place to help minimize impacts to those resources.

BIO MM 5 Hazardous Materials Management:

- a) A toxic substance management and spill response plan shall be prepared by the contractor [for review and approval by the Authority](#).
- b) Hazardous materials shall be contained; spills shall be prevented; and any spills at the Project site or along access roads shall be contained and cleaned up immediately.
- c) All construction vehicles are required to carry at least one spill response kit.
- d) Any spills shall be accounted for in reports prepared by the biological/environmental monitor.

Page 3-147; Section 3.3.4.1

The last paragraph of the impact analysis for raptors is hereby amended as follows:

The burrowing owl was recorded about 0.2 mile west of the proposed Project Site H-17A along Skyline/Fire Ridge Road. The bird was using the cleared firebreak along the road following the ridge. Similar and contiguous habitat is found within Site H-17A and its study area. [Burrowing owls are also known to be present throughout Santa Catalina Island, which includes the vicinity of sites BJM, DPK, and TWR. Site DPK is located in rolling grassland, while sites BJM and TWR are in mountainous terrain, less conducive to burrowing owls.](#)

Page 3-148; Section 3.3.4.1

In the discussion of construction impacts to raptors, the first paragraph on Page 3-148 is hereby amended to the following:

Burrowing owls typically remain in the vicinity of their burrows and would be more susceptible to disturbance or destruction; impacts to burrowing owl from construction at proposed Project [Site sites BJM, DPK, H-17A, or TWR](#) would be significant.

Page 3-154; Section 3.3.4.1

The introductory impact analysis for the Santa Catalina Island Fox is hereby amended as follows:

The Santa Catalina Island fox ~~typically is found in dense shrubby vegetation; however, it has been observed using all habitat types present on Santa Catalina Island and could be found anywhere on the island—grasslands, shrublands, coastal marshes, and forests.~~ is a habitat generalist and is found throughout Catalina Island in all natural habitats and areas of human habitation and development. The fox is omnivorous, eating fruits, insects, birds, eggs, crabs, lizards, and small mammals. Individual foxes tend to move about rather than travel in packs. The fox is generally nocturnal, with peaks of activity at dawn and dusk; it is not intimidated by humans. Santa Catalina Island foxes give birth to young in simple dens, under shrubs, or in the sides of ravines (Laughrin 1973). Young ~~are born from early to~~ can be born any time from late February through late April after a gestation period of approximately 50 to 53 days. Litter size ranges from one to five kits (Moore and Collins 1995).

Major threats to the fox ~~have been canine distemper~~ have been disease outbreaks (e.g., the canine distemper outbreak in the late 1990s that almost wiped out the population), mortality from vehicle collisions or other dangers associated with human development (e.g., drowning in open containers of liquids, poisoning, becoming trapped in open excavations), and predation by golden eagles; however, no golden eagles have been seen on the island since the mid-1980s (Catalina Island Conservancy 2015). Though none of the three proposed Project sites on Santa Catalina Island (BJM, DKP, and TWR) are within what may be considered preferred fox habitat, the area surrounding each of these three sites could be occupied by foxes. Catalina Island foxes could be expected at all three sites and would be expected to investigate any changes to the sites during active construction, including open holes and trenches, open containers of liquids, and food wastes.

Page 3-157; Section 3.3.4.1

The impact analysis for small animals is hereby amended as shown in the following sentence:

...Potentially suitable habitat for one or more of these species is assumed to be found within 14 study areas (see **Table 3.3-7.**), with the coast horned lizard and California mountain kingsnake potentially occurring within multiple locations (12 study areas and ~~3~~ 4 study areas, respectively)...

Page 3-157 and 3-158; Section 3.3.4.1

In the discussion of construction impacts to small animals, the second and third paragraphs are hereby amended to the following:

There would be no impact to Townsend’s big-eared bat or western mastiff bat due to construction-related impacts at sites BJM, DPK, and TWR. ~~and OAT,~~

Construction-related impacts to coast horned lizard, California mountain kingsnake, San Diego woodrat, and Tehachapi pocket mouse would be less than significant at sites BJM, CPK, ENT, FTP, H-17A, H-69B, LACFCP11, MMC, MTL2, RIH, SPN, TOP, and TPK.

Page 3-158; Section 3.3.4.1

In the discussion of operational impacts to small animals, the second and third paragraphs are hereby amended to the following and the introduction to the mitigation measures is also amended:

Bat mortality is not a concern due to new towers being added to any site or addition of lighting. Bats may be attracted to the lights for insect foraging; but strikes are not anticipated as all parts of the towers will be stationary and not mobile, thus allowing the bats to navigate safely around the structures. There would be no impact to Townsend’s big-eared bat or western mastiff bat due to operational activities at sites BJM, ~~DPK, and OAT,~~ and TWR.

Operations-related impacts to coast horned lizard, California mountain kingsnake, San Diego woodrat, and Tehachapi pocket mouse would be less than significant at sites BJM, CPK, ENT, FTP, H-17A, H-69B, LACFCP11, MMC, MTL2, RIH, SPN, TOP, and TPK.

Mitigation Measures

The following mitigation measures would be implemented for California mountain kingsnake, coast horned lizard, San Diego woodrat, and Tehachapi pocket-mouse at proposed Project sites BJM, CPK, ENT, FTP, H-17A, H-69B, LACFCP11, MMC, MTL2, RIH, SPN, TOP, and TPK (see Table 3.3-7) (mitigation measures previously described are listed by name only):

Page 3-159; Section 3.3.4.1

The first paragraph of post-mitigation impact analysis for small animals is hereby amended as follows:

Though impacts to California mountain kingsnake, coast horned lizard, San Diego woodrat, and Tehachapi pocket-mouse at proposed Project sites would be less than significant without application of mitigation measures, these measures would still apply at these sites regardless of the level of significance and would further reduce the already less than significant impacts at sites BJM, CPK, ENT, FTP, H-17A, H-69B, LACFCP11, MMC, MTL2, RIH, SPN, TOP, and TPK. Since there would be no impact to Townsend’s big-eared bat or western mastiff bat, no mitigation measures for these species apply to Project sites BJM, ~~DPK, and OAT,~~ and TWR.

Page 3-192; Table 3.3-10

Table 3.3-10 is hereby amended as follows:

Table 3.3-8: Plans and Relevant Land Use Designations for Protection of Biological Resources

Site	Local Plans Affecting Biological Resources	HCP/NCCP
BJM	Santa Catalina Island Local Coastal Program (CRA)	N/A
DPK	Santa Catalina Island Local Coastal Program (CRA)	N/A
TWR	Santa Catalina Island Local Coastal Program (CRA)	N/A

Pages 3-218 to 3-221 and Page 3-235, Table 3.3-12

The special status species associated with Sites BJM, DPK, and TWR, as listed in Table 3.3-12, are hereby amended as follows

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
BJM	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 17 Raptor Protection BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 20 Santa Catalina Island Fox Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
	bald eagle (<i>Haliaeetus leucocephalus</i>)	LM	
	burrowing owl (<i>Athene cunicularia</i>)	LM	
	California dissantherium (<i>Dissantherium californicum</i>)	LM	
	island rush-rose (<i>Crocانthemum greenei</i>)	LM	
	round-leaved filaree (<i>California macrophylla</i>)	LM	
	Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	LM	
	Santa Cruz Island rockcross (<i>Sibara filifolia</i>)	LM	
	Townsend's big-eared bat (<i>Corynorhinus townsendii</i>)	NI	
	Wallace's nightshade (<i>Solanum wallacei</i>)	LM	
	migratory birds (including Island loggerhead shrike, San Clemente spotted towhee, and Hutton's vireo)	LM	
Local Policies - Santa Catalina Island Local Coastal Plan	LM		
DPK	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 17 Raptor Protection BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 20 Santa Catalina Island Fox Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation
	bald eagle (<i>Haliaeetus leucocephalus</i>)	LM	
	burrowing owl (<i>Athene cunicularia</i>)	LM	
	island rush-rose (<i>Crocانthemum greenei</i>)	LM	
	Santa Catalina Island bedstraw (<i>Galium catalinense</i> ssp. <i>catalinense</i>)	LM	
	Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	LM	
	Santa Cruz Island rockcross (<i>Sibara filifolia</i>)	LM	
	migratory birds (including Island loggerhead shrike, San Clemente spotted towhee, and Hutton's vireo)	LM	

	Local Policies - Santa Catalina Island Local Coastal Plan	LM	<ul style="list-style-type: none"> BIO MM 24 Special Status Plants Surveys and Protection
TWR	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 17 Raptor Protection BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 20 Santa Catalina Island Fox Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
	bald eagle (<i>Haliaeetus leucocephalus</i>)	LM	
	burrowing owl (<i>Athene cunicularia</i>)	LM	
	decumbent goldenbush (<i>Isocoma menziesii</i> var. <i>decumbens</i>)	LM	
	island rush-rose (<i>Crocyanthemum greenii</i>)	LM	
	Lyon's pentachaeta (<i>Pentachaeta lyonii</i>)	LM	
	round-leaved filaree (<i>California macrophylla</i>)	LM	
	Santa Catalina Island bedstraw (<i>Galium catalinense</i> ssp. <i>catalinense</i>)	LM	
	Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	LM	
	Wiggins' cryptantha (<i>Cryptantha wigginsii</i>)	LM	
	migratory birds (<u>including Island loggerhead shrike, San Clemente spotted towhee, and Hutton's vireo</u>)	LM	
Local Policies - Santa Catalina Island Local Coastal Plan	LM		

Page 3-327; following Section 3.3.4.1

A new Section 3.3.4.2 is hereby added to state the following:

3.3.4.2 No Project Alternative

Under the No Project Alternative, the proposed Project sites would not be developed as communications sites. As a result, no biological resources would be affected by implementation of this alternative

Page 3-319, Table 3.4-3

Table 3.4-3 is hereby amended to add a footnote for Sites BJM, DPK, and TWR, as follows:

Table 3.4-9. Proposed Project Sites by Impact Level – Archaeological and Architectural Resources

Impact Level	No Historical Resources impacted	Less Than Significant Impacts	Adverse Impacts Mitigated to Less than Significant Levels	Significant and Unavoidable Impacts
Sites	AGH**, AJT, ASD, BJM***, CPK, DPK***, ENT**, FTP, GRM, H-17A, LACF072, LARICSHQ, LEPS**, MMC, OAT, PDC, PHN, RIH, SDW, SGH, SIM, SPN, TPK, TWR***, VPK, WS1	BUR*, BUR1*, BUR2*, BUR3*, FRP*, GMT*, JOP*, JPK*, JPK2*, LACFCP11*, MML*, MTL2*, PMT*, SUN*, SUN2*, TMT*, WMP*, WTR*	PASPD01, PWT*, WAD, ENC1, TOP, ZHQ	H-69B, LACFCP08*, LACFCP09*, LPC*
<p>* Proposed Project sites on federal lands require consultation and coordination with the appropriate federal agency.</p> <p>** Based on records searches and field surveys, there are no archaeological sites within the direct APE of this project site and there would be no impacts; however, a monitor would be present during ground disturbing activities at the request of the Soboba Band of Luiseño Indians.</p> <p>*** Based on records searches and field surveys, no archaeological sites are within the direct APE of this project site and there would be no impacts; however, a monitor would be present during ground-disturbing activities at the request of the Catalina Island Conservancy.</p>				

Page 3-350; Section 3.5.4.1

Mitigation measures GEO MM 1 is hereby amended as follows:

GEO MM 1 Prior to or concurrently with submittal of the application for a building permit for any portion of the proposed Project site, the ~~project sponsor~~ [Contractor](#) shall:

Page 3-372; Table 3.7-4: Proposed Project Sites with Low Potential to Encounter Recognized Environmental Concerns during Intrusive Site-Related Activities

A typographical error in the address for Site SGH is hereby corrected as follows:

Table 3.7-10: Proposed Project Sites with Low Potential to Encounter Recognized Environmental Concerns during Intrusive Site-Related Activities

Site ID	Site Name	Address
SGH	Signal Hill	2321 Stanley Ave, Signal Hills CA 90755



Pages 3-385 and 3-389; Section 3.7.4.1

Mitigations measures HAZ MM 1 and HAZ MM 3 are hereby amended as follows:

HAZ MM 1 Prior to construction activity, the construction contractor ~~must~~shall prepare a Phase I Environmental Site Assessment meeting the standards outlined in the American Society for Testing Materials (ASTM), Practice for Limited Environmental Due Diligence: Transaction Screen Process E 1528.

HAZ MM 3 Fire Management Plan. Prior to construction activity, the Authority ~~must~~shall work with the agency responsible for fire protection in the jurisdiction where the site is located to develop and implement a fire management plan for use during construction activity. The plan will identify project locations, project descriptions, anticipated construction activities, limitation of activities during periods of elevated fire risk (e.g., “red flag” days), level of suppression equipment required on site, training requirements, and points of contact.

Page 3-427, Section 3.9.4.1

Text describing the Santa Catalina Island Local Coastal Plan is hereby amended as follows:

The *Santa Catalina Island Local Coastal Plan* was approved by the Los Angeles County Board of Supervisors on March 15, 1983, and was certified by the CCC on November 17, 1983. [The plan is codified in the Los Angeles County Code at Sections 22.46.050 through 22.46.750.](#)

Page 3-434 – 3-442, Table 3.9-4: Planning and/or Zoning Designations for Proposed Project Sites

Table 3.9-4 is hereby amended as follows:

Site ID	Site Name	General Plan Name	General Plan Designation	Zoning Designation	Height Restriction	Inconsistent with Plans or Policies
AGH	Agoura Hills	City of Agoura Hills General Plan Update Los Angeles County General Plan 2035	Open Space Deed Restricted	Open Space Deed Restricted	60 feet <u>Not allowed in Open Space Deed Restricted zone</u>	Yes, exceeds height restriction by up to 10 feet⁴ <u>prohibited use in Open Space Deed Restricted zone¹</u>
AJT	AeroJet	City of Chino Hills Draft 2014 General Plan Update Los Angeles County General Plan 2035	Undesignated	Rural Residential	70 <u>35 feet</u>	No



Site ID	Site Name	General Plan Name	General Plan Designation	Zoning Designation	Height Restriction	Inconsistent with Plans or Policies
WAD	Walker Drive	City of Beverly Hills General Plan Los Angeles County General Plan 2035	Single Family Residential – Low Density	One-Family Residential Zone Parks, Reservoirs, Government (Unzoned)	N/A	Inconsistent with County plan

Page 3-444; Section 3.9.4.1

The discussion of construction impact for question LU-1 is hereby amended as follows:

As indicated in Table 3.9-4, a review of city and county general plans and zoning ordinances indicate that Sites ~~AGH~~, FTP, H-17A, JPK, JPK2, LEPS, MMC, PASPD01, and SDW are inconsistent with local zoning ordinances regarding height restrictions. Site AGH is inconsistent with the Open Space Deed Restricted zoning, which is designated to set aside natural open space by restricting development. Additionally, Sites JPK and JPK2...

Pages 3-460 and Page 3-470, Table 3.10-2; Summary of Local Regulations

Table 3.10-2 is hereby amended for selected sites, as follows

Site ID(Name)	Jurisdiction		Noise Ordinance	Noise Level Threshold	Noise Restrictions	Vibration Restrictions
	City	County				
AGH(Agoura Hills)	Agoura Hills	Los Angeles	<p>City of Agoura Hills; Article IX - Zoning; Chapter 6 - Regulatory Provisions, Part 2 - Special Regulations; Division 6 - Noise Regulations.</p> <p>City of Agoura Hills 2035 General Plan Update.</p>	<p>None specified General Plan Community Noise Equivalent Levels:</p> <p>Table N-1 Land Use Compatibility (Residential)</p> <p>Zone A (clearly compatible) < 60 Dba CNEL</p> <p>Zone B (normally compatible) 60 – 70 dBA CNEL</p> <p>Zone C (normally incompatible) 70 – 75 dBA CNEL</p> <p>Zone D (clearly incompatible) > 75 dBA CNEL</p> <p>Table N-2 Interior/Exterior Standards(Residential)</p> <p>Interior 45 dBA CNEL</p> <p>Exterior 55 dBA CNEL</p>	<p>Work must not occur between 8:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or at any time on Sunday or a legal holiday.</p>	<p>See noise restrictions</p>
SGH (Signal Hill)	Signal Hill	Los Angeles	<p>City of Signal Hill, California, Municipal Code, Title 9 Public, Peace, Morals and Welfare, Chapter 9.16</p>	<p>none specified</p>	<p>No person shall carry on any construction activities, including the erection, demolition, excavation, modification, alteration or repair of any building or structures, or any other activities creating construction noise as defined in this section other than between the hours of seven a.m. and six</p>	<p>See noise restrictions</p>

Site ID(Name)	Jurisdiction		Noise Ordinance	Noise Level Threshold	Noise Restrictions	Vibration Restrictions
	City	County				
			Noise		<p>p.m. on weekdays, except as otherwise permitted in this section. It is the purpose of this section to promote quiet and peaceful residential areas by limiting construction activities which create disturbing noise to reasonable times and circumstances, but such limitations shall not apply where residences will not be affected, where individual homeowners are performing maintenance work, or to emergency circumstances.</p> <p><u>Per Chapter 9.16.060 of the Municipal Code, machinery and other equipment, including air conditioning units, generators, etc. operating for more than 5 minutes cannot exceed the ambient noise level at the property line. The daytime (7 a.m. to 10 p.m.) and nighttime (10 p.m. to 7 a.m.) ambient noise level for residential areas prescribed in Chapter 9.16.020 of the Signal Hill Municipal Code are 60 dbA and 50 dbA, respectively.</u></p>	

Page 3-516; Section 3.12.2.3

The discussion of Signal Hill Circulation Element, Scenic Routes is hereby amended as follows:

City of Signal Hill General Plan (2009)

Circulation Element, Scenic Routes – designates a series of roadways at higher elevations as scenic routes. [Skyline Drive, located immediately south of the project site, is a designated scenic route.](#)

Page 4-12, Site AGH

Site AGH, Question BIO-2, Mitigation Measure(s) is hereby amended as follows:

Mitigation Measure(s):

~~Minimize disturbance to natural vegetation; do not remove California walnut trees. Prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Use caution to minimize the use of heavy equipment near (within the dripline) walnut trees to protect the plant's root system.~~ Required Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management • BIO MM 23

Page 4-28, Site AGH

Site AGH, Land Use Planning Setting, zoning height restriction question and the second paragraph in the discussion for Question LU-1 are hereby amended as follows:

What is the zoning height restriction, if any?: ~~60-feet~~ [Development is limited to passive recreational facilities; height restriction for this zone is not identified.](#)

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Discussion:

Based on the zoning ordinances for this site, ~~the maximum allowable height of structures in this area is 60-feet~~ [development is limited to passive recreational facilities \(such as parks and trails\) with a conditional use permit.](#)

Page 4-64, Site AJT

Site AJT, Land Use Planning Setting, zoning height restriction question is hereby amended as follows:

What is the zoning height restriction, if any?: ~~70~~ [35](#) feet

Page 4-113, Site BJM

The Site BJM Aesthetic Setting section is hereby amended as follows:

State, regional, or municipal recreation area: ~~No~~-Yes

If yes, enter recreation area name: ~~N/A~~ [Catalina Island Conservancy Open Space Easement](#)

Page 4-121, Site BJM

For Site BJM, Biology Setting, the discussion for special status animals recorded within 1 mile, special status plants recorded within 1 mile, and species or habitat present in Project vicinity (generally within 500 Feet) is hereby amended as follows:

Special Status Animals Recorded within 1 Mile:

[California mountain kingsnake \(*Lampropeltis zonata*; CDFW-SSC, USFS-Sens\)](#); Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T); Townsend's big-eared bat (*Corynorhinus townsendii*; CA-PT; CDFW-SSC); two-striped garter snake (*Thamnophis hammondi*; CDFW-SSC); groundfish (M&FEFH).

Special Status Plants Recorded within 1 Mile:

beach spectaclepod (*Dithyrea maritima*; CA-T, 1B.1); [bobtail barley \(*Hordeum intercedens*, 3.2, SCI\)](#); [California adderstongue \(*Ophioglossum californicum*; 4.2, SCI\)](#); California dissanthelium (*Dissanthelium californicum*; 1B.2); Catalina crossosoma (*Crossosoma californicum*; 1B.2); [climbing bedstraw \(*Galium nuttallii* ssp. *insulare*; 4.3, SCI\)](#); [Coulter's saltbush \(*Atriplex coulteri*; 1B.2\)](#); [island ceanothus \(*Ceanothus megacarpus* var. *insularis*; 4.3, SCI\)](#); [island Jepsonia \(*Jepsonia malvifolia*; 4.2, SCI\)](#); [island live oak \(*Quercus tomentella*; 4.2, SCI\)](#); [island pitchersage \(*Lepechinia fragrans*; 4.2, SCI\)](#); [island poppy \(*Eschscholzia ramosa*; 4.3, SCI\)](#); island rush-rose (*Crocanthemum greeni*; ESA-T, 1B.2); [Nevin's gilia \(*Gilia nevinii*; 4.3, SCI\)](#); roundleaved filaree (*California macrophylla*; 1B.1); Santa Catalina figwort (*Scrophularia villosa*; 1B.2); [Santa Catalina Island bedstraw \(*Galium catalinense* ssp. *catalinense*; 1B.3\)](#); [Santa Catalina Island buckwheat \(*Eriogonum giganteum* var. *giganteum*; 4.3, SCI\)](#); Santa Catalina Island currant (*Ribes viburnifolium*; 1B.2); Santa Catalina Island ironwood (*Lyonothamnus floribundus* ssp. *floribundus*; 1B.2); Santa Catalina Island manzanita (*Arctostaphylos catalinae*; 1B.2); Santa Cruz Island wingedrock cress (*Sibara filifolia*; ESA-E, 1B.1); south island bush-poppy (*Dendromecon harfordii* var. *ramnoides*; 3.1); Wallace's nightshade (*Solanum wallacei*; 1B.1); [western dichondra \(*Dichondra occidentalis*; 4.2, SCI\)](#).

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

[burrowing owl \(*Athene cunicularia*; CDFW-SSC\)](#); [California mountain kingsnake \(*Lampropeltis zonata*; CDFW-SSC, USFS-Sens\)](#); Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T); Townsend's big-eared bat – foraging (*Corynorhinus townsendii*; CA-PT); bald eagle (*Haliaeetus leucocephalus*; CA-E, CDFW-FP, USFS-S); groundfish (M&FEFH); [Coulter's saltbush \(*Atriplex coulteri*; 1B.2\)](#); dissanthelium (*Dissanthelium californicum*; 1B.2); round-leaved filaree (*California macrophylla*; 1B.1); [Santa Catalina Island bedstraw \(*Galium catalinense* ssp. *catalinense*; 1B.3\)](#); Santa Cruz Island winged-rock cress (*Sibara filifolia*; ESA-E, 1B.1); round-leaved filaree (*California macrophylla*; 1B.1); island rush-rose (*Crocanthemum greeni*; ESA-T, 1B.2); Wallace's nightshade (*Solanum wallacei*; CNPS-1B.1)

Page 4-125, Site BJM

Impact analysis for Impact CUL-1 is hereby modified as follows:

Mitigation Measure(s):

~~None required~~ [CUL MM 1](#)

Page 4-335, Site DPK

Site DPK, Project Description, address is hereby amended as follows:

Address: ~~Avalon Canyon Rd.~~ [Divide Road](#)

Page 4-338, Site DPK

The Site DPK Aesthetic Setting section is hereby amended as follows:

State, regional, or municipal recreation area: ~~No~~ [Yes](#)

If yes, enter recreation area name: ~~N/A~~ [Catalina Island Conservancy Open Space Easement](#)

Page 4-345, Site DPK

For Site DPK, Biology Setting, the discussion for special status animals recorded within 1 mile, special status plants recorded within 1 mile, and species or habitat present in Project vicinity (generally within 500 Feet) is hereby amended as follows:

Special Status Animals Recorded within 1 Mile:

aphanisma (*Aphanisma blitoides*; 1B.2); beach spectaclepod (*Dithyrea maritima*; CA-T, 1B.1); [bright green dudleya \(*Dudleya virens* ssp. *insularis*; 1B.2, SCI\)](#); [bobtail barley \(*Hordeum intercedens*, 3.2, SCI\)](#); [California adderstongue \(*Ophioglossum californicum*; 4.2, SCI\)](#); California dissanthelium (*Dissanthelium californicum*; 1B.2); Catalina crossosoma (*Crossosoma californicum*; 1B.2); chaparral ragwort (*Senecio aphanactis*; 2B.2); coast woolly-heads (*Nemacaulis denudata* var. *denudata*; 1B.2); Coulter's saltbush (*Atriplex coulteri*; 1B.2); Davidson's saltscale (*Atriplex serenana* var. *davidsonii*; 1B.2); [island ceanothus \(*Ceanothus megacarpus* var. *insularis*; 4.3, SCI\)](#); island green dudleya (*Dudleya virens* ssp. *insularis*; 1B.2); [island Jepsonia \(*Jepsonia malvifolia*; 4.2, SCI\)](#); [island live oak \(*Quercus tomentella*; 4.2, SCI\)](#); [island poppy \(*Eschscholzia ramosa*; 4.3, SCI\)](#); island rush-rose (*Crocyanthemum greenei*; ESA-T, 1B.2); Nevin's woolly sunflower (*Constancea nevinii*; 1B.3); round-leaved filaree (*California macrophylla*; 1B.1); Santa Catalina figwort (*Scrophularia villosa*; 1B.2); Santa Catalina Island bedstraw (*Galium catalinense* ssp. *catalinense*; 1B.2); [Santa Catalina Island buckwheat \(*Eriogonum giganteum* var. *giganteum*; 4.3, SCI\)](#); Santa Catalina Island currant (*Ribes viburnifolium*; 1B.2); Santa Catalina Island desert-thorn (*Lycium brevipes* var. *hasse*; 1B.1) ; Santa Catalina Island ironwood (*Lyonothamnus floribundus* ssp. *Floribundus*; 1B.2); Santa Catalina Island manzanita (*Arctostaphylos catalinae*; 1B.2); Santa Catalina Island monkeyflower (*Mimulus traskiae*; 1A); Santa Cruz Island winged-rockcress (*Sibara filifolia*; ESA-E, 1B.1);

showy island snapdragon (*Gambelia speciosa*; 1B.2); south coast saltscale (*Atriplex pacifica*; 1B.2); [south island bush-poppy \(*Dendromecon harfordii* var. *rhamnoides*; 3.1\)](#); Wallace's nightshade (*Solanum wallacei*; 1B.1); [western dichondra \(*Dichondra occidentalis*; 4.2, SCI\)](#).

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

[burrowing owl \(*Athene cunicularia*; CDFW-SSC\)](#); Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T); Townsend's big-eared bat – foraging (*Corynorhinus townsendii*; CA-CT; CDFW-SSC); bald eagle (*Haliaeetus leucocephalus*; CA-E, CDFW-FP, USFS-S) island rush-rose (*Crocanthemum greenei*; ESA-T, CNPS-1B.2); Santa Cruz Island winged-rockcress (*Sibara filifolia*; ESA-E, 1B.1)

Page 4-349, Site DPK

Impact analysis for Impact CUL-1 is hereby modified as follows:

Mitigation Measure(s):

~~None required~~ [CUL MM 1](#)

Page 4-1487, Site SGH

Site SGH, Project Description, the city and land owner are hereby amended as follows:

City: ~~Signal Hill~~ [Long Beach](#)

Landowner: GTE California Inc. [and Long Beach City](#)

Page 4-1490, Site SGH

For Site SGH, Aesthetics Setting, the visual description is hereby amended as follows:

Visual Description: The site is located on a hilltop within a gated residential community, [approximately 200 feet north of Skyline Drive. The 2009 City of Signal Hill General Plan Circulation Element identifies Skyline Drive as a scenic route \(City of Signal Hill 2009\). The plan notes that ‘The entire route provides views of urban Southern California, the ocean, and the downtown Long Beach skyline. The site consists of an elongated concrete surface ...](#) A small park (Sunset View Park) is south of the site and provides views of the distant horizon to the south. This elongated park parallels ~~a road~~ [Skyline Drive](#) and consists of low grasses and shrubs, concrete benches, and a concrete path.

Page 4-1505, Site SGH

For Site SGH, Question GEO-2, Discussion is hereby amended as follows:

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Discussion:

The site is located on flat grade in an urban environment. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the City of ~~Signal Hill~~ [Long Beach](#) planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing storm drains inlets.

Page 4-1514, Site SGH

Site SGH, Land Use Planning Setting, local agency jurisdiction and zoning are hereby amended as follows:

Local Agency Jurisdiction: ~~Signal Hill~~ [City of Long Beach](#)

Zoning: Hilltop Specific Plan District, [Antenna and Microwave Consolidation/Park Site. Note: The Hilltop Area Specific Plan includes view protection provisions, but the City of Signal Hill is not administering permits for the project.](#)

Pages 4-1516 and 4-1517, Site SGH

For Site SGH, Question NOI-1, the fifth paragraph of the discussion is hereby amended as follows:

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Because noise level thresholds have not been established in the local ordinance, a 60 dBA "normally acceptable" community noise equivalent level (CNEL) developed by the California Department of Health Services was referenced in the analysis of the dominant noise source during Project operation, which is HVAC units for equipment shelters. According to the Air Conditioning, Heating, and Refrigeration Institute standards and Project assumptions, noise emissions from the HVAC systems would be approximately 53 dBA CNEL at 20 feet. In addition, emergency diesel generators would operate intermittently, for backup power purposes. Noise from diesel generators operating inside solid enclosures would be 58 dBA CNEL at 21 feet. [In addition, the closest adjacent receiver to the site property line is separated by a 5-foot privacy wall that would provide an additional 5 dBA of noise mitigation and a net 51 dBA at the property line.](#) Noise levels from both sources would be below the 60 dBA "normally acceptable" level. Therefore, operational noise would not exceed any standards established in a local general plan or ordinance, or applicable standards of other agencies.

Page 4-1524, Site SGH

Site SGH, Utilities Setting, nearest solid waste disposal facility is hereby amended as follows:

Nearest Solid Waste Disposal Facility: ~~Savage Canyon Landfill~~ [EDCO Disposal, 2755 California Ave., Signal Hill](#)

Page 4-1802, Site TWR

The Site TWR Aesthetic Setting section is hereby amended as follows:

State, regional, or municipal recreation area: ~~No~~-Yes

If yes, enter recreation area name: ~~N/A~~ Catalina Island Conservancy Open Space Easement

Page 4-1809, Site TWR

For Site TWR, Biology Setting, the discussion for special status animals recorded within 1 mile, special status plants recorded within 1 mile, and species or habitat present in Project vicinity (generally within 500 Feet) is hereby amended as follows:

Special Status Animals Recorded within 1 Mile:

beach spectaclepod (*Dithyrea maritima*; CA-T, 1B.1); bobtail barley (*Hordeum intercedens*, 3.2, SCI); bright green dudleya (*Dudleya virens ssp. hassei*; 1B.2, SCI); California dissanthelium (*Dissanthelium californicum*; 1B.2); Catalina crossosoma (*Crossosoma californicum* ; 1B.2); Catalina Island dudleya (*Dudleya virens ssp. Hassei*; 1B.2); Coulter's saltbush (*Atriplex coulteri*; 1B.2); decumbent goldenbush (*Isocoma menziesii* var. *decumbens*; 1B.2); island buckwheat (*Eriogonum grande* var. *grande*; 4.2, SCI); island Jepsonia (*Jepsonia malvifolia*; 4.2, SCI); island poppy (*Eschscholzia ramosa*; 4.3, SCI); Lyon's pentachaeta (*Pentachaeta lyonii*; ESA-E, CA-E, 1B.1); Nevin's woolly sunflower (*Constancea nevinii*; 1B.3); round-leaved filaree (*California macrophylla*; 1B.1); Santa Catalina figwort (*Scrophularia villosa*; 1B.2); Santa Catalina Island bedstraw (*Galium catalinense ssp. catalinense*; 1B.2); Santa Catalina Island buckwheat (*Eriogonum giganteum* var. *giganteum*; 4.3, SCI); Santa Catalina Island currant (*Ribes viburnifolium*; 1B.2); Santa Catalina Island ironwood (*Lyonothamnus floribundus ssp. floribundus*; 1B.2); showy island snapdragon (*Gambelia speciosa*; 1B.2); western dichondra (*Dichondra occidentalis*; 4.2, SCI); Wiggins' cryptantha (*Cryptantha wigginsii*; 1B.2)

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

burrowing owl (*Athene cunicularia*; CDFW-SSC); Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T); bald eagle (*Haliaeetus leucocephalus*; CA-E, CDFW-FP, USFS-S); groundfish (M&F-EFH); Townsend's big-eared bat – foraging (*Corynorhinus townsendii*; CA-PT; CDFW-SSC); island rush-rose (*Crocantemum greenei*; ESA-T, CNPS-1B.2); Lyon's pentachaeta (*Pentachaeta lyonii*; ESA-E, ESA-CH, CA-E, CNPS-1B.1); round-leaved filaree (*California macrophylla*; CNPS-1B.1); Santa Catalina Island bedstraw (*Galium catalinense ssp. catalinense*; CNPS-1B.2); Santa Catalina Island currant (*Ribes viburnifolium*; 1B.2); Wiggins' cryptantha (*Cryptantha wigginsii*; CNPS-1B.2)

Page 4-1813, Site TWR

Impact analysis for Impact CUL-1 is hereby modified as follows:

Mitigation Measure(s):

~~None required~~ [CUL MM 1](#)

Pages 4-1982 and 4-1983, Site WS1

Site WS1, Question NOI-2, Mitigation Measure(s) is hereby amended as follows:

Mitigation Measure(s):

NOI MM 2

Prior to commencement of construction at site Site WS1, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction noise impacts below the levels specified in the City of Santa Monica noise ordinance. Such measures may include but are not limited to the following:

- Use noise blankets or other muffling devices on equipment and quiet-use generators at noise-sensitive receivers.
- Use well-maintained equipment and have equipment inspected regularly.
- Operate construction equipment for periods of fewer than 15 consecutive minutes when possible.

~~NOI MM 3~~

~~Prior to commencement of construction at any site with an applicable noise ordinance where construction activities are necessary outside the specified hours in the ordinance, the Authority shall apply for and obtain variances from the agency with jurisdiction at that site.~~