



# THE WILDLANDS CONSERVANCY

July 20, 2016

Mr. Kevin White, Project Planner  
San Bernardino County Land Use Services Department  
Planning Division  
385 N. Arrowhead Avenue, First Floor  
San Bernardino, CA 92415-0182

**RE: Project No. P201000215/CF - Radio Tower Application  
Lazer Parcel - APN 0325-011-19-0000  
Draft EIR - SCH No. 2008041082**

Dear Mr. White:

Founded in 1995, The Wildlands Conservancy is dedicated to preserving the beauty and biodiversity of the earth and to providing programs so that children may know the wonder and joy of nature. In working to achieve this mission, TWC has established the largest nonprofit nature preserve system in California, comprised of fifteen preserves encompassing 147,000 acres of diverse mountain, valley, desert, river, and oceanfront landscapes. These preserves are open to the public free of charge for passive recreation, including camping, hiking, picnicking, birding, and so much more.

Ultimately, saving our treasured landscapes from development means educating and instilling a love for nature in future generations. For this reason, TWC is also the state's nonprofit leader in providing free outdoor education opportunities for California youth. Through these programs and our reverent stewardship of preserves—visited by nearly half a million people per year—we foster a love and respect for life in all of its magnificent forms.

TWC has been active for close to 20 years in the Yucaipa and Oak Glen communities promoting conservation values and purchasing land for public enjoyment and open-space purposes. TWC is frequently recognized as a resource in the community relating to open-space issues. Because of this reputation, TWC is specifically mentioned in the Oak Glen Community Plan policies and goals:

- Policy OG/OS 1.2: County is committed to supporting and actively pursuing the expansion of WCSP, including cooperation with open space community groups such as The Wildlands Conservancy and Yucaipa Valley Conservancy.



TWC owns several thousand acres of land in the Oak Glen and Pisgah peak area, and thus has a keen interest in the Lazer radio tower project that may be constructed immediately adjacent to Wildwood Canyon State Park. In reviewing the Draft EIR for the Lazer project, TWC noted that the following project objectives were included relating to Wildwood Canyon State Park:

- Contribute to the expansion of Wildwood Canyon State Park (WCST) through the implementation of a passive, not active, land use. As a passive land-use, broadcast towers have been implemented in many CA State Parks.
- Create long-term buffering of passive land uses within and adjacent to the eastern WCSP boundary through dedication of development rights and/or transfer of ownership in fee of close to 4% of the current WCSP land area.

As one of the two Conservancy's specifically mentioned in the Oak Glen Community Plan policy OG/OS 1.2, TWC feels an obligation to comment on these supposed "goals" of the Lazer tower project. TWC has consistently opposed the Lazer radio tower, because that radio tower is incompatible with the surrounding open spaces of Wildwood Canyon State Park, as well as other lands owned by open-space conservancies, including TWC. Having monitored the Lazer tower project since 2008, it is clear that the goal of the project is to expand coverage of Lazer's radio station, regardless of broad and vast community opposition to the project where over 17,000 citizens wrote letters or signed petitions in opposition to this radio tower project.

TWC does not believe Lazer's business desire is to expand the audience of its radio tower into a supposed "goal" of expanding Wildwood Canyon State Park. It is clear to TWC that rather than facilitating expansion of the park, the radio tower will actually prevent it. It is our understanding that Yucaipa Valley Conservancy and Citizens for the Preservation of Rural Living own property in the surrounding area, which they intend to eventually dedicate as open-space and incorporate into the Wildwood Canyon State Park. However, by building a radio tower, equipment shed, fencing, and parking space in the middle of these open-space lands, that expansion of the park will be marred by the radio tower project. It is inconceivable to understand how Lazer and/or the County could take the position that constructing a radio tower and associated facilities in any way helps to expand Wildwood Canyon State Park. The fact that Lazer is proposing to provide an open-space easement over the area of their property surrounding the radio facilities does not in any way facilitate expansion of the park. The radio tower emits radiofrequency waves, which are considered dangerous and should not be in the middle of a state park. In addition, the radio tower and equipment constitute blight on the scenic views from Wildwood Canyon State Park and TWC's Oak Glen Preserve.

The draft EIR recognizes that the baseline condition of the Lazer Project is the condition of the project prior to Lazer carving out a 650-foot trail from Pisgah peak road down to the proposed site of the radio tower. That 650-foot trail alone constitutes a significant adverse aesthetic impact to the scenic views from Wildwood Canyon State Park and surrounding open-space properties. The draft EIR purports to completely mitigate this significant aesthetic damage with the following:

- Mitigation Measure AES – 2: The Project Proponent shall revegetate the portion of the ridge where the demonstration poll was placed. During placement of the demonstration poll and conducting geotechnical field testing, vegetation was removed. The scraped area, which appears in the form of a line down the slope, and any other areas that may be disturbed during site development shall be revegetated at the direction of the County - approved biologist prior to issuance of occupancy permits.

TWC has protected over 1250 square miles of open space land and manages more than 200 square miles of land throughout the State of California. TWC has been involved in extensive work involving restoration of deserts, wetlands, rivers, forests and other sensitive wildlife habitat. Because of this extensive work involving restoration of a wide variety of habitat, TWC believes they are an expert in analyzing effective versus ineffective restoration of damaged habitat.

Based upon TWC's extensive experience with restoration of habitat, it is our opinion that the proposed mitigation measure requiring revegetation of the approximate 650-foot trail down the side of the slope on the Lazer Property will very likely be unsuccessful. In the immediate area of Pisgah Peak, several years ago an owner of a property illegally graded the top of a peak leaving a scar on the mountaintop. Attempts were made to revegetate that property, but they were unsuccessful. In this case, due to the lack of any method of watering, drought conditions, and erosions when there is hard rain despite the drought, it is unlikely that the vegetation will successfully root and cover the scar left by the foot trail down the slope. In any event, if the revegetation was eventually successful, it is likely that it could take 5 to 10 years before the revegetation would cover the scar caused by scraping of the footpath trail. As a result, the visual impact of the scraping of the foot trail will be visible for many years. Based on our experience, the analysis in the Draft EIR that revegetation of the scarred foot trail will be fully mitigated by revegetation is not entirely accurate and should not be relied upon.

TWC continues to support the opposition to the Lazer Radio project from thousands of local residents, visitors, tourists, City of Yucaipa, Yucaipa Valley Conservancy, and the Citizens for the Preservation of Rural Living.

Very truly yours,



Dana Rochat  
Acquisitions Director

Cc: Supervisor James Ramos, County of San Bernardino  
Mayor Denise Hoyt, City of Yucaipa  
Mr. John Mirau, Citizens for Preservation of Rural Living  
Mr. David Miller, Yucaipa Valley Conservancy