



San Bernardino Valley Audubon Society

P. O. Box 10973, San Bernardino, California 92423-0973

March 30, 2008

County of Riverside
Department of Facilities Management
P. O. Box 789
Riverside CA 92502-0789

ATTN: Ms. Ashley Mitchell

By email to EIR@co.riverside.ca.us

SUBJECT: Comments on Notice of Preparation Public Safety Enterprise Communication (PSEC) Project

Dear Ms. Mitchell:

These comments on the above project are made on behalf of the San Bernardino Valley Audubon Society (SBVAS), a chapter of the National Audubon Society. Our mission is to help educate the public as to the importance of the natural environment, and to preserve habitat for birds and other wildlife. In spite of our name, our chapter area covers almost all of Riverside and San Bernardino Counties and specifically includes almost all the areas of the above referenced project. We have about 2,000 members, with about half of them living in Riverside County.

SBVAS applauds the notion in general that this project will markedly improve communications for the County's various public safety organizations. Having served as a university's liaison to local police and fire departments, I am personally aware of the importance of sound, reliable communications systems to and between these organizations.

Having said that, we have some concerns about some of the proposed locations. They appear to be located in areas of sensitive or possibly critical habitat for wildlife and or are areas whose scenic beauty would be harmed by the presence of a communications tower. Regarding habitat, we are concerned about the project at all levels: initial siting, construction, and on-going maintenance. While "mitigation" measures may be undertaken to minimize environmental damage, when a tower is completed, it will need to be maintained and will have an access road. Unfortunate experience has shown that such roads increase unauthorized vehicular traffic, private dumping, and vandalism. Alternative sites should be suggested and evaluated on these points.

The sites of particular concern are:

- Timoteo
- Ranger Peak
- Santa Rosa Peak
- El Cariso
- Santiago Peak



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- Cottonwood
- Black Eagle

We are an all volunteer organization and only had the time to individually investigate one of these sites, Cottonwood. While our specific comments on Cottonwood are given below, the County should examine the issues we have raised for all sites planned, and specifically for the sites named above.

Regarding Cottonwood, placing a relay tower at there, inside Joshua Tree National Park, seems to be a terrible idea. It is impossible to tell from the maps provided exactly where the tower would be placed, but there really is nowhere within the Park that would be acceptable. The Cottonwood area is the most heavily used area in the southern half of the Park. The Cottonwood Visitors' Center is the introduction to the Park for thousands of visitors yearly, and the nearby Cottonwood Oasis is one of the few locations in the Park with permanent water, and offers an important local stopover for migrating birds. The very popular Lost Palms Trail leads from Cottonwood southeast for about four miles, and is famous for spring wildflowers. Rock climbers also frequently use this area, along with day hikers and backcountry campers. There is a well-attended campground at Cottonwood as well. Joshua Tree National Park was established as an outstanding desert destination for people seeking solitude and untrammelled desert vistas. A viewscape untouched by man-made features is essential to the Joshua Tree experience. As an alternative, we suggest Chiriaco Summit, a small settlement along Interstate 10, about 9 miles from Cottonwood.

Sincerely,

[signed]

Drew Feldmann
Chapter president