

SANTA MONICA MOUNTAINS CONSERVANCY

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April 23, 2012

Bureau of Engineering
Attention: Allan Kawaguchi
City of Los Angeles Department of Public Works
1149 South Broadway Street, Suite 820
Los Angeles, California 90015

**Proposed Mount Lukens and Verdugo Peak Communications Towers
Environmental Review**

Dear Mr. Kawaguchi:

The Santa Monica Mountains Conservancy's (Conservancy) jurisdiction includes both Mount Lukens in the San Gabriel Mountains and Verdugo Peak in the Rim of the Valley Trail Corridor Zone pursuant to Section 33105 of the Public Resources Code.

Both of the proposed towers are within the close viewsheds of regionally significant trails that traverse large blocks of permanent public open space. The proposed Verdugo Peak Tower is located just one-tenth of a mile south of the Conservancy's 1200-acre La Tuna Canyon Park and it abuts the Verdugo Motorway which is the only trail that ties together the eastern and western portions of the Verdugo Mountains. The proposed Mount Lukens Tower would be exactly one hundred feet from the Rim of the Valley Trail (Mount Lukens Road) on the north and less than five hundred feet from a descending section of the trail to the southwest.

The proposed 110-foot-tall Mount Lukens tower is proposed to be located at the west edge of a large antennae farm on the peak. The Conservancy requests that your Department prepare and circulate a visual impact study of this proposed tower location with a concentration on a 1500-foot-long trail section beginning west of the site on Pigpen Spur Road (Stone Canyon Trail) leading directly up to the tower on Mount Lukens Road. To effectively disclose the tower's potential adverse visual impacts, a scaled image of the tower must be superimposed into the study photographs. We request that that visual impact study be included in the circulated CEQA review document. The CEQA review document should include detailed mitigation measures for any substantial adverse impacts to viewsheds on the subject trail section and any other portion of the Rim of the Valley Trail. The CEQA

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review document should also address any potential adverse ecological impacts to American condors. We formally request that the CEQA document circulation period be no less than 30 days.

The proposed 180-foot-tall Verdugo Peak tower is proposed next to a 75-foot-tall radio tower. Well placed Google Earth ground photographs show this significantly shorter tower as part of the viewshed both from the Zig Zag trail that connects to Wildwood Canyon Park and the Verdugo Motorway. The Conservancy requests that your Department prepare and circulate a visual impact study of this proposed tower location with a concentration on the viewshed from the Zig Zag trail and the Verdugo Motorway. To effectively disclose the tower's potential adverse visual impacts, a scaled image of the tower must be superimposed into the study photographs.

We request that that visual impact study be included in the circulated CEQA review document. The CEQA review document should include detailed mitigation measures for any substantial adverse impacts to viewsheds on the subject trail sections or of any other trail viewshed found to be relevant. The CEQA review document should also address any potential adverse ecological impacts to American condors. We formally request that the CEQA document circulation period be no less than 30 days.

Please address any questions and all future correspondence to Paul Edelman of our staff at the above letterhead address, by phone at (310) 589-3200 ext. 128, and by email at edelman@smmc.ca.gov.

Sincerely,

ELIZABETH A. CHEADLE
Chairperson