



Objection to:

**San Gabriel Mountains National Monument Management Plan
Draft Decision Notice and Finding of No Significant Impact
Final Environmental Assessment
April 2018 (Los Angeles Times Legal Notice dated April 20, 2018)**

Responsible Official:

**Rachel Smith, Acting Forest Supervisor
Angeles National Forest
San Gabriel Mountains National Monument**

Reviewing Officer:

**Mr. Bernie Gyant, U.S. Forest Service Region 5
1325 Club Drive, Vallejo, CA 94592**

Via email: objections-pacificsouthwest-regional-office@fs.fed.us

Objection filed by:

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Signed:

A handwritten signature in black ink, appearing to read "SEVANS", written over a horizontal line.

Steven L. Evans
June 4, 2018

STANDING

California Wilderness Coalition (CalWild) hereby files this timely objection to the San Gabriel Mountains National Monument (SGMNM) Management Plan, Draft Decision Notice and Finding of No Significant Impact, Final Environmental Assessment (FEA), dated April 2018.

CalWild has standing to file this objection because we submitted timely comments in response to the SGMNM draft plan on Nov. 1, 2016 and timely scoping comments (in conjunction with San Gabriel Mountains Forever, now Nature 4 All) in preparation for the draft plan on August 11, 2015. CalWild was also involved in the establishment of the SGMNM in 2014 and in the 2005 forest plan process for the Angeles National Forest.

PROTECTED OBJECTS OF INTEREST

CalWild's SGMNM draft plan comments stated our view that the draft plan's brief description in Appendix C of "protected objects of interest" was inadequate and incomplete (see CalWild's draft SGMNM comments dated Nov. 1, 2016, pgs. 1, 2, 4, 5, 10-25). Instead of improving the list from the draft plan, this inadequate description has apparently disappeared entirely from the final plan and FEA. According to FEA pg. 7, a more detailed description of protected objects was rejected because it:

"...would be continuously evolving, would require staff time well beyond current capacity, and would be of questionable utility. Instead of mapping and quantifying every object of interest, the Forest Service intends to manage protections within the Monument on a landscape scale, by focusing on protecting species' habitat. During this process, the Forest Service made changes to the Monument Plan to enhance broad-scale direction to protect the objects of interest."

CalWild agrees that the list of objects of interest is iterative by nature and will likely evolve over time. However, we fail to see this as roadblock to providing at least an initial and reasonably detailed list of protected objects. We leave it to the agency to determine its staff capacity but we must point out that CalWild's Nov. 1, 2016 comments provided 14 pages of detailed descriptions of the objects mentioned in the President's proclamation, with source citations. The Forest Service should feel free to use our comments as a basis to develop a detailed list of protected objects. Given that this information is readily available, we question the agency's assertion that incorporating this information "would require staff time well beyond current capacity."

More importantly, CalWild disagrees with the assertion that providing such a list “would be of questionable utility.” We do not see how the agency can exercise its responsibilities over time to protect the Monument’s objects of interest without a reasonably detailed description of those objects. Given that many agency staff involved in the establishment of the Monument in 2014 and development of this plan up to this point will likely retire or be transferred to other forests over time, it is essential that the Monument plan be as detailed and transparent as possible to provide an effective guidebook for the use of future managers and the public.

The summary of protected objects provided on pages 169-170 of the draft plan is inadequate. It should be improved, expanded, and reinstated in the final Plan and FEA. For example:

Cultural Resources: The summary mentions the Aliso-Arrastre Special Interest Area, the remnants of the historic mining town of Eldoradoville, and remnants of historic resorts. CalWild’s Nov. 1, 2016 comments identified additional state historic landmarks, several historic mining sites in addition to Eldoradoville, and several historic recreation sites – all of which should be included in a detailed list of protected objects.

Modern Recreation: The summary mentions 87 miles of the Pacific Crest Trail and other national recreation trails and four designated wilderness areas providing a backcountry experience for Monument visitors. It would be useful to specifically identify all the national trails in the Monument, including the PCT, Gabrieleno, Silver Moccasin, High Desert, the nationally unique West Fork Bikeway, as well as the internationally known route to the summit of Mt. Baldy. A detailed list of protected recreation objects should include not only national trails and wilderness areas, but also popular recreation sites (such as campground and picnic areas) and day use areas (particularly along streams).

Geology: Specifically mentioned in the 2014 proclamation, the unique geology of the San Gabriel Mountains and specific areas that possess unique geology, such as the Devil’s Punchbowl Botanical-Geological Special Interest Area, were not listed in the draft plan summary at all. The formation of Crystal Lake and Jackson Lake should be mentioned as geological objects of interest as well as watershed values.

Scientific Significance: Although scientific use of Mt. Wilson and to a lesser extent, the San Dimas Experimental Forest (SDEF), are mentioned in the summary, information should be added to document the SDEF’s record as hosting the “largest” lysimeter structure ever built and the SDEF’s status as a UNESCO Biosphere Reserve.

Wildlife and Habitat: The summary notes important habitat for sensitive and endangered wildlife species and connectivity corridors for wildlife migration, but it fails to include

threatened and endangered amphibian and fish species (which are noted under Watershed Values – see comments on this section). None of the “Areas of High Ecological Concern” identified in the 1999 Southern California Mountains and Foothills Assessment (the science assessment that provided the basis of the 2005 Forest Plan revision) are specifically mentioned.

Infrastructure: CalWild does not believe that it was the intent of President Obama to list infrastructure, including dams, water delivery structures, telecommunications sites, and utility towers, as protected objects of interest. Instead, it appears to us that the brief mention of infrastructure on Proclamation page 3 is a preface to the specific language on Proclamation page 4 assuring continued use of this infrastructure. To the extent that existing water infrastructure plays a key role in supplying clean drinking water to adjacent communities, this should be mentioned under Watershed Values.

Watershed Values: The summary failed to note that the SGMNM watersheds are an important source of clean drinking water for adjacent communities. But none of the streams specifically mentioned in the Proclamation are noted in the summary, including the San Gabriel River, Little Rock Creek, and San Antonio Creek, nor are these streams’ eligibility for National Wild and Scenic River protection mentioned. Because the eligible wild and scenic river segments are not formally considered a “land use zone” under the plan, the eligible segments are not shown on plan maps. Since the eligibility determination underscores the unique values of the river segments, they should be displayed in plan maps and documented as protected objects of interest. This is crucial given that these streams are a small part of the 2% of streams considered eligible for federal protection in the U.S.

Scenic Areas: The summary mentions San Antonio Falls and Crystal and Jackson Lakes are protected scenic objects, but many other “places” with high or unique scenic values already documented in the 2005 plan are not mentioned. They should be included in a list of protected objects.

Vegetation Communities: The presence of several of California’s signature natural vegetation communities and other unique ecological attributes noted in the Southern California Mountains and Foothills Assessment are not mentioned in the summary. The draft summary fails to include existing Research Natural Areas or botanical special interest areas, which are appropriate for listing as protected objects. The summary also fails to mention that the SGMNM supports 52 Forest Service sensitive plants and as many as 300 plant species endemic to California. These too should be included in the list of protected objects.

CalWild also questions whether the stated intent in the FEA “...to manage protections within the Monument on a landscape scale, by focusing on protecting species’ habitat” will be

effective. Certainly, this addresses the need to protect endangered and sensitive wildlife and their habitat, but it most certainly does not address the need to protect specific cultural and historic sites, scientific sites, geology, scenery and the other non-wildlife and habitat related values. This can only be done by included a comprehensive-as-possible list of protected objects.

Relief Requested – Include an improved summary of protected objects in the final Plan and FEA and provide an appendix that includes a comprehensive-as-possible list of protected objects based on existing knowledge, while noting that this list is iterative and will be expanded over time as additional resource information becomes available. If there is uncertainty as to whether a specific site or resources merits protection as an object of interest, apply interim protection until its value can be determined as part of a future site-specific project environmental analysis.

CRITICAL BIOLOGICAL LAND USE ZONES (CBLUZ)

In our Nov. 1, 2016 draft plan comments, CalWild recommended that the CBLUZ be expanded to include all designated habitat for at risk aquatic species. Although the CBLUZ was expanded to include additional critical habitat, not all such habitat was encompassed in the expansion. This includes all mountain yellow-legged frog habitat in the East Fork San Gabriel River, Bear Creek, and Devil’s Canyon. In addition, the expanded CBLUZ for Santa Ana sucker in the East Fork San Gabriel River was cut short of the Bridge to Nowhere due to inexplicable “safety features” (DN/FONSI pg. 4). The application of the CBLUZ in the final Plan and FEA seems arbitrary and lacks any stated guiding principal.

Relief Requested: Given the importance of TES habitat, particularly aquatic habitat in the SGMNM, CalWild urges that the Forest Service expand the CBLUZ to include all applicable critical habitat in the SGMNM.

CARRYING CAPACITY AND GATEWAY PLANS

CalWild’s draft plan comments recommended that the SGMNM Plan include on a list of future actions the development and implementation of gateway plans for heavily used SGMNM destinations such as the San Gabriel River and Little Rock Creek. The purpose of the gateway plan concept is to focus limited agency resources on determining the carrying capacity of heavily used recreation areas and to implement appropriate management changes to reduce impacts on aquatic species and habitat. Unfortunately, the gateway plan concept was virtually ignored in the final plan and FEA.

However, we do appreciate that wording from the draft plan was improved in the final plan to

assure that important future actions to “Evaluate the sustainable recreation carrying capacity in high use areas such as the SG canyon...” remain as vital components of plan implementation. However, the final SGMNM Plan should expedite these carrying capacity assessments, which are needed for future visitor and management improvements in the San Gabriel River canyon and would be even more useful for Little Rock Creek upstream of Little Rock Reservoir. Little Rock Creek above the reservoir has been closed to the public for nearly 20 years, even though the 2005 plan committed to open the area once impacts on endangered species and habitat were evaluated and management changes implemented. This complies with the 2012 Planning Rule (219.7[f][3][iv]), which requires that plans “Contain information reflecting proposed and possible actions that may occur on the plan area during the life of the plan...”.

Relief Requested: Implement existing plan direction to assess carrying capacity and recreation impacts on aquatic species as soon as possible for the San Gabriel River canyons and Little Rock Creek.

ACQUISITION OF INHOLDINGS

The SGMNM plan should include on a list of future actions priority willing seller acquisition of inholdings in sensitive areas of the SGMNM. This would be particularly important in high use and sensitive areas like the San Gabriel River Canyon and the CBLUZ, wilderness and roadless areas, and in critical biological corridors (such as Soledad Canyon). CalWild’s Nov. 1, 2016 comments included this reasonable request, which was entirely ignored.

Relief Requested: Include on a list of future actions high priority willing seller acquisition of inholdings in sensitive areas of the SGMNM.

CalWild is looking forward to working with the Forest Service in the development and implementation of a SGMNM plan that fully achieves the intent of President Obama’s proclamation.

Sincerely,



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