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Re: San Gabriel River Confluence with Cattle Canyon Improvements Project #50466

Thank you for the opportunity to comment on the Draft EIS/EIR for the San Gabriel River Confluence with Cattle Canyon Improvements Project. The Pasadena Casting Club has been following this project since 2015 when the original design work was made public by the Watershed Conservation Authority and we have participated in public meetings about it and submitted comments last year on the Scoping document. We applaud the project's purpose "to balance the recreational improvement with biological resources protection" (DEIS-DEIR, 3.1-5), and we want to see outcomes that restore and ensure the ecological health of the riparian environment and adjacent watershed. The Draft EIS/EIR appears to propose adequate mitigation for potential, temporary environmental impacts and damage anticipated to be caused by the construction of the project.

We are pleased to see explicit acknowledgement made in the documents of the fact of illegal mining and its consequent environmental damage in the EFSGR, the inclusion of the detailed Hydrology report (Appendix D) which refers to the standards of the Water Quality Control Plan for the Los Angeles Region, and substantial reference to the Watershed Function elements of the Angeles National Forest Land Management Plan, Part 2 Appendix B.

However, consistent with our Scoping comments of 2016, we are concerned about (1) the ongoing damage on the stream and to its ecosystem resulting from illegal mining and swim dam building, (2) the degraded water quality caused by both the illegal mining and excessive body contact recreational water activities, and (3) the overall risk to environmental sustainability as a result of overuse and overcrowding of the streamside areas. Here we expand our comments on these problems.

- We understand that the issue of illegal mining and its damage need not be addressed in the NEPA process, but it should be dealt with somewhere in the project plan. Incidental reduction in mining activity as a result of day-use-only regulation of the project site will not be sufficient. Lack of law enforcement resources, again an item that we understand is not pertinent to the NEPA process, should nonetheless be addressed at the administrative level as the completed project site becomes open to use. Although the illegal mining activity is outside the scope of the NEPA process, the illegal activity is nonetheless part of the cumulative effects /impacts on the environment, and will affect the water quality experienced by downstream users. If the signatory agencies to the NEPA are not actively and effectively enforcing prohibitions on mining, then the cumulative effects of Alternative A may require shutting downstream access to alleviate turbidity and fecal contamination. We recommend that as part of conserving Environmental Justice



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Resources at the site, the ANF should monitor and annually report on regional upstream illegal mining activity and enforcement activities in the MMRP. This would include water quality analysis both upstream and downstream of the proposed improvements to determine the areas of appropriate enforcement and response to ensure water quality and safety.

- With respect to water quality, the San Gabriel River Monitoring Report 2016-2017 found that, “Based on EPA BAV (Beach Action Value) recommendations (Table 6), all sites would have issued a “beach” notification in the summer of 2016, with the greatest number of notifications occurring at the North Fork site (Table 7), the majority of them on weekends.” (p 17). This means that the East Fork sites of Coyote Flats, Graveyard, and Oaks would have been closed to swimming because of bacterial contamination, primarily from human waste, if the standards of a county seaside beach were applied. The report also recommends ongoing monitoring after project completion when use of the area resumes. Routine water quality monitoring of the EFSGR has been a recurrent problem because of lack of resources and, perhaps, lack of clarity about agency responsibility. This also is a problem that must be addressed at the administrative level, including in the MMRP, for this project to achieve its goals.
- The ANF Land Management Plan emphasizes as a strategy the work to “Protect, maintain and restore natural watershed functions including slope processes, surface water and groundwater flow and retention, and riparian area sustainability.” The challenge to this value in the context of overcrowding and overuse will require sustained administrative attention to enforcement of visitor rules and consideration of capacity limits, regardless of the general effectiveness of the project’s design. Although the area of improvements is located adjacent to wilderness, it actually functions as an urban park, and (especially on summer weekends) has an intensity of use similar to a public swimming pool or public beach which are typically staffed with lifeguards. Therefore we recommend public safety monitoring and staffing similar to a public beach, to address recreational and environmental justice for all users.
- The EIR addresses the problem of lack of parking, and notes that many of the current users hike to the Bridge To Nowhere. This is a small area of private land under the jurisdiction of LA County planning, where a recreational amusement facility (Bungee America) is currently operating without county zoning approval, and without providing code-required parking on county land. The NEPA should therefore state whether the ANF intends to lease the public parking improvements to Bungee America (private use), rather than to the ANF recreational users addressed in section 3.2.

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