

October 31, 2016

Angeles National Forest  
ATTN: Justin Seastrand  
701 North Santa Anita Avenue  
Arcadia, CA 91006

Dear Mr. Seastrand,

We share President Obama's enthusiasm for the majesty of nature in the San Gabriel Mountains and the many opportunities our iconic mountain range provides to get in touch with nature, rejuvenate, recreate, and enjoy the outdoors.

We appreciate this opportunity to share our joint comments on the August 2016 Draft San Gabriel Mountains National Monument Management Plan and Environmental Assessment ("Draft Plan") as part of the public engagement process required by the Proclamation and 2012 planning rule. We hope this is the first step in a continuous process that includes input from the Collaborative and other interested stakeholders in future planning and implementation decisions made by the Forest Service.

These comments represent the consensus views of the San Gabriel Mountains Community Collaborative ("SGMCC" or "Collaborative"). The SGMCC consists of 44 members representing the full range of interests associated with the Monument including government officials, agencies, non-profit and environmental organizations, education representatives and businesses.

The mission of the SGMCC is to:

"Represent the general public by integrating diverse perspectives to identify, analyze, prioritize and advocate for values, resources, investments, management objectives and implementation practices that sustainably benefit all communities throughout the region, the Angeles National Forest and the San Gabriel Mountains National Monument."

One key goal of the SGMCC is to:

"Provide a forum where diverse community voices can express their views and identify areas of agreement to help inform Forest Service decisions and activities"

The SGMCC has worked hard to provide thoughtful and constructive comments to the Draft Plan and we trust that you will give them serious consideration. The Collaborative values our partnership with the Forest Service and desires to maintain open and effective communications on issues of concern in order to work towards mutually acceptable decisions.

The Collaborative believes that the Draft Plan can be considerably strengthened to better address issues of significant concern to Collaborative members. The Collaborative supports a robust Monument Plan that lays out a clear and comprehensive vision for the Monument, preserves existing rights, and includes specific objectives and timeframes for action to achieve desired conditions.

Many members of the Collaborative worked hard for many years to establish the Monument. One major goal was to attract more resources to the Monument. Another key driver was to resolve existing management issues. Despite the many admirable goals included in the 2005 Forest Plan, little progress was made towards achieving objectives over time. This problem was exacerbated by chronic lack of

funding, staffing shortages, and inadequate attention being paid to visitor needs and gateway community concerns.

It is our hope that the Monument Plan will realize the promise of the San Gabriel Mountains by focusing on this land as a key cultural and recreational resource for Southern California versus managing the land simply as a National Forest. The San Gabriel Mountain National Monument is a special place with many unique features, described as “objects of interest” in the Proclamation, which should receive additional protection above and beyond what was available under the 2005 Forest Plan. A comprehensive and visionary Management Plan will assist in raising funds for the protection, restoration, maintenance, and interpretation of these objects.

In addition, due to the unique recreational role that this area fulfills for the Southern California community, where open space is at a premium, Collaborative members hope that the declaration of the Monument will create a much needed focus on visitor experiences and area recreation needs, resulting in better management, maintenance, and improvement of popular recreation sites and activities within in the Monument. This focus includes enhanced outreach to low income and diverse communities whose residents would benefit from much needed outdoor recreational opportunities.

At the time the Monument was established, the Congressional representatives who were instrumental in setting aside this land indicated that they wanted a completely new Management Plan for the area with a new vision that aligned with the aspirations of the community and addressed the management issues that had been previously identified.

As soon as the Proclamation was issued, the National Forest Foundation (“NFF”) worked with the United States Forest Service (“Forest Service”) and a cross section of stakeholders to create the Collaborative, partially to obtain input for that Plan. In establishing the Collaborative, NFF made sure that interested parties who had opposed the designation, as well as affected parties who had not participated in efforts to establish the Monument, were included to ensure that broad representation would lead to a new management direction that would strike a balance and accommodate as many interests as possible.

The Collaborative believes that visitor education, sustainable recreation, resource protection, watershed management, and infrastructure such as water storage facilities and power lines can generally coexist with minimal conflict. The Collaborative wants a balanced Monument Plan that recognizes the important role each element plays in the overall success of the Monument.

Collaborative members represent a broad set of community interests such as business, public works, financial, recreational, and environmental interests within the Monument. The Environmental Assessment and plan should make clearer how the Monument designation, which establishes additional protections for identified objects, might affect these interests. The Collaborative is interested in protecting current and future uses of water and utility infrastructure and in protecting continued usage by cabin owners, businesses, recreation enthusiasts, and similar stakeholders. While we expect these interests will be protected, it would be beneficial to have the Plan clearly identify which specific objects are being afforded additional protection, where these objects are located, how this additional protection will be managed to minimize conflicts among competing uses when and if they occur, and any potential impacts to existing uses and rights.

## Suggested Changes

The Forest Service encouraged the Collaborative to provide input on all changes that it believed should be made to the Draft Plan. In order to express our intent, we have attached a marked-up version of the Plan that incorporates our thoughts in a more detailed fashion.

This letter describes the changes we are seeking at a policy level and our rationale, while the marked-up plan shows the specific changes we are recommending. The two documents combined constitute our input on the Draft Plan.

We recognize that it may not be possible for our Draft Plan language to be adopted exactly as written; however we would like all issues identified in either the letter or the markup to be addressed by changes in the Draft Plan. Please note that we did not provide suggested mark-up edits for all comments made in this letter. Those comments without specific mark-up suggestions are further identified below.

### 1. Unified Plan

Our first comment relates to the format of the Draft Plan. One of the primary goals of the 2012 Planning Rule is to better engage members of the public in the planning process by providing for a transparent, collaborative process that allows effective public participation (77 FR 21164). One necessary input to a transparent process is a Draft Plan that can be easily understood by the public. Otherwise there can neither be effective public participation nor useful public input. The Collaborative, which is made up of members of the general public, has long advocated that the Monument Plan be written as a single, stand-alone document that contains all relevant requirements in one place, so that any person can easily understand the vision for the Monument, how it will be managed, and how that management might affect them. While we understand that there are several guiding documents for forest management and the Forest Service has chosen to address the requirements of the Proclamation as an amendment, we do not believe it is reasonable to require people to have to research and refer to multiple documents, legal decisions, and handbooks to try to understand how the Forest Service will manage the Monument.

A unified plan can be accomplished by means of a Forest Plan Amendment. The Collaborative has pointed to the Chimney Rock National Monument Management Plan<sup>1</sup> as a good example of a Forest Plan Amendment that created a simple, stand-alone document that speaks to all aspects of monument management, including 31 objectives and a 7-page Monument-specific Monitoring Plan. This plan was concise, detailed, easy to understand, and contained all necessary goals and objectives.

As written, the current Plan only includes the minimum number of items that were identified as needing to change based on the Forest Service's Need to Change analysis and is therefore too fragmented and requires too much reference to other documents to be fully understood or to clearly communicate with the public on relevant issues and concerns. Further, it was not clear what was being added to the existing Forest Plan versus what was being replaced. For example, because existing Forest Plan strategy WL 2 – Management of Species of Concern was partially repeated in the Draft Monument Plan, we were not certain if the proposed Biological Resources section was intended to supplement or replace the existing section.

Even though many Collaborative members spent a great deal of time researching supporting documents in order to better interpret the Draft Plan, we still cannot claim to fully understand how the Monument will

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<sup>1</sup> The Chimney Rock National Monument Final Management Plan (August 2015, San Juan National Forest) is available at [http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprd3852002.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3852002.pdf)

be managed, since many pieces are missing and there were no cross-references or citations to point us towards the information we were seeking.

In conclusion, although the Collaborative is providing its feedback in the same format that the current plan is written, we would still encourage the Forest Service to work towards creating a unified plan in the future when the Forest and/or Monument Plan is next revised or amended.

## 2. Monument Vision

In the eyes of the Collaborative, the Monument is more than a National Forest, it is now also a National Monument which needs to have a vision that is consistent with the aspirations of the community that worked for its creation. Collaborative members have repeatedly asked that the new and different vision for the Monument that led to its establishment be clearly articulated in the Plan in order to support the increased emphasis on protection, recreation, education, interpretation, and visitor services that is desired by the community, and to capture the balance between protection, recreation and infrastructure that is expressed in the Proclamation. Clearly articulating this vision is important in driving the Monument-specific desired conditions, objectives and management approaches that are being developed.

Since the Forest Service has not proposed a Monument vision statement, the Collaborative has proposed one in the same style that was used for the forest vision statement in the existing Forest Plan. Because there is no definition or description of the National Monument land use zone special designation overlay in either the Draft Plan or the existing Forest Plan, this vision statement is intended to fill that gap.

## 3. Objectives, Monitoring Plan, and other Components

The most important components that are missing from the Draft Plan are objectives, a Monument-specific monitoring plan, adequate standards and guidelines, and the commitment to an active management strategy. Objectives and a monitoring plan are required plan components under the 2012 Planning Rule (36 CFR 219.7(e)(1)). The omission of these two components is particularly troubling, since the lack of progress towards desired conditions under the existing Forest Plan was one of the key drivers behind the creation of the Monument. The establishment of objectives is the most important thing that needs to be corrected in the new Monument Plan. Without objectives and timelines in which to move forward to desired conditions, the Draft Plan remains merely a high-level assessment of problems and potential solutions without a clear path to resolve them.

### a. Objectives

Objectives are defined as “concise, measurable and time-specific statements of a desired rate of progress toward a desired condition or conditions” (36 CFR 219.7(e)(1)). The Forest Service has stated that it cannot set any objectives for the Monument because objectives must be based on the reasonably foreseeable budget, and it cannot guarantee that anything can be achieved due to lack of funding.

The Collaborative acknowledges the funding issue, but the lack of any objectives is unacceptable. We have confidence that the Forest Service is capable of achieving well thought out objectives. The additional staff that are being hired due to the Monument designation should benefit this effort. While the planning rule says that objectives should be based on a reasonably foreseeable budget, it doesn’t say that this must be the case. Further, setting forth clear expectations should have a catalyzing effect on Forest staff.

One of the most important developments that has occurred since the establishment of the Monument is that many organizations have expressed interest in partnering with the Forest Service to provide or raise funds to achieve Monument goals. In order to leverage these partnership opportunities, a clear vision for the future of the Monument, along with the specific objectives to achieve desired conditions and an implementation timeline needs to be articulated. Financial and in-kind contributions from partners may be considered when determining what resources might be available (A Citizen's Guide to Forest Planning, p. 17).

The San Juan National Forest set 31 objectives in its Chimney Rock National Monument Management Plan, all of which were conditioned on the ability of the USFS to obtain funding. This laid out a clear plan for the future that all members of the public could comment and agree upon and then partner with the Forest Service to achieve. The wording in the plan stated:

“[Objectives] are aspirations, not commitments or final project decisions. Implementation and achievement would rely upon sufficient funding and staffing levels.” (Chimney Rock National Monument Management Plan, p. 4)

Even though the Chimney Rock National Monument Management Plan was prepared under the transition provisions of the 2000 Planning Rule regulations, that does not prohibit such language from being included in the current plan.

Congress also has a role to play in making sure that the Monument, which is located next to the second largest urban center in the United States, has adequate funding to succeed. Due to drought and climate change, each year more and more of the Monument and Angeles National Forest budget goes to fire fighting. The Monument needs stable baseline funding. This can be facilitated by legislation to separate the Forest Service fire-fighting budget from its operating budget.

The Collaborative believes that all identified future actions that the Forest Service must complete to achieve desired Monument conditions should be listed as objectives with estimated rates-of-progress or completion dates, regardless of identified funding. This will clearly and transparently communicate Forest Service priorities and expected timelines to the public in order to achieve shared agreement with the community on its future work plan. If this information is not included, the public is prevented from commenting on Forest Service priorities and its expected rate of progress towards achieving the community's vision for the Monument

If the Forest Service still feels uncomfortable with the term “objectives,” the Collaborative would also be amenable to using the term “goals” to describe some of these commitments, as described in the Forest Service Handbook (FSH 1909.12\_20, p. 43).

“Goals instead of objectives may be appropriate if the Responsible Official is not sure a concise, measurable, and time specific statement of a desired rate of progress is within the control of the unit... Examples are... 2. If the outcome is uncertain, because it could be beyond the fiscal capability of the unit.”

Silence, however, is not a satisfactory solution. The Collaborative and the general public are keenly interested in the expected rate of progress to achieve desired conditions. Therefore, the Collaborative has suggested objectives/goals for all key management approaches. In particular, the Collaborative has suggested the development of a number of more detailed implementation plans that it would like to see prepared following the adoption of the Monument Plan.

The Collaborative has not attempted to prioritize the listed goals/objectives, compare them to available resources, or lay out a specific work plan. Only the Forest Service can accomplish that task. What we have done is identify a number of specific tasks that we believe must be completed to achieve the desired conditions and preferred time frames for their completion in brackets.

In order to provide for the best possible management of the Monument, the Collaborative would like to see the Forest Service prepare an integrated, long-term Master Plan that covers all future activities and improvements needed to achieve desired conditions. Such a plan would encompass degraded facilities, ecosystems and objects of interest; inadequate maintenance activities; enhanced recreation opportunities, visitor engagement, education, and interpretation; protection of existing infrastructure, facilities, and uses; and transportation needs (both road and trail). The plan would also identify specific short and long-term project goals and timeframes, including any partnership and fundraising requirements necessary to achieve plan objectives.

We would like this Plan to be prepared in cooperation with the Collaborative and other interested members of the public in order to strengthen our existing partnerships and commitment to work together to achieve shared objectives. This strong desire for a detailed Master Plan is reflected in our comments, which include specific objectives to prepare the components of such a Master Plan within the applicable sections of the document.

This being said, we support clearly beneficial project work occurring in parallel with work on planning objectives. One clear example of this is the East Fork Project adjacent to the Cattle Canyon confluence.

### b. Monitoring Plan

The second most important item lacking in the Draft Plan is a Monument-specific Monitoring Plan. The need for a Monitoring Plan is referenced multiple times in the 2012 Planning Rule.

“A land management plan must contain a plan monitoring program.” (36 CFR 219.12)

“The responsible official shall develop a monitoring program for the plan area and include it in the plan.” (36 CFR 219.12)

“Each plan monitoring program must contain ... monitoring questions and associated indicators addressing ... progress toward meeting the desired conditions and objectives in the plan” (36 CFR 219.12(a))

The Collaborative does not believe that the monitoring plan that has been proposed for the Forest Plan is sufficient to track progress towards the unique desired conditions and objectives contained in the Monument Plan. We would like to see a monitoring plan included in the Draft Plan that bridges this gap. In particular, the Collaborative is interested in monitoring to track objectives related to:

- Developing the specific list of objects of interest, including their location and condition;
- Improvements in sustainable recreation and visitor reception services, including implementation of a visitor reception system, upgraded amenities, interpretation, and educational activities;
- Evaluation and preservation of heritage resources;

- Improvements in parking, traffic congestion and the availability of alternative transportation options;
- A status of road, trail, and parking conditions related to the transportation system maintenance strategy;
- Conflicts between objects, recreation, water rights, infrastructure or other activities that may need a plan amendment to resolve; and
- Management of changes to biological and watershed resources due to climate change.

The Collaborative has not proposed a specific monitoring plan, since the data available to answer monitoring questions is best known to the Forest Service. However, the Collaborative believes that inclusion of a Monument-specific monitoring plan is vital to the success of the Plan. If resources are not currently available to conduct the level of monitoring that is necessary, the Collaborative recommends utilizing volunteers from the surrounding community to supplement existing resources.

Without such a monitoring plan, the Forest cannot determine the baseline condition of the objects identified in the proclamation. Although the permitting process may identify impacts to the Monument from specific projects, not all threats to the Monument follow this process. Vandals, for example, don't seek a permit. Therefore, without ongoing monitoring, the Forest Service will not know it is adequately achieving the Proclamation's requirement to protect the objects of significance.

### c. Standards and Guidelines

Standards and guidelines are also required plan components under the 2012 Planning Rule. These components must be included "to help achieve or maintain the desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements" (36 CFR 219.7(e)(1)(iii-iv)).

The Chimney Rock National Monument Management Plan contains 21 standards and 22 guidelines carefully designed to protect and preserve the objects of interest within the Monument. In contrast, the Draft San Gabriel Mountains National Monument Management Plan contains no standards to protect the objects of interest. The sole standards included in the Draft Plan address heritage resources and how the required land withdrawal will affect existing mineral rights. Similarly, the Draft Plan contains only five guidelines, three of which are related to protection of the objects of interest: one for historic resources and two for the Pacific Crest Trail.

The Collaborative encourages the development of additional standards and guidelines to achieve the desired conditions outlined in the plan as envisioned by the 2012 Planning Rule. At a minimum, the Collaborative has proposed two additional standards to protect the objects of interest within the Monument; one guideline that expresses the Collaborative's desire for protection, recreation and infrastructure needs to be balanced during project planning decisions; and four additional standards and guidelines.

### d. Active Management Strategy

The Monument Plan should reflect a commitment to an active and adaptive strategy that emphasizes the scientific assessment of forest health conditions and a proactive approach to habitat restoration and enhancement programs. For example, Monument goals should include the

development of preventative measures and steps to repair detrimental impacts from human activity and natural challenges such as fires, flood, landslides, and climate change.

The results of such a strategy would provide improvements in environmental quality, habitat health and watershed function. The ultimate goal is the balance of the health of the forest with human interaction.

#### 4. Identification of Objects of Interest

While not required to be part of the Plan itself, the Draft Plan and the Environmental Assessment (“EA”) fall short by not specifically identifying the objects of interest that the Draft Plan is intended to protect.

The Presidential Proclamation only provides examples of the categories of protected objects within the Monument, as is typical of an authorizing document. It is up to the implementing agency, in this case the Forest Service, to develop the details and regulatory structure needed in carry out the intent of the authorizing action. In this case, this involves fleshing out the list of protected objects to specifically identify what is being protected, where it is located, determine each object’s status, ensure that each object is being adequately protected, take corrective action if that is not the case, and conduct monitoring to ensure that the status of these objects remains stable or improves over time to eliminate existing degradation.

For the past two years the Collaborative has requested that the Forest Service take the general language in the Proclamation and use it to develop a comprehensive list that is available to the public and that identifies the specific objects and/or categories of objects that are in the Monument, their location (to the extent allowed by current policy), and condition.

Developing a list of specific objects and/or categories of objects is necessary to:

- a) Boost awareness and appreciation of these resources;
- b) Know exactly what the Monument is protecting;
- c) Understand what objects are available for interpretation;
- d) Ensure that there are sufficient provisions in the plan to adequately protect and preserve all objects;
- e) Develop a plan to ensure that the public will have continued access and the opportunity to appreciate these objects;
- f) Determine whether the current transportation system is consistent with the protection of identified objects, and;
- g) Allow individuals, groups, and businesses with private land holdings, infrastructure, or activities within the forest to understand how they may be affected, in order to allow them to provide specific input into the Draft Plan to ensure compatibility of uses and operations.

Following the completion of this list, the Collaborative has also asked the Forest Service to create a map identifying where these objects are located for educational and informational purposes. Each of the 111 previously established National Monuments in the country, including those managed by Forest Service, has produced a public map of key highlights that helps guide the visitor experience.

The Collaborative understands that the location of certain prehistoric and historic or otherwise sensitive resources either cannot or should not be disclosed. However, we would still like such resources to be identified on an overall list, and for the list to be as precise as possible. For example:

<b>Object</b>	<b>Location</b>	<b>Status</b>
30 prehistoric sites	Confidential	Sites are documented. 12 – pristine 8 – degraded, in need of restoration 10 – at risk, review options to reduce risk
250 CA endemic species (list)	See map	Common and abundant, no additional protection required
Santa Ana sucker	See map	Threatened (Federal), Not Listed (State), Recovery Plan has been developed (2014)

An expanded discussion of the heritage resources, scenic areas, and species that might be considered objects of interest appears in the various sections of the EA. However, the items identified are still incomplete. For example, the Proclamation refers to the “300 California endemic species,” “rare Mediterranean ecosystem,” “California’s signature natural vegetation communities,” and “agriculturally important pollinators” as objects of interest. That language needs to be translated into specifics and aligned with both State and Federal listings. Because the Monument has been set up specifically to protect California species and heritage assets, state requirements should be considered during the planning process. Currently, neither the Plan nor the EA discuss how species that have been identified only by the State as endangered, threatened, proposed, candidate or special status species, or plant communities designated as rare, will be treated.

Examples of questions that have been raised that still cannot be answered are:

- What is the extent of Eldoradoville, and does the additional protection of this area conflict with existing Department of Public Works activities in this area?
- Is the Southern California Steelhead Distinct Population Segment considered an object of interest?
- Are any existing homes, businesses, or infrastructure located in the vicinity of protected objects and will any additional actions need to be taken to protect these objects?
- Are traditional cultural properties considered objects of interest?

Further, because there is no list of objects, the EA has not assessed the potential impact of the additional protection of these objects on existing homes, businesses and infrastructure. This is a question of acute interest to many members of the collaborative and on which the EA is silent. The Forest Service needs to assess this issue and state whether or not there are any conflicts or adverse impacts to existing infrastructure.

This is also a requirement in regards to the existing transportation system. The Proclamation states that the Transportation Plan must ensure the protection of objects of interest including the potential closure of roads or implementation of travel restrictions. The Forest Service needs to assess whether or not there are any such conflicts.

As noted above, the Collaborative does not expect this list of objects to be included in the Plan, as it will be a continually evolving list. However, it should be completed as soon as possible, since this is an essential, foundational activity for any assessment of whether the Draft Plan is adequate and for the general public to understand its implications. Consequently, this activity has been included in our plan markup as a key objective.

a. Water Resources as Objects of Interest

Watershed values are listed as an object of interest in the Proclamation. Most of the San Gabriel Valley and the communities surrounding the Monument, including those located in the Santa Clara river watershed, rely on water from the Monument. Therefore, it is a core issue to Collaborative members that the Plan ensures water rights and the protection of water resources, road access to water resources, sediment dredging and burial, and other water management activities. Because watershed values are listed as an object of interest in the Proclamation, we believe that how protection of watershed management activities such as those relating to drinking water and flood control are balanced with the protection of heritage and biological resources needs to be clearly articulated within the Plan.

We ask that the Forest Service consider biological, historical, cultural, recreational, infrastructure and watershed resources, including the provision of drinking water and flood control services, when conducting its management activities. These resources must be managed in a balanced and mutually beneficial fashion, with all interested parties included in the process.

5. Purpose of Monument Plan

The Draft Plan's description of the Watershed Values identified as objects of interest in the Proclamation is flawed by only referencing rare and endangered fish. The Proclamation specifically references the watershed values that led to the establishment of the San Gabriel Timberland Reserve in 1892. These values include the provision of drinking and irrigation water, managing fire and deforestation to reduce floods, and supporting infrastructure. Rivers, lakes and waterfalls that comprise the watershed are also mentioned. Rare populations of fish should be included under the banner of endangered and sensitive wildlife and habitat.

6. Sustainable Recreation/Visitor Reception, Information and Education

The existing Forest Plan is written primarily to address issues related to forest management by focusing on goals such as fire management, forest health, invasive species, watershed protection, riparian condition, and related subjects.

The establishment of the Monument was intended to expand this focus to provide increased emphasis on sustainable recreation, visitor reception and services; in particular, interpretation and educational activities. While the Collaborative agrees with the Desired Conditions and Management Approaches outlined in the Sustainable Recreation section of the Draft Plan, we feel there is a need for substantial augmentation and improvement due to their significance. Further, because interpretation and educational activities are a primary focus of the Proclamation, we have suggested that there be two sections in the Draft Plan, one addressing Sustainable Recreation and one addressing Visitor Reception, Information and Education. Therefore, in our markup Draft we have divided the existing section in two and moved relevant points from the current Sustainable Recreation section to a new Visitor Reception, Information and Education section.

This is consistent with the organization of the existing Forest Plan, which contains separate management strategies for recreation and education (REC 2-4).

We believe that REC 2- Sustainable Use and Environmental Design and REC 3 - Recreation Participation (2005 LMP, Part 2, Page 111) are especially applicable to sustainable recreation in the Monument:

## *REC 2- Sustainable Use and Environmental Design*

*“Analyze, stabilize and restore areas where visitor use is negatively affecting recreation experiences, public safety and environmental resources. Manage visitor use within the limits of identified capacities: Implement recreation capacity control measures in specific high-use areas as use levels become a concern. Conduct threatened, endangered, proposed, candidate and sensitive species occupancy surveys within potential threatened, endangered, proposed, candidate and sensitive species recreation conflict areas. Implement Adaptive Mitigation for Recreation Uses ... in existing and new recreation sites and uses whenever a conflict between uses or sensitive resources is detected.”*

## *REC 3 - Recreation Participation*

*“Offer a wide range of high quality, environmentally sustainable developed and dispersed recreation opportunities to a rapidly growing and culturally diverse visitor population, with minimal visitor conflicts and effects to other resources:*

- Develop new, environmentally sustainable recreation opportunities, areas and infrastructure to relieve concentrated demand within existing high-use areas and to accommodate future growth and new uses elsewhere.*
- Improve, remove or replace aging developed recreation infrastructure to better meet current needs and future demand. Replacing opportunities lost to closures will be a high priority.*
- Inventory and analyze existing and potential dispersed use, including, but not limited to, hiking, motorized recreation, day-use, recreational target shooting, waterplay, snowplay and camping opportunities. Identify areas where that use is consistent with resource protection and public safety, and mitigate or eliminate problems over time.*
- Implement adaptive management processes at recreation facilities to proactively respond to persons with disabilities, contemporary urban visitors, aging populations, diverse ethnic groups, and day-use emphasis.”*

To supplement these sections, we have proposed more detailed management strategies and specific objectives in the Draft Plan consistent with the 2012 Planning Rule. This is to address the community’s perception that there has been a significant lack of progress in the above areas since 2005.

Recreation topics that the Collaborative believes should be particularly emphasized in the Draft Plan are the evaluation of visitor carrying capacities; the use of shuttles and other types of high capacity transportation; providing sufficient and well-maintained facilities; improving the trail system; meeting the recreation expectations of a diverse population; and most importantly, preparing a Master Recreation Plan that will lay out the specific actions to be taken over the next 20 years to achieve desired Monument conditions.

With respect to Visitor Reception, Information, and Education, one of the questions asked under the 4 key issue categories identified in the EA through internal and external scoping is bullet point 5 under Sustainable Recreation and Use (Draft EA page 10):

*“How could the Forest Service address the need to provide meaningful visitor information and environmental education and interpretation programs that are relevant to diverse visitors?”*

In the existing Forest Plan (Part 2, Page 111), REC 4 - Conservation Education covers this question with a single bullet point:

*Visitors have a greater understanding about the significance and importance of forest ecosystems, heritage resources, and the interrelationship between people and the natural environment:*

- *The Forest Service plays a leadership role in environmental stewardship and conservation education partnerships with non-profits, volunteer groups, communities, governments, organization camps and private entities, emphasizing and enhancing the capability of field program and project delivery, especially to underserved populations. Coordination between national forests is promoted for maximum results and cost efficiencies of programs and projects.*

Although we believe this strategy is applicable to the Monument, it doesn't fully answer the scoping question or implement the vision of the Proclamation. Interpretation was emphasized equally with protection in the Proclamation and should be given significant attention in the Monument Plan.

Therefore, similar to the above, we have enhanced this section to propose more detailed management strategies and specific objectives in the Draft Plan. Visitor reception, information and education is crucial to providing an excellent visitor experience; imparting an understanding of the objects of interest and Southern California's rich cultural heritage; and improving the sustainability of recreational activities within the Monument and surrounding Forest. We believe education is the best way to minimize visitor impact, protect the objects of interest and achieve sustainable recreation goals.

Topics that the Collaborative believes should be particularly emphasized in the Draft Plan include the development of a Master Visitor Reception, Interpretation and Education Plan; preparation of multilingual, culturally relevant interpretation and education materials; and youth engagement, activities, particularly those targeting at-risk communities.

In both of the above sections, the Collaborative wants the Draft Plan to contain creative measures to engage this region's diverse community and strive to provide access to recreation, education and volunteer opportunities for all. Executive Order 12898 requires each federal agency to achieve environmental justice as part of its mission. The U.S. Commission on Civil Rights emphasizes compliance with Title VI and 12898 by all federal agencies and recipients of federal funding. As such, the Forest Service has a critical role to play to alleviate disparities in park access and health based on race, color, national origin, and income. The San Gabriel Mountains National Monument can help relieve those disparities. By providing additional opportunities to members of our vulnerable, environmentally burdened, and underserved communities of color and low income communities, we make these areas healthier, cleaner, and more sustainable places in which to live, learn, work, play, pray and age.

### 7. Heritage Resources

This section of the Draft Plan is confusing as written. Multiple phrases<sup>2</sup> are used to refer to heritage resources within the Monument without clear definitions being provided in either the Draft Plan or the underlying Forest Plan. Consequently, it was unclear as to whether the Forest Service intended for these different phrases to refer to different subsets of heritage resources and apply different actions and protections to each; or if these multiple phrases were merely the result of creative writing and intended to result in identical actions and protections. In order to eliminate any confusion, we suggest standardizing the phrasing of this section to refer only to heritage resources and to include a clear definition within the

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<sup>2</sup> Heritage resources, historic resources, Native American heritage resources, historic properties, cultural properties, heritage sites, cultural heritage sites, heritage resource sites, and historic sites.

Plan. We have done this in our suggested edits. If these phrases are specifically defined in another Forest Service document, then a reference to that document and where it can be located is needed. In addition, for clarity and to assist with public comprehension, the definitions should also appear in this plan along with any additional explanatory text needed for the plan to be clearly understood.

The Collaborative supports the concept of designating Priority Heritage Assets, but again, requests that the Draft Plan include a clear definition of this phrase as well as an explanation of how these assets will be designated within the Monument. In our Plan markup, we define this phrase to refer to that subset of heritage resources that are either the most significant or the most at risk and which will receive enhanced monitoring and protection. In addition, the Draft Plan language relating to how Priority Heritage Assets will be treated in wilderness areas versus in other areas of the Monument is also unclear. Although we have suggested clarifying edits, we are not certain our edits are consistent with Forest Service intent. The Collaborative's position is that we believe Priority Heritage Assets should be treated in a similar fashion in all areas of the Monument.

Overall, the language in the Heritage Resources section focuses too much on the specific heritage resource examples identified in the Proclamation and not enough on the Proclamation's goal of protecting all heritage resources in the Monument. For example, language in the Draft Plan states in one place that only historic and Native American resources eligible for the National Register of Historic Places will be protected and preserved. This is not consistent with either the Proclamation or existing law. We have expanded the Draft Plan language to be more inclusive of all heritage resource sites and suggest that all unevaluated resources be treated, at minimum, as National Register eligible, with management protection considered for sites that are evaluated and found not to meet the eligibility standards where appropriate. We also suggest that a list of interested members of the public be developed and maintained to provide the opportunity to participate in Section 106 consultations as consulting parties.

Similarly, it is standard practice to resurvey, monitor, and update site locations for all cultural resources at 5-year intervals or as vegetation or topographical changes occur. The language in the plan was unclear, but it appears that the Forest Service is only proposing to monitor Priority Heritage Assets. Only protecting a subset of assets is not consistent with the intent of the Proclamation. Post-fire archaeological surveys and monitoring of site locations are also recommended for managing the integrity of documented sites, as well as allowing for the identification of previously unknown resources. Although Burned Area Emergency Response (BAER) surveys are currently being performed, we are uncertain if they include the level of historic resource review that is typically conducted.

In order to enhance available resources to conduct the recommended monitoring and surveys, we have suggested that the Forest Service partner with the Society for California Archaeology (SCA) and utilize the California Archaeological Site Stewardship Program (CASSP), which educates volunteers and assigns them to monitor specific site locations for disturbance, looting, and overall integrity. The Site Stewards visit their assigned site locations during their personal recreational use in the area. The SCA stewardship program is very successful and would be well suited for the Monument. Expanding partnerships with local universities will also provide additional resources for these activities.

Finally, the Draft Plan only refers to evaluation of listing with the National Register of Historic Places. Certain sites within the Monument, such as the Mt. Wilson Observatory, may qualify for the National Historic Landmarks Program. In addition, resources that do not qualify for the National Register may qualify for the State Register. Sites might also qualify for the California Native Heritage Commission's Sacred Lands File. All three types of listings should be considered for each heritage resource. We have expanded the heritage resource evaluation bullet to include all types of listings and all heritage resources

identified within the Monument. After evaluating the specific resources identified in the Proclamation, we recommend prioritizing the remaining sites for evaluation of eligibility.

None of our comments on heritage resources are intended to alter requirements to comply with state and federal statutes and regulations protecting these resources; however, the Collaborative believes the Proclamation mandates a higher standard for the Forest Service's management of identified heritage resources.

### 8. Biological Resources

This section also focuses too much on the specific biological resource examples identified in the Proclamation and not enough on the full list of species that the Proclamation intends to protect.

Further, the language in Desired Condition 1 is vague and subject to misinterpretation. This condition refers to "species specifically listed in the proclamation." The Collaborative assumes this language is intended to refer only to rare species such as the Santa Ana sucker. However, all 300 California endemic species are "specifically listed" in the Proclamation, as well as most of the common tree species in the forest including bigcone Douglas fir, Jeffrey pine, sugar pine, and white fir; the song sparrow; and mule deer. These named species do not require specific habitat protection. On the other hand, other species that are considered objects of interest but are not listed by name in the Proclamation might require such protection.

In order to truly determine what additional protections are needed for biological resources, the first step is to compile the specific list of objects of interest that the Collaborative has requested above in relation to biological resources. From that, a shorter list of species, habitats and plant communities that may require additional attention can be compiled. When determining which species require additional attention, existing habitat conservation plans, natural community conservation plans and approved species management plans, such as the West Fork of the San Gabriel River Long Term Management Plan should be considered.

In addition, the list of indicator species monitored within the Monument should be reviewed to ensure true representation of the diversity of habitats and species identified as objects of interest, including all threatened, endangered, candidate, and species of special concern, both federal- and state-listed, as well as rare plant communities occurring within the Monument.

Finally, an active and proactive management strategy that emphasizes conservation and habitat restoration that balances human impacts and the health of the forest should be implemented.

### 9. Climate Change

Recent modeling of potential future climate scenarios in the Southern California Area has identified potentially significant shifts in rainfall, temperature and the distribution of species. These potential changes must be taken into consideration in the management of the Monument. However, to date, it does not appear that the Forest Service has performed the analysis necessary to determine what more may be needed to protect the biological and watershed objects of interest in the Monument due to climate change. This is necessary in order to ensure that the Draft Plan is sufficient to protect the objects of interest as required by the Proclamation and is also a mandatory requirement of the 2012 Planning Rule (36 CFR 219.8(a)(1)(iv)) and Forest Service guidance documents (FSH 1909.12\_20, Sections 23.11, 23.11a, and 23.11b), which state,

*“(a) Ecological sustainability. (1) Ecosystem Integrity. The plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore structure, function, composition, and connectivity, taking into account: ... (iv) System drivers, including ... climate change; and the ability of terrestrial and aquatic ecosystems on the plan area to adapt to change.” (36 CFR 219.8(a)(1), FSH 1909.12\_20, Section 23.11b)*

Although all elements of the 2012 planning rule do not need to be completed for plan amendments, those elements that are critical to the implementation of the amendment do need to be addressed. This analysis was not performed for this EA, but is vital to developing a robust adaptive management plan for the objects of interest in the Monument as conditions change, including ensuring adequate habitat connectivity.

Consistent with the Collaborative’s desire for the Monument Plan to take a long-range view of the future in all areas, the impact of climate change to the objects of interest in the Monument needs to be assessed and used to develop Desired Conditions, Objectives and Management Actions to adaptively manage this impact, particularly in regards to simultaneously protecting the Monument’s biological and watershed resources, and managing the interaction between the two. In order to best manage this interaction, early assessment and long-range planning is critical. This topic is of particular interest to the Collaborative, since the Monument supplies 30% of Angeleno’s drinking water, contains regionally important flood control facilities, and supports rare populations of native fish.

Since it is no longer possible to conduct this work in the timeframe needed to issue the Monument Plan, the Collaborative has included this requirement as a Management Approach and Objective in the Draft Plan. Because of its importance, the Collaborative recommends that this work occur in concert with affected state and local biological and water management agencies, subject matter experts, and all interested stakeholders.

### 10. Energy Resources (Mining)

Over the last 2 years, Collaborative members have consistently expressed their concern with illegal mining within the Monument, the lack of adequate enforcement, and aquatic and riparian degradation attributable to these activities. However, the Draft Plan and EA are silent on this subject. In the past, the Forest Service has indicated that it does not have the authority to issue citations for illegal mining activities. The Proclamation directs the Secretary of Agriculture to “promulgate such management rules and regulations that are necessary for the protection of the objects of interest,” which include these aquatic and riparian zones. The Collaborative believes that the Proclamation and other existing authorities allow the Forest Service to develop regulations permitting the issuance of citations. Therefore, the Collaborate has added an objective for the Forest Service to promulgate regulations that will allow it to cite for mining infractions.

### 11. Suitability of Lands

#### a. Critical Biological Zones

Existing Draft Plan language could potentially interfere with the East Fork Project (aka Cattle Canyon Project) and future projects such as the one along the North Fork that are intended to improve both recreational opportunities and the protection of aquatic species in these concentrated use areas. We have suggested wording changes in the Critical Biological Zone definition to at least allow for species-beneficial new infrastructure projects.

## b. Infrastructure and Water

The Draft Plan does not sufficiently reflect the degree of importance attached to water management activities and infrastructure located within the Monument.

The Proclamation states:

“Nothing in this proclamation shall be construed to interfere with the operation or maintenance, nor with the replacement or modification within the existing authorization boundary, of existing water resource, flood control, utility, pipeline, or telecommunications facilities that are located within the monument, subject to the Secretary of Agriculture's special uses authorities and other applicable laws. Existing water resource, flood control, utility, pipeline, or telecommunications facilities located within the monument may be expanded, and new facilities may be constructed within the monument, to the extent consistent with the proper care and management of the objects protected by this proclamation, subject to the Secretary of Agriculture's special uses authorities and other applicable law.”

Because this is a unique reservation that may not be true for all Monuments, the Collaborative would like to explicitly capture this language within the Draft Plan.

Similarly, due to the importance surrounding the issue of water rights, adjudications, and water management activities, we would like to capture language from both the Proclamation and the Regional Forester's October 31, 2014 letter (EA, Appendix D) that state that the Draft Plan will not interfere with valid existing rights, judgments, or court orders related to these activities.

Finally, water conservation and flood control are important activities that were specifically identified in the Proclamation; however, they are not covered by any of the suitable use categories identified in Table 1 “Suitable uses commodity and commercial uses, San Gabriel Mountains National Monument.” Therefore, a line item has been suggested to clearly reference them.

## 12. Transportation Plan

Transportation planning has been a significant topic of discussion within the Collaborative and we are pleased that the Forest Service has included many of the concepts we have discussed within the Draft Plan. However, the Collaborative would like a more detailed standalone plan in this area since a previous Transportation Plan does not exist. The Collaborative believes that a robust Transportation Plan should address not only the protection of the objects of interest, but also other Proclamation priorities such as sustainable recreation, watershed protection, and environmental justice for urban residents by means of improved community access to the Monument. Therefore, the Collaborative has suggested additional descriptive language, desired conditions, objectives, and management approaches consistent with this broader focus.

Because the Draft Plan emphasizes roads and vehicle traffic while lacking specificity on the trail network, the Collaborative has significantly enhanced the discussion of trails in order to better balance the focus between the two. Other topics that the Collaborative believes should be particularly emphasized in the Plan include coordinating with gateway communities about access points and parking near access points; avoiding road upgrades that would significantly increase vehicular traffic; developing alternative and mass transit options in cooperation with local and regional transportation providers; improving maintenance and the condition of the road and trail network; improving wayfaring signage; and most

importantly, developing a more detailed Master Transportation Plan to guide future transportation projects within the Monument and linkages to external road and trail transportation networks.

Finally, as previously discussed, the Collaborative believes that the intent of the Proclamation to determine if there are conflicts between the objects of interest and the existing transportation network is very important. Therefore, the Collaborative has included this activity as a Management Approach and Objective in the Draft Plan, to be conducted after the complete list of objects of interest has been identified.

Thank you for this opportunity to provide our feedback on the Draft Plan. We encourage the Forest Service to adopt changes to the Draft Plan that incorporates our input. We are happy to meet with you at any time to discuss our suggestions and concerns.

Best Regards,

### **The San Gabriel Mountains Community Collaborative**

- Jacqueline Ayer, Association of Rural Town Councils
- Kathryn Barger, LA County Board of Supervisors – 5<sup>th</sup> District (Antonovich)  
*Alternate* – Brian Mejia, LA County Board of Supervisors – 5<sup>th</sup> District
- Dale Benson, California Department of Transportation, District 7  
*Alternate* – Linda Taira, California Department of Transportation
- Tim Brick, Arroyo Seco Foundation
- Josh Candelaria, San Bernardino County Board of Supervisors (Rutherford)  
*Alternate* – Andy Silva, San Bernardino County Board of Supervisors
- Margaret Clark, Councilwoman, City of Rosemead; Board Member, Rivers & Mountains Conservancy  
*Alternate* - Mark Stanley, Rivers & Mountains Conservancy
- Ann Croissant, San Gabriel Mountains Regional Conservancy  
*Alternate* - Wendy La, San Gabriel Mountains Regional Conservancy
- Ron Ellingson, Mt. Baldy
- William Estrada, Curator and Chair, History Department, Natural History Museum of Los Angeles County
- Dianne Erskine Hellrigel, Executive Director, Community Hiking Club
- Belinda Faustinos, San Gabriel Mountains Forever  
*Alternate* – Jessica Strickland, Trout Unlimited
- Robert Garcia, The City Project  
*Alternate* – Nancy Negrete, The City Project
- Kelly Gardner, San Gabriel Valley Water Association
- Armond Ghazarian, Los Angeles Department of Public Works
- Omar Gomez, Consejo de Federaciones Mexicanas en Norteamérica (COFEM)
- Richard Guttenberg, Archeology/Culture

## San Gabriel Mountains Community Collaborative

- Cliff Hamlow, San Gabriel Valley Legislative Coalition of Chambers
- Henry Herrera, CalFire
- Grace J. Kast, Gateway Water Management Authority
- Joseph Lyons, Councilperson, City of Claremont; Representative, San Gabriel Valley Council of Governments
- Mark Masaoka, Asian Pacific Policy & Planning Council (A3PCON)  
*Alternate* – Jackson Lam, Asian Pacific Policy & Planning Council
- Mike McNutt, Palmdale Water District
- Steve Messer, Concerned Off-Road Bicyclists Association (CORBA)  
*Alternate* – Jenny Johnson, Mount Wilson Bicycling Association
- John Monsen, The Sierra Club
- Chuck Myers, National Forest Homeowners  
*Alternate* – Roy Glauthier, National Forest Homeowners
- Judy M. Nelson, Councilwoman, City of Glendora
- Michelle Nuttall, Southern California Edison
- Daniel Oaxaca, San Gabriel Valley Conservation Corps  
*Alternate* – Daniel Prescott, San Gabriel Valley Conservation Corps
- William Reeves – Fisheries Resource Volunteer Corps  
*Alternate* – John Tobin, Pasadena Casting Club
- Liz Reilly, Councilwoman, City of Duarte; Representative, San Gabriel Valley Council of Governments
- Claire Robinson, Amigos de los Rios
- Tamera Robinson, Equestrian  
*Alternate* – Irma “Kelly” Carle, Antelope Valley Unit, Backcountry Horseman of California
- Dan Rosenfeld, Community Partners and Trust for Public Land
- Daniel Rossman, The Wilderness Society
- Jack Sahl, Friends of the Angeles
- Andrew Salas, Gabrieleño Band of Mission Indians - Kizh Nation  
*Alternate* - Gary Stickel, Gabrieleno Band of Mission Indians - Kizh Nation
- Chris Solek, Council for Watershed Health
- Rick Travis, California Rifle and Pistol Association
- Ben Smith, Mountain High  
*Alternate* – Paul Bauer, Mountain High & Stevens Pass
- *Alternate* – Amy Granat, California Off-Road Vehicle Association (CORVA)

cc:

Sen. Dianne Feinstein (D-CA)  
Sen. Barbara Boxer (D-CA)  
Rep. Paul Cook (R-Yucca Valley)  
Rep. Lois Capps (D-Santa Barbara)  
Rep. Steve Knight (R-Palmdale)  
Rep. Julia Brownley (D-Oak Park)

Rep. Judy Chu (D-Monterey Park)  
Rep. Adam Schiff (D-Burbank)  
Rep. Tony Cardenas (D-San Fernando Valley)  
Rep. Brad Sherman (D-Sherman Oaks)  
Rep. Pete Aguilar (D - Fontana)

Rep. Grace Napolitano (D-Norwalk)  
Rep. Ted Lieu (D-Torrance)  
Rep. Xavier Becerra (D-Los Angeles)  
Rep. Norma Torres (D-Pomona)  
Rep. Raul Ruiz (D-Palm Desert)  
Rep. Karen Bass (D-Los Angeles)  
Rep. Linda Sánchez (D-Orange)  
Rep. Ed Royce (R-Fullerton)  
Rep. Lucille Roybal (D-Los Angeles)  
Rep. Mark Takano (D-Riverside)  
Rep. Ken Calvert (R-Corona)

Rep. Maxine Waters (D-Inglewood)  
Rep. Janice Hahn (D-Compton)  
Rep. Mimi Walters (R-Laguna Niguel)  
Rep. Loretta Sanchez (D-Anaheim)  
Rep. Alan Lowenthal (D-Long Beach)  
Rep. Dana Rohrabacher (R-Costa Mesa)  
Rep. Darrell Issa (R-Vista)  
Rep. Duncan D. Hunter (R-Lakeside)  
Rep. Juan Vargas (D-San Diego)  
Rep. Scott Peters (D-La Jolla)  
Rep. Susan Davis (D-San Diego)

## Appendix C. San Gabriel Mountains National Monument Management Plan

### Chapter 1 – Introduction

#### Purpose of Monument Plan

On October 10, 2014, President Barack Obama designated 346,177 acres of existing Federal lands as the San Gabriel Mountains National Monument (Monument) in an executive action, proclaiming the eighth national monument under Forest Service management. A national monument is a designation given to a protected area of Federal land. The Proclamation for the Monument mandated the preparation of a management plan for the Monument within 3 years. The Monument Plan will be developed according to new regulations adopted in 2012, referred to in this document as the 2012 Planning Rule.

The purpose of this management plan is to provide strategic direction and guidance for future management of the Monument. This management plan provides direction and guidance for the protection and interpretation of the scientific and historic objects of the Monument, as well as continued public access to those objects consistent with their protection. It provides a framework for informed decision making, while guiding resource management, practices, uses, and projects. The management plan does not include specific project and activity decisions. Project level decisions will be made at a later date, after additional detailed analysis and further public involvement. The management plan is adaptive in that it can be amended to update management direction based on new knowledge and information. [As part of the public engagement process required by the Proclamation and defined in the 2012 Planning Rule, the Community Collaborative and other interested stakeholders will continue to be included in future planning and implementation decisions made by the Forest Service.](#)

This management plan is strategic in nature and does not attempt to prescribe detailed management direction to cover every possible situation. While all components necessary for protection and interpretation of the scientific and historic objects of the Monument are included, the management plan also provides flexibility needed to respond to uncertain or unknown future events and conditions such as fires, floods, climate change, changing economies, and social changes that may be important to consider at the time future decisions are made.

[In all cases, consideration of the biological, historical, cultural, recreational, infrastructure, and watershed resources, including the provision of drinking water and flood controls services, are managed in a balanced and mutually beneficial fashion. All interested parties will be included in the process.](#)

This management plan has been prepared pursuant to the requirements of the National Forest Management Act of 1976, and the 2012 Forest Service planning regulations (36 CFR 219) This management plan is also accompanied by an Environmental Assessment (EA) as required by the regulations used in its development (36 CFR 219.13).

The scientific and historic objects identified in the proclamation (referred to as the “objects of the Monument) which are the focus of this management plan include:

- **Cultural Resources** – The San Gabriel Mountains contain a rich cultural history, including a unique concentration of several rock art and cupules features within the Aliso-Arrastre Special

Interest Area, the remnants of the historic mining town of Eldoradoville on the East Fork of the San Gabriel River, and the remnants of historic resorts of the early 20th century, on which foundations the current Forest Service campgrounds are constructed.

- **Modern Recreation** – The San Gabriel Mountains also contain 87 miles of the Pacific Crest National Scenic Trail and several other national recreation trails. Four designated wilderness areas are within the mountains (San Gabriel, Sheep Mountain, Pleasant View Ridge, and Magic Mountain), providing backcountry experience for Monument visitors.
- **Scientific Significance** – Two important scientific facilities are within the national monument. The Mt. Wilson Observatory has hosted world-class scientists for critical discoveries of the early 20th century. The San Dimas Experimental Forest, also established in the early 20th century, has continued study of research watersheds from early years.
- **Wildlife and Habitat** – [Numerous rare and endangered aquatic species exist within the Monument, with some endemic only to the San Gabriels. These include the threatened Santa Ana Sucker and California Red-legged Frog, endangered mountain yellow-legged frog and arroyo toad, and the rare arroyo chub and Santa Ana speckled dace.](#) The mountains also provide important habitat for [other](#) endangered and sensitive wildlife species, including the California condor, least Bells’ vireo, Nelson’s bighorn sheep, bald eagle, and California spotted owl, as well as connectivity corridors for many species, including mountain lions.
- **Infrastructure** – Flood control and water storage, delivery and diversion infrastructure exist within the Monument, including six large retention dams. Numerous telecommunications and utility towers are also present within the mountains, reflecting the needs of the nearby urban areas.
- **Watershed Values** – [Numerous rare and endangered aquatic species exist within the Monument, with some endemic only to the San Gabriels. These include the threatened Santa Ana Sucker and California Red-legged Frog, endangered mountain yellow-legged frog and arroyo toad, and the rare arroyo chub and Santa Ana speckled dace.](#) [The San Gabriel Timberland Reserve, predecessor to the Angeles National Forest, was originally established to protect the region’s primary source of drinking and irrigation water, as well as to manage fires and deforestation in order to guard against floods. The watershed includes several important and scenic rivers, lakes and waterfalls that provide drinking water, wildlife habitat and recreation opportunities.](#)
- **Scenic Areas** – Within the Monument, many dramatic sights draw visitors every year, from San Antonio Falls, to Crystal and Jackson lakes.
- **Vegetation Communities** – The San Gabriels provide a wide diversity of vegetation communities, including high-elevation White fir, ancient limper pines, mixed conifer forests, bigcone Douglas-fir, pinyon pine chaparral and oak woodlands, and Joshua trees.

## Planning Area

The planning area includes all National Forest System (NFS) lands within the boundaries of the San Gabriel Mountains National Monument in the northern and southeastern portions of the San Gabriel Mountain Range, approximately 30 miles northeast of Los Angeles. The Monument covers 342,177 acres of the Angeles National Forest and 4,030 acres of neighboring San Bernardino National Forest. Figure 1 shows the current administrative boundaries of the Angeles National Forest subunits, known as ranger districts, overlaid by the Monument boundary.

## Management Planning Overview

United States Forest Service (USFS) land management planning is an adaptive process that includes plan development, monitoring, and adjustment based on desired social, economic, and ecological conditions and the evaluation of impacts to those conditions. The overall purpose of planning is to ensure responsible land management based on current information that guides land stewardship to best meet the needs of the

American people.

### Relationship of this Management Plan to Other Planning Documents

This management plan will amend the current land management plan (LMP), as amended. Specifically, the plan components listed in this management plan will supersede the plan components listed:

- 1) Forest Plan Part 1 – Goal 3.1, related to Managed Recreation in a Natural Setting;
- 2) Forest Plan Part 1 – Goal 4.1, related to Energy and Minerals Production;
- 3) Forest Plan Part 2 – Land Use Zones (as amended by 2014 land use plan amendment), related to Wilderness Areas and suitable uses allowed within land use zones;
- 4) Forest Plan Part 2 – Prospectus, related to Heritage Resources; Forest Plan Part 2 – Place-Based Program Emphasis, related to Wilderness Areas;
- 5) Forest Plan Part 2 – Appendix A: Inclusion of the description of current wilderness areas;
- 6) Forest Plan Part 2 – Appendix B: Strategies, related to [Management Indicator Species \(MIS\)-species](#), Recreation, Transportation, Minerals Off-Highway Vehicle Use Opportunities; and
- 7) Forest Plan Part 3 – Standard S34 and Appendix D, related to the framework for regulation of recreational uses.

The resource direction contained in the rest of the LMP will apply to the Monument, unless specifically noted in the San Gabriel Mountains National Monument Management Plan.

### Scope and Applicability of this Management Plan

The San Gabriel Mountains National Monument Management Plan applies to all NFS lands and activities within the boundaries of the San Gabriel Mountains National Monument. Before authorizing any specific project or land-use activity within the Monument, the Forest Service must complete a more detailed and site-specific environmental analysis, pursuant to the NEPA and its implementing regulations. When a specific project or activity is proposed on NFS land, additional public involvement occurs, site-specific effects are analyzed, and decisions are made regarding specific projects and other activities.

### Management Plan Organization, Content, and Terminology

The Monument plan is comprised of new management direction for the Monument, as well as existing direction from the Angeles National Forest land management plan.

Forest goals and desired conditions from Part 1; land use zones, suitable land uses, program emphases, and objectives from Part 2; and standards and guidelines from Part 3 of the existing Angeles National Forest land management plan will continue to apply within the Monument.

In addition, plan components described below that apply to the Monument will be adopted. The Monument management area follows the proclaimed boundary of the Monument. Management area direction related to roads, trails, and energy and minerals production supersede direction in the existing Angeles National Forest land management plan where there is conflicting direction.

The new San Gabriel Mountains National Monument management area and its associated plan components will amend the existing land management plan for the Angeles National Forest.

The Monument management area includes five plan components that guide future project and activity

decision making: desired conditions, objectives, standards, guidelines, and suitability of lands. All projects and activities within the Monument need to be consistent with these plan components.

A **desired condition** is a description of specific social, economic, and/or ecological characteristics of the plan area, or a portion of the plan area, toward which management of the land and resources should be directed. A desired condition description is specific enough to allow progress toward achievement to be determined but does not include a completion date.

An **objective** is a concise, measurable, and time-specific statement of a desired rate of progress toward a desired condition or conditions. Objectives are based on reasonable foreseeable budgets.

The **suitability of lands** is determined for specific lands within the plan area. The lands are identified as suitable or not suitable for various uses or activities based on desired conditions applicable to those lands. The suitability of lands is not identified for every use or activity. If certain lands are identified as not suitable for a use, then that use or activity may not be authorized.

A **standard** is a mandatory constraint on project and activity decision-making, established to help achieve or maintain the desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements.

A **guideline** is a constraint on project and activity decision-making that allows for departure from its terms, so long as the purpose of the guideline is met. Guidelines are established to help achieve or maintain the desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements.

**Management approaches** are also listed for the Monument management area and are considered to be other plan content. Management approaches describe the principal strategies and program priorities the Angeles National Forest intends to use to carry out projects and activities under the Monument plan. Management approaches may discuss potential processes such as analysis, assessment, inventory, project planning or monitoring.

Comment [NFF1]: Bold this title

**Figure 1. San Gabriel Mountains National Monument**

## Chapter 2 – San Gabriel Mountains National Monument Management Area

### Introduction

The Proclamation requires a management plan be written for the Monument and directs that the management plan ...

...provide for protection and interpretation of the scientific and historic objects identified above and for continued public access to those objects, consistent with their protection. To the maximum extent permitted by other applicable law and consistent with the purposes of the monument, the plan shall protect and preserve Indian sacred sites, as defined in section 1(b) of Executive Order 13007 of May 24, 1996, and access by Indian tribal members for traditional cultural, spiritual, and tree and forest product-, food-, and medicine-gathering purposes.

The scientific and historic objects identified in the Proclamation include cultural resources, recreational and scenic features, scientific features, diverse wildlife and aquatic species, vegetative communities, and infrastructure.

The resource direction contained in the LMP will continue to apply within the Monument, unless specifically noted. Where the resource direction found in the LMP has been amended for the San Gabriel Mountains National Monument, these changes will be noted in each resource section below. In addition, plan components designed specifically to address the San Gabriel Mountains National Monument will be adopted. These plan components are listed below and will supersede the plan components listed in the LMP.

Please note the organization of the desired conditions, objectives, standards, and guidelines is intended to match the terms of the 2012 Planning Rule. Objectives are aspirations, not commitments or final project decisions. Implementation and achievement would rely upon sufficient funding and staffing levels.

#### Consistent with the Proclamation, nothing in this Management Plan

...shall be construed to interfere with the operation or maintenance, nor with the replacement or modification within the existing authorization boundary, of existing water resource, flood control, utility, pipeline, or telecommunications facilities that are located within the monument, subject to the Secretary of Agriculture's special uses authorities and other applicable laws. Existing water resource, flood control, utility, pipeline, or telecommunications facilities located within the monument may be expanded, and new facilities may be constructed within the monument, to the extent consistent with the proper care and management of the objects protected by this proclamation, subject to the Secretary of Agriculture's special uses authorities and other applicable law.

Further, nothing in this plan shall be construed to alter the valid existing water rights of any party, including the United States; alter the jurisdiction of any water master or public agency responsible for groundwater or surface water management or groundwater replenishment; interfere or conflict with any judgment or court order issued pursuant to any adjudication respecting water, water rights or water management in the San Gabriel River or Lytle Creek

watersheds and basin; nor impede any previously authorized Los Angeles County Drainage Area (LACDA) project, as described in the U.S. Army Corps of Engineers' LACDA Review: Final Feasibility Study Interim Report and Environmental Impact Statement, issued in 1991 and revised in 1992, including any supplement or addendum to that report.

This plan does not apply to non-federal land inholdings within the Monument.

## Vision

The San Gabriel National Monument acts as the recreational and educational gateway to the San Gabriel Mountains and California's National Forests. The Monument offers significant interpretation and educational opportunities that contribute to a greater understanding of the region's natural, cultural, and scientific heritage while fostering new generations of environmental stewards. The Monument hosts important infrastructure including flood control and water storage, delivery and diversion, pipeline, utility, and telecommunication facilities. Scientific and historic objects are preserved and protected for future generations. A variety of sustainable recreation opportunities and well-maintained facilities are available to the public. Visitors of all ethnicities and backgrounds feel welcome. A variety of transportation options and adequate parking exists to accommodate visitor needs. Monument operations are conducted in harmony with local gateway communities. Monument management actions respect, value, and balance environmental protection, public safety, recreation, water management and infrastructure needs. Collaboration, coalitions, partnerships and joint planning with local and regional entities are used to the maximum extent in achieving Monument goals and desired conditions.

## Universal Objectives [Goals]

1. Work with subject matter experts and interested parties to develop a comprehensive list of the objects of interest within the Monument, their location, and status within [1] year.

## Universal Standards

1. The Forest Service special use authorization rules, directives, and processes will continue to apply. All projects must be designed, constructed, and maintained consistent with the proper care and management of the objects of interest.

## Universal Guidelines

1. All projects, including habitat restoration projects or expansion of recreation activities, shall assess potential conflicts with objects of interest, existing recreation activities, public safety, water management and flood control activities, existing and approved infrastructure, and maintenance activities. Identified conflicts shall be eliminated or otherwise resolved prior to project implementation.

## Universal Management Approaches

1. Work with community partners and non-profit organizations to secure the resources necessary to implement management approaches and complete objectives to attain desired conditions.
2. Expand volunteer and docent opportunities within the Monument to achieve Desired Conditions.
3. Utilize an active management approach.
4. Strive to work and consult with all affected and interested parties when making management decisions.
5. Partner with and contract out low-to-mid skill level work done within the Monument (graffiti removal, brush clearing, trash clean up, trail maintenance, et cetera) to local workforce development agencies, with particular consideration for those that focus on youth.

## Sustainable Recreation

The creation of the National Monument has resulted in an enhanced emphasis on sustainable recreation opportunities attractive to Southern California’s diverse community and visitor base.

### Desired Conditions

1. Recreation opportunities, including products, services, and the built environment, support the needs and expectations of the diverse population in the surrounding area, including urban visitors, youth, people with disabilities, aging populations, and different ethnic groups.

*[Original Desired Conditions 2-5 have been moved to the Visitor Reception, Information and Education Section]*

2. Visitors will experience outstanding recreational conditions, meeting the expectations and needs of a growing and increasingly diverse visitor population throughout the National Monument, including the concentrated use areas along the San Gabriel River.
3. Visitors will have access to high quality recreational support facilities and infrastructure, including readily available and functioning restrooms, trash collection, and information services.
4. The Monument will support a wide variety of sustainable recreational opportunities including, but not limited to: fishing, hiking, trail running, photography, interpretive trail walks, mountain biking, camping, backpacking, cycling, hunting, recreational shooting, recreational driving, water play, snow play, OHV use, rock climbing, wildlife observation, wilderness area visits, nature discovery, historical appreciation, and cultural history experiences.
5. Recreational opportunities will appeal to and fulfill the needs of a broad range of abilities, fitness levels, and desired visitor experiences.
6. A comprehensive, well-maintained and sustainable trail system with multilingual trailhead information will be provided throughout the Monument. The trail system will include ADA accessible interpretive trails.
7. Management of visitor capacity and implementation of public safety measures considers visitor experiences and resource protection needs within the Monument.
8. Visitors of the multiple ethnicities that comprise Southern California will feel welcomed to the National Monument.
9. Signs are universal and public information and education is multilingual to ensure communication is intentional, meets information needs, and conveys a message of public access for all.

### Objectives [Goals]

1. Complete the sustainable recreation carrying capacity studies identified in Management Approach 2 within [three] years.
2. Complete the assessment of recreational infrastructure identified in Management Approach 4 within [three] years.
3. Complete the recreation facility survey identified in Management Approach 6 within [four] years.
4. Complete and initiate the implementation of the comprehensive Master Recreation Plan identified in Management Approach 1 within [four] years.
5. Complete the development of criteria for special events and emerging uses identified by Management Approach 8 within [five] years.

### Guidelines

1. Along the Pacific Crest National Scenic Trail within the Monument, new recreation events, such as foot races or horseback endurance events and fundraising events should be limited to designated crossings

only. Existing recreation events may be allowed to continue at current levels.

*[Original Guideline 2, Moved to Transportation Plan Guidelines]*

2. Ensure that any new trail or road construction complies with the most recent Forest Service Trails Construction and Maintenance Notebook, employing current, state-of-the-art trail design and sustainability principles. (Forest Service Trails Construction and Maintenance Notebook, 2300–Recreation, July 2007, 0723-2806-MTDC)

*[Original Guideline 3, Moved to the Visitor Reception, Information and Education Section]*

#### Management Approaches

1. Develop a comprehensive Master Recreation Plan designed to provide an outstanding visitor experience that meets the needs of the Monument’s diverse user base and achieves the desired conditions. The plan would include, but not be limited to, inclusionary elements to appeal to multicultural users, interpretive trails, recreational visitor education programs, and additional support facilities.
2. As a component of the Master Recreation Plan, develop a Master Trails Plan that:
  - Assesses the condition, maintenance needs, and sustainability of all existing system and non-system trails.
  - Prioritizes high-value, high-use trails for maintenance and sustainability improvements.
  - Identifies opportunities for new trails to provide a broader range of experiences, connectivity to other trails and points of interest, and expanded opportunities for a growing population.
  - Identifies non-system trails that may be candidates for inclusion in the forest trail system or decommissioning.
3. Prioritize work with external partners to ~~develop~~ conduct sustainable recreation studies, develop recreation design plans, new products, or recreation design features to improve recreation management within the Monument and ensure relevance to the Monument’s diverse visitor use base.
4. Actively manage recreation in concentrated use areas such as the San Gabriel River to improve recreational quality. Mitigate impact on aquatic species through dispersed recreation, designated river access points, transit stops, designated parking, and high quality support infrastructure and visitor services.
- ~~4.5.~~ Evaluate the need for sustainable recreation carrying capacity in high-use areas such as San Gabriel Canyon, following the Interagency Visitor Use Management Framework (<http://visitorusemanagement.nps.gov>), including:
  - Identifying visitor capacities and strategies to manage use levels within capacities.
  - Documenting criteria and rationale for establishing visitor capacities based on the best available scientific information.
  - Documenting the relationship between the amount of visitor use and existing conditions and how improved management, facilities and visitor education can increase carrying capacity. ~~actions are expected to affect that relationship.~~
6. Employ strategies for reducing user impact through site design, user education and other tools.

*[Original Item 3 has been moved to the Transportation Plan]*  
*[Original Items 4-6 have been moved to the Visitor Reception, Information and Education section]*
7. Conduct a comprehensive assessment of existing recreational infrastructure, opportunities and needs in the Monument, including an inventory of trails (open, closed, system and non-system) and trail conditions.
8. Identify public facilities in need of improvement, removal, or replacement (including aging developed recreation infrastructure), to better meet current needs and projected future demand. Replacing opportunities lost to closures will be a high priority.

9. Develop criteria for ~~appropriate types of~~ special events ~~and~~, requests, ~~for both existing, long-running events~~ and emerging uses within the Monument ~~to ensure that they are low-impact and sustainable.~~
10. Implement adaptive management processes ~~and strategies~~ at recreation facilities to proactively engage ~~Southern California residents & visitors within the outreach area of the National Monument, including~~ persons with disabilities, contemporary urban visitors, aging populations, diverse ethnic groups, youth, and day-use emphasis (see Appendix C, Monitoring Requirements). (From new text added to REC 3 of Appendix B)
11. Employ applicable elements and strategies described in the 2010 Forest Service Sustainable Recreation Framework (June 25, 2010).

### Visitor Experience, Information and Education

The goal of Visitor Experience, Information and Education services is to develop an integrated, forest-wide program of interpretation and conservation education that will support the proclamation mission to provide access to and interpret the objects of scientific and historic interest present in the Monument. These objects include heritage resources, recreational and scenic features, scientific features, diverse wildlife and aquatic species and habitat, vegetative communities, and infrastructure.

#### Desired Conditions

1. Youth are ~~actively~~ engaged in outdoor recreation and conservation education opportunities ~~through a variety of channels and opportunities~~, fostering the next generation of public land stewards.
2. All visitors will be provided with culturally relevant and easily accessible information to guide and enrich their experience.
3. Interpretative~~on~~ materials capture the rich cultural history that shaped the area, including Native Americans, Spanish missionaries and colonialists, Mexican rancheros, Euro-Americans, and Asian settlers and prospectors.
4. Culturally relevant educational programs are developed with tribal consultation regarding traditional object management, interpretation, traditional uses, tribal history, and other issues of tribal concern within the Monument. This ongoing process is fostered to maintain open communication and collaboration with tribes about their current and historical relationship to the San Gabriel Mountains.
5. Public outreach and education uses ~~traditional and~~ contemporary ~~media outlets~~, social media, newly emerging technologies, and culturally relevant media outlets.
6. ~~Engaging s~~Schools, communities, ~~nonprofits~~, universities, museums, and other educational institutions ~~are engaged invested~~ in elevating public awareness of the environment, conservation, and outdoor recreation. ~~This~~ presents exceptional opportunities to re-imagine ~~and reinforce~~ Angelenos' connections to their ~~forest, Monument, and~~ surrounding ~~public landsforests and open spaces~~.
7. Conservation education focuses on themes of urbanization, ~~watershed values~~, fire, heritage resources, ~~climate adaptation, and~~ wildlife, and plants, which are the main management challenges within the Monument.
8. Forest Service staff and volunteers are fully trained in visitor reception and engagement that is culturally relevant.

#### Objectives [Goals]

1. Develop and implement the Master Visitor Reception, Interpretation and Education Plan with an emphasis on youth within [three] years.
2. Launch a multilingual Monument website within [two] years.
3. Develop new interpretive and educational materials within [three] years.

### Guidelines

1. Maintain or increase the number of conservation education programs/events per year within the Monument.

### Management Approaches

1. Develop a Master Visitor Reception, Interpretation and Education Plan Monument conservation education plan that focuses on engagement of youth in outdoor recreation and conservation opportunities, educates them about the objects of interest, helps foster the next generation of public land stewards, and works towards achieving the Desired Conditions.
2. As additional components of the Master Visitor Reception, Interpretation and Education Plan, include sections on:
  - A comprehensive visitor reception and orientation strategy that includes sufficient volunteer or paid staff positions to meet visitor needs. Consider implementing a docent program in partnership with local community organizations and non-profits.
  - A partnership strategy that identifies ways to engage and leverage resources from local sources including universities, school districts, museums, adjacent municipalities, county agencies, non-profits, foundations, the private outdoor recreation sector, and corporate sponsors.
  - A volunteer engagement and management strategy.
  - A comprehensive training program for Forest Service staff and volunteers developed with an experienced diverse network of multilingual, culturally relevant interpretation and education partners to ensure that all visitor engagement is welcoming and culturally sensitive.
3. Engage and involve a diverse network of multilingual, culturally relevant interpretation and education partners to ensure that every visitor to the forest can access and learn about recreation, education, conservation, volunteer, and stewardship opportunities before a trip to the Monument, upon entering the Monument, and at key recreational, environmental, and cultural sites throughout the Monument.
4. Implement a user-friendly, multilingual dedicated Monument website with comprehensive information about Monument access, recreation, safety, and education opportunities, with broad appeal including to youth and underserved communities.
5. Enhance public education and appreciation of the objects of the Monument through the expansion of interpretive activities, environmental education, and conservation programs to help inform the public about cultural, scientific, historical and archeological sites, tribal traditions, recent history, unique landscape, diverse geology, natural processes, flora and fauna, and watershed values issues within the Monument.
6. Develop interpretative materials and educational activities that capture the rich cultural history that shaped the area to help visitors learn about, gain respect for, and appreciate the objects of the Monument and the ongoing need for their protection and stewardship.
7. Provide multilingual information on how to reach the Monument using public transportation, shuttles, and alternative transportation via culturally relevant media channels, including the Monument web site.
8. Expand the use of multilingual information and outreach including interpretive signs, standard recreation signs, online information and social media, and multilingual personnel such as recreation staff, law enforcement, and volunteers.
9. Provide visitors with high-quality educational opportunities in major high-use recreational areas regarding the natural environment, cultural history, leave no trace ethic, and nature stewardship.
10. Prioritize youth engagement efforts aligned with the Region 5 Integrated Youth Engagement Strategy, and continue participation in programs such as the Southern California Consortium “Generation Green” program and Every Kid In A Park program.

[11. Employ elements and strategies from the 2007 Forest Service Conservation Education Strategic Plan To Advance Environmental Literacy \(Publication FS-879, March 2007\).](#)

## Heritage Resources

[Heritage resources in the Monument include both historic and prehistoric archaeological sites as well as cultural and historic properties. Priority Heritage Assets are those heritage resources that have been determined to require enhanced monitoring and protection, either due to their significance or because they are deemed to be at risk.](#)

### Desired Conditions

- [1. All heritage resources are protected and preserved for cultural and scientific value and public benefit.](#)
- ~~[2. Historic and Native American heritage resources eligible for the National Register of Historic Places are protected and preserved.](#)~~
- ~~[3.2. Priority Heritage Assets are receive enhanced monitoring and protection and enhance the Monument's distinct characteristics.](#)~~
- ~~[4.3. Historic properties](#)~~[Heritage resources](#) within designated wilderness areas are documented and protected, and values and connections between heritage and wilderness values are promoted.

### Objectives [Goals]

- [1. Complete the evaluation and nomination process for the heritage resources listed in Management Approach 6 within \[six\] years.](#)

### Standards

- Road and trail maintenance and use must be managed to prevent adverse effects to values or attributes that make heritage resources eligible for the National Register of Historic Places.

### Guidelines

- Projects should be designed to avoid, minimize, or mitigate adverse effects or impacts to ~~significant-cultural-properties~~[heritage resources](#).
- Heritage ~~sites~~[resources](#) should be protected during fire suppression and rehabilitation activities where feasible.

### Management Approaches

- [1. Review all heritage resources located within the Monument and designate those requiring enhanced monitoring and protection as Priority Heritage Assets.](#)
- ~~[2. Review recorded or documented historic properties](#)~~[heritage resources](#) within designated wilderness to identify any that support or enhance wilderness values and characteristics. Manage these identified resources as Priority Heritage Assets, regularly monitoring ~~un~~identified wilderness Priority Heritage Assets and promoting values and connections between heritage and wilderness values.
- ~~[3. Assess and review documented and unevaluated heritage resources to identify those resources that enhance the Monument's distinct characteristics and to r. Regularly monitor those at risk. Manage these identified resources as Priority Heritage Assets. Of the 44 sites identified within the Monument, those identified as Priority Heritage Assets will be monitored every 5 years. If new resources are identified and determined to be Priority Heritage Assets, they will also be monitored every 5 years.](#)~~
- ~~[4.4. All identified heritage resources within the Monument will be monitored every 5 years. Post-fire flooding and other significant disturbance surveys will also be conducted in order to identify new historic resource locations or update information on existing resources.](#)~~

**Comment [MN2]:** We didn't really understand what distinguished original bullet points one and two. Two only seemed to be a subset of one and could be included in the same point, so we deleted point two in order to streamline the document. Similarly Native American heritage resources are a subset of historic resources, so did not understand why the two needed to be listed separately.

**Comment [MN3]:** Original bullet 1 was very confusing. We have tried to clarify, but could not understand the original intent.

**Comment [MN4]:** How can you monitor an unidentified site.

- 2.5. Use partnerships to develop and implement stewardship plans for heritage resource ~~sites~~, focusing on those sites with recognized significance or at risk from public or land use effects.
- 3.6. Evaluate ~~historic sites~~ heritage resources for appropriate management. Develop site management plans for noteworthy heritage resources.
7. In consultation with tribes, work to improve the interpretative potential of Native American heritage resources within the Monument, focusing on traditional uses, tribal history, and the current relationship of local tribes to the San Gabriel Mountains.
8. Develop partnerships with local universities for student and faculty involvement, including research opportunities, field schools, internships, and other educations programs that may assist the Monument with protection and management of heritage resources
- 4.9. Partner with the Society for California Archaeology (SCA) to employ the California Archaeological Site Stewardship Program (CASSP) to assist with site monitoring.
10. Evaluate the following heritage ~~sites~~ resources for eligibility under the National Register of Historic Places: Aliso-Arrastre Special Interest Area; Eldoradoville, located along the East Fork of the San Gabriel River; Mt. Wilson Observatory; and San Dimas Experimental Forest. Prioritize the remaining heritage resources for evaluation to determine their eligibility for listing. Nominate sites eligible ~~sites~~ for listing following evaluation.
11. Heritage resources with exceptional historical significance and value, such as the Mt. Wilson Observatory, may meet standards for the National Historic Landmarks Program. Evaluate Mt. Wilson Observatory, and any additional heritage site with exceptional historic significance, for nomination as a National Historic Landmark.
12. Heritage resources that do not meet eligibility standards for inclusion to the National Register of Historic Places will be evaluated for eligibility for inclusion to the California Register of Historic Resources.
13. Develop and maintain a list of interested members of the public that will be used to provide the opportunity to participate in Section 106 consultations as consulting parties.

**Comment [MN5]:** Would this be for more than just Priority Heritage Resources? How is “noteworthy” being defined?

## Biological Resources

### Desired Conditions

1. Habitat conditions are stable or improving over time as indicated by the status of focal species and other elements of the 2016 Monitoring Strategy. Habitats of species specifically listed in the Proclamation as objects of interest in the Monument are managed to preserve and protect these species.
2. Maintain and improve habitat for fish, wildlife, and plants, including those with the following designations: game species, harvest species, focal species, and watch list species.
3. All fish and wildlife species and plant communities in need of special protections are covered by well thought out management plans implemented by either the Forest Service or other responsible entities. These management plans should apply best management practices and use best available scientific information.
4. The list of Management Indicator Species (MIS) monitored within the monument represents the diversity of habitats and species identified as objects of interest, including all threatened, endangered, candidate and species of special concern, both federal- and state- listed, as well as rare plant communities.
5. Biological and watershed resources are managed in a balanced and mutually beneficial fashion.
6. Plan elements include a robust adaptive management strategy to proactively address and combat potential climate change impacts to biological resources and watersheds.

**Comment [MN6]:** We didn't understand why the desired condition from WL-2 - Management of Species of Concern was exactly restated here, since we did not think WL-2 was being rescinded and no other desired conditions from the existing Forest Plan were restated.

### Objectives [Goals]

1. [Review the list of objects of interest, determine which fish and wildlife species or plant communities may require additional protection and update the MIS list as needed to accurately monitor them within \[2\] years.](#)
2. [Prepare additional management plans as needed for at-risk species and plant communities within \[10\] years.](#)
3. [Complete a robust climate change assessment and incorporate any needed adaptive management elements into the Monument Plan within \[5\] years.](#)

#### Management Approaches

1. [Develop an active and adaptive management strategy that emphasizes habitat restoration and conservation programs to improve the health of the watershed and the forest to better support biological resources.](#)
2. [Review the list of biological resources considered objects of interest and determine whether additional actions are needed to preserve and protect any listed species or plant communities. Prepare management plans targeted at these resources as needed, for example Nelson's bighorn sheep.](#)
3. [Compare the current MIS list against the objects of interest to ensure that it adequately reflects and is able to accurately monitor the condition of all habitats and species considered objects of interest.](#)
4. [Monitor at-risk species according to the 2012 Planning Rule direction on monitoring.](#)
5. [Conduct a robust climate change assessment that addresses potential changes to and interactions between biological and watershed resources, develop adaptive management plan elements to address potential impacts, and adopt them as a plan amendment.](#)

#### Energy Resources

##### [Objectives \[Goals\]](#)

1. [Promulgate regulations within \[3\] years that allow citations to be issued for unauthorized mining activities.](#)

##### Standards

1. Valid Federal mineral rights existing within the Monument at the time of the Monument proclamation must be managed to protect the objects of interest listed in the Proclamation.

#### Designated Areas

##### Desired Conditions

1. [Designated wilderness within the Monument is maintained as a naturally-evolving and natural-appearing landscape that provides for primitive and unconfined recreation use. The sense of remoteness and solitude is maintained.](#)

#### Suitability of Lands

1. Mineral and energy resources exploration and development is not suitable within the Monument, except where valid rights already exist at the time of the Monument proclamation. Table 1 below would replace Table 2.1.3 of Part 2 of the Angeles Forest Plan to identify the current Suitability of Lands within the Monument. [Activities within permitted sediment placement sites are not considered mineral and energy resources exploration and development.](#)
2. Within the Monument, the Pacific Crest National Scenic Trail foreground is not suitable for special-use authorizations for new communication sites and wind genera

**Table 1. Suitable uses commodity and commercial uses, San Gabriel Mountains National Monument**

Activity or Use	Land Use Zone						
	Developed Areas Interface	Back Country	Back Country Motorized Use Restricted	Back Country Non-Motorized	Critical Biological	Wilderness	Experimental Forest
<b>(Non-Rec) Special Uses: Low Intensity Land Use</b>	Suitable	Suitable	Suitable	By Exception	By Exception	By Exception	For Research
<b>Communication Sites</b>	Designated Areas	Designated Areas	Designated Areas	By Exception	By Exception	Not Suitable	By Exception
<b>Livestock Grazing</b>	Designated Areas	Designated Areas	Designated Areas	Designated Areas	Not Suitable	Designated Areas	Not Suitable
<b>Major Transportation Corridors</b>	Designated Areas	Designated Areas	Not Suitable	Not Suitable	Not Suitable	Not Suitable	Not Suitable
<b>Major Utility Corridors</b>	Designated Areas	Designated Areas	Designated Areas	Not Suitable	Not Suitable	Not Suitable	Not Suitable
<a href="#"><u>Water Conservation, Flood Control and Related Activities</u></a>		<a href="#"><u>Forest Service to Complete</u></a>					
<b>Road Construction or Re-construction</b>	Suitable	Suitable	Suitable for authorized use	Not Suitable	Not Suitable	Not Suitable	By Exception
<b>Developed Facilities</b>	Suitable	Suitable	By Exception	Not Suitable	Not Suitable	Not Suitable	For Research
<b>Oil and Gas Exploration and Development Areas<sup>1</sup></b>	Not Suitable	Not Suitable	Not Suitable	Not Suitable	Not Suitable	Not Suitable	Not Suitable
<b>Minerals Resources Exploration and Development<sup>1</sup></b>	Not Suitable	Not Suitable	Not Suitable	Not Suitable	Not Suitable	Not Suitable	Not Suitable
<b>Renewable Energy Resources</b>	Suitable	Suitable	By Exception	By Exception	Not Suitable	Not Suitable	Not Suitable
<b>Wood Products, Including Fuelwood Harvesting</b>	Suitable	Suitable	Suitable	Suitable	By Exception	Not Suitable	By Exception
<b>Special Forest Products</b>	Suitable	Suitable	Suitable	Suitable	By Exception	By Exception	Not Suitable

generally compatible with the land use zone but may be appropriate under certain circumstances.

<sup>1</sup> -With the exception of valid existing rights

\*By Exception = Conditions which are not

The following Land Use Zone descriptions would replace the descriptions on pages 9 through 11 of Part 2 of the Angeles Forest Plan and describe the zones within the Monument.

**Critical Biological (3,043 acres or less than 1 percent of the national forest):** This zone includes the most important areas on the national forest to manage for the protection of species at-risk. Facilities are minimal to discourage human use or designed specifically to direct that use towards sustainable practices. Levels of human use will vary dependent on the area's carrying capacity. ~~The level of human use and infrastructure is low to moderate.~~

Wildland/Urban Interface Threat Zones (see Appendix K in Part 3 of the forest plan) may occur in this zone. Community protection vegetation treatments within the Critical Biological land use zone may occur by exception. In these cases, managers will consider species and habitat needs.

The management intent is to retain the natural character and habitat characteristics in this zone and limit the level of human development ~~to~~ actively manage it to allow for protection of species-at-risk. Activities and modification to existing infrastructure and new infrastructure are allowed if they are beneficial or neutral to the species for which the zone was primarily designated (see Table 34: San Gabriel Mountains National Monument Critical Biological Land Use Zones). Human uses are more restricted in this zone than in Back Country Non-Motorized zones in order to protect species needs, but are not excluded. Low to moderate impact uses, such as hiking, mountain biking and hunting are generally allowed. Motorized use of existing National Forest System roads is allowed. Less than 1 percent of the National Forest System and non-system roads are found in this zone including one mile of inventoried unauthorized road. Road density will not be increased and may be decreased as a result of species protection requirements.

**Comment [MN7]:** Deleted this sentence since this is not possible in some areas such as the East Fork and North Fork, for example.

**Table 2. San Gabriel Mountains National Monument critical biological land use zones**

<b>Primary Species Protected and Primary Uses</b>			
<b>CBLUZ</b>	<b>Primary Species Protected</b>	<b>Place</b>	<b>Primary Uses**</b>
South Fork Big Rock Creek	Mountain yellow-legged frog	Angeles High Country	Existing use of Sycamore Flats, South Fork and Little Jimmy Campgrounds is retained
South Fork Little Rock Creek	Mountain yellow-legged frog	Angeles High Country	Existing use of the Williamson Rock climbing area is retained
Lower Little Rock Creek	Arroyo toad	Mojave Front Country	Ongoing activities at Little Rock Reservoir and associated developed areas to include the boat ramp, Fisherman's Point, Juniper, Rock Point and Sage Picnic Areas are retained. Use of Little Rock Road (NFS Road 5N04) is retained. Little Rock OHV Area is closed above Rock Point Day Use Area; however a small segment is retained. Little Rock OHV route adjacent to CBLUZ is retained for opportunities to define an improved system while relocating established routes outside of sensitive areas. Joshua Tree and Basin Campgrounds and Santiago OHV route are currently closed due to potential impacts to the arroyo toad. Site specific analysis of these areas will determine if they are a suitable use within the CBLUZ.
West Fork San Gabriel River	Santa Ana sucker	San Gabriel Canyon	CBLUZ location is Cogswell Dam downstream to the beginning of the wild trout area (2nd bridge). This area is currently managed as a wild trout stream and this designation is retained. Management of the Cogswell Dam for flood control and water conservation including water release is not in conflict with the CBLUZ designation and is retained. Installation of toilets can be considered neutral or beneficial use. Administrative use and use of National Forest System Road 2N25 as a hiking and bicycle path will be retained.
East Fork San Gabriel River	Santa Ana sucker	San Gabriel Canyon	CBLUZ location is from just above the Oaks day use site upstream to the private land parcel near the Bridge to Nowhere, including the Cattle Canyon tributary upstream to the upper extent of the Santa Ana designated critical habitat. Existing transportation and other uses will continue.
North Fork San Gabriel River	Santa Ana sucker	San Gabriel Canyon/Angeles Uplands East	CBLUZ location is from the West Fork/North Fork confluence upstream to the northern extent of the Santa Ana sucker Designated Critical Habitat, including the Bichota Canyon tributary of the North Fork San Gabriel River. Existing uses will continue.
Aliso Canyon	California red-legged frog	Soledad Front Country	The West Wide Energy Corridors will be managed for utility infrastructure, including new and upgraded transmission lines. Access to utility corridors will be maintained while minimizing road infrastructure within the CBLUZ. Existing Transportation and other uses will continue.

<b>Primary Species Protected and Primary Uses</b>			
<b>CBLUZ</b>	<b>Primary Species Protected</b>	<b>Place</b>	<b>Primary Uses**</b>
Upper Big Tujunga	Arroyo toad, California red- legged frog	Angeles Uplands (West)	Access on County Road 3N19 and associated maintenance, access to private property in section 35, existing Special Use Permits, and proposed OHV corridor across Alder Creek area are retained. Dispersed recreation use will continue to be limited by limiting parking areas.
Soledad Canyon	Arroyo toad, unarmored three-spine stickleback	Soledad Front Country	The Wildlife Viewing site at this location will be retained. Soledad Campground will continue to be closed and facilities removed. Private lands surrounding the CBLUZ are not affected.

\*\*This is a partial list of activities associated with these CBLUZ's. See Suitable Use Tables (Part 2 of Forest Plan) for full description of all able uses.

**Existing Wilderness** (122,098 acres or 34 percent of the Monument): This zone includes congressionally designated wildernesses. Only uses consistent with all applicable wilderness legislation and with the primitive character are allowed in existing and recommended wilderness. Road access is limited to uses identified in the specific legislation designating the wilderness (see wilderness in the forest-specific design criteria of Part 2 of the Forest Plan), approximately .7 percent of the National Forest System and non-system roads are found in this zone including 1.4 miles of inventoried unauthorized road. The characteristic Recreation Opportunity Spectrum objective is Primitive with limited areas of Semi-Primitive Non-Motorized.

Wildland/Urban Interface Threat Zones (see Appendix K in Part 3 of the forest plan) may occur in this zone. Community Protection vegetation treatments within the existing wilderness zone may occur by exception. In these cases, managers will consider wilderness needs. The management intent is to administer this zone for the use and enjoyment of people while preserving its wilderness character and natural conditions. Non-conforming uses will be removed to preserve wilderness character. Designated wilderness includes:

- Sheep Mountain Wilderness
- San Gabriel Wilderness
- Magic Mountain Wilderness
- Pleasant View Ridge Wilderness

### **Designated Areas**

The following changes to the Forest Plan “Special Designation Overlays” are proposed for the Monument. These changes would update the Special Designations to acknowledge and be consistent with designation of two new wilderness areas in 2009.

**Figure 2. Proposed land use zone map**

**Figure 3. San Gabriel Mountains National Monument land use zones**

**Table 3. New wilderness area descriptions**

Title	Place	Acres
Magic Mountain Wilderness	Soledad Front Country	11,938
<p>The United States Congress designated the Magic Mountain Wilderness in 2009. The Magic Mountain Wilderness is generally bounded by: Santa Clara Divide Road (3N17.7) on the south; Backcountry Discovery Trail 1 (3N37) on the east; and forest boundaries on the north and west. A closed road traverses the mountain from the community of Lange to Magic Mountain. This corridor separates the Magic Mountain Wilderness into two portions. The Magic Mountain Wilderness's chaparral-covered hillsides and oak-studded canyons provide a scenic vista and suitable habitat for the California condor. The area also offers primitive recreational opportunities for the rapidly urbanizing Santa Clarita Valley. There are no officially designated trails within this wilderness. However, several social trails exist which were created by visitor use.</p>		
Pleasant View Ridge Wilderness	Angeles High Country, Mojave Front Country	27,040
<p>The United States Congress designated the Pleasant View Ridge Wilderness in 2009. This wilderness area is located roughly 30 miles northeast of La Canada, north of the Angeles Crest Highway where the San Gabriel Mountains slope north to meet the Mojave Desert. The area features 8,200-foot Mt. Williamson and other dramatic peaks, formidable cliffs, the headwaters of Little Rock Creek, remote backcountry, and some of the most magnificent canyon country in the San Gabriel Mountains. The Pleasant View Ridge Wilderness is generally bounded by: California Highway 2 (Angeles Crest Scenic Byway) on the south; Little Rock Canyon on the west; and the forest boundary on the north; and High Desert National Recreation Trail (10W02 Burckhardt) on the northeast. The area can be accessed from California State Highway 2 at Vincent's Gap, Islip Trailhead, Buckhorn Campground, and Three Points Trailhead and from the Pacific Crest National Scenic Trail and High Desert National Recreation Trail. Trails going through this wilderness include: High Desert National Recreation Trail (10W02 Burckhardt), Islip Saddle (9W02), and Pacific Crest National Scenic Trail.</p>		

**[Monitoring Plan](#)**

[\[Forest Service to insert Monument-specific Monitoring Plan here\]](#)

## Chapter 3 – San Gabriel Mountains National Monument Transportation Plan

The Proclamation (Obama 2015) states:

The Secretary shall prepare a transportation plan that specifies and implements such actions necessary to protect the objects identified in this proclamation, including road closures and travel restrictions. For the purpose of protecting the objects identified above, except for emergency or authorized administrative purposes, the Secretary shall limit all motor vehicle use to designated roads, trails, and, in the Secretary's discretion, those authorized off-highway vehicular use areas existing as of the date of this proclamation.

Current management of the Monument complies with the Proclamation direction to limit motorized vehicles to designated roads, trails, and areas. Motor vehicle use maps (MVUMs) were published in 2011 and reflect this management of the transportation system in the Monument (MVUMs covering the Monument are included in the Map Packet for this Monument Plan).

Because the San Gabriel Mountains National Monument Plan is a programmatic level decision and does not directly authorize any project level site specific actions, the transportation plan also does not make any site specific changes to the transportation system. Instead it provides a framework by which to manage the transportation system and make future decisions concerning changes to it that support the management intent of the Monument Plan. Changes to the existing transportation system will only be made after

appropriate site-specific environmental analysis. Transportation projects within or which enter or traverse the Monument will be configured in a manner that protects and is consistent with the proper care and management of the objects identified in the Proclamation.

### **Desired Conditions**

1. All transportation projects within or that traverse the Monument are configured in a manner that protects, and is consistent with the proper care and management of, the objects of interest.
2. Road and trail maintenance and use is managed to prevent adverse effects to values or attributes that make heritage resources eligible for the National Register of Historic Places.
3. The Monument is accessible through alternative transportation and public transportation options in coordination with other agencies and gateway communities to provide greater access for those who do not have personal vehicles, reduce vehicle congestion, address parking capacity issues, and improve public safety.
4. Road density within the Monument remains stable or is decreasing. The number of automobiles ~~is~~are reducing over time.
5. Roads and trails are maintained to standard.
6. Sufficient access points and parking areas are provided to serve visitors to the Monument during peak seasons in a manner that does not adversely impact the gateway communities and neighborhoods that surround the Monument.
7. Roads and trails not authorized in the Master Trails Plan or by Special Use Permit are removed, the land is restored, and new unauthorized roads and trails are quickly removed and prevented from recurring. Impacts to riparian zones, watersheds, protected objects, and sensitive species in the Monument are minimized.
8. Transportation connectivity to and within the Monument is improved through coordination with state, county, local, and regional government entities, municipalities, Tribal governments, other agencies, and the public.
9. The road and trail system is sufficient to provide a good balance of recreation opportunities for all users, including hikers, hunters, bicyclists, equestrians, OHV enthusiasts, and motorists, consistent with sustainable recreation practices.
10. The road and trail system includes easy-to-interpret multilingual wayfinding signage that includes international symbols. Up-to-date maps are available in multiple languages and in different media formats that clearly identify roads and trails, recreation opportunities, objects of interest, parking, and alternative transportation options.

### **Objectives [Goals]**

1. Complete a review of the existing transportation network to determine if there are conflicts with objects of interest within [two] years.
2. Complete a detailed Master Transportation Plan within [three] years.
3. Complete the alternative transportation and public transportation opportunities analysis listed in Management Approach 7 within [two] years.
4. Complete the assessment of parking capacity at access points and alternative public transportation options identified in Management Approach 8 within [three] years.
5. Complete the traffic study listed in Management Approach 12 within [two] years.
6. Complete the road and trail wayfinding signage program listed in Management Approach 16 within [three] years.
7. Complete updated maps and implement an advanced traveler information system within [two] years.

8. Remove unauthorized roads and trails and restore the land within [ten] years.

9. Develop “dark sky” guidelines for lighting within [two] years.

### **Standards**

1. Transportation projects either within, or which enter or traverse, the Monument will be configured in a manner that precludes adverse impacts to the objects of interest.

2. Parking areas, transportation nodes and access points which serve visitors to the Monument shall be designed and conditioned to avoid adverse impacts on surrounding gateway communities and neighborhoods.

3. Street and highway lights must comply with “dark sky” guidelines when installed or replaced.

### **Guidelines**

1. All new road and trail crossings of the Pacific Crest National Scenic Trail within the Monument will be evaluated and planned to minimize impacts to the scenic, natural, and experiential values of the trail. New roads and new trails, including motorized and mechanized transport trails, within the PCT foreground should be designed to minimize the visual, aural and resource impacts to the PCT. Exemptions may be allowed if required by law to provide access to private lands or documented as the only prudent and feasible alternative.

2. Parking capacity will be evaluated during the planning of any new trail heads, including how parking may affect gateway communities when trails are located in their vicinity.

### **Management Approaches**

1. Review the existing transportation network against the location of the objects of interest to determine if there are any conflicts. Take corrective action as needed.

~~1.2.~~ Improve needed operational maintenance level 2 National Forest System roads to standard so they qualify for Federal Lands Transportation Program funding (operational maintenance level 3+) and other related federal funding.

~~2.3.~~ Improve non-motorized trails to standard so they qualify for Federal Lands Transportation Program funds (“provide an engineered surface”) and other related federal funding.

~~3.4.~~ Decommission and rehabilitate high-risk, low-value roads identified in the roads analysis and travel analysis processes.

~~4.5.~~ Over the planning period, the number of inventoried unauthorized roads and trails are reduced, and the development and proliferation of new unauthorized facilities is minimized.

~~5.6.~~ Coordinate projects with California State Parks and the Off-Highway Motor Vehicle Recreation Program, including projects that restore areas ~~withof~~ unauthorized off-highway vehicle uses.

7. Develop a detailed Master Transportation Plan to guide future transportation projects within the Monument and linkages to external road and trail transportation networks.

8. Evaluate alternative transportation and public transportation opportunities, including identifying programs that facilitate access from underserved communities, ways to link to public transportation options in gateway communities, and sites appropriate for bus turnarounds at key recreation areas.

~~9. Work~~ Collaborate with gateway communities and local partners to manage potential impacts and maximize potential benefits associated with Monument designation by addressing issues such as identification of appropriate access points ~~and~~, parking capacity at access points, ~~and alternative public transportation access options.~~

~~6.10.~~ Ensure there is adequate, safe parking for equestrian horse trailers.

- ~~7.11.~~ Coordinate with local government on transportation planning. Participate in the Southern California Association of Governments. Coordinate with Caltrans to improve transportation connectivity within the Monument, while minimizing adverse resource effects.
- ~~8.12.~~ Coordinate with programs such as CAR-LESS CA and connections such as El Pueblo ~~and~~ Metro Gold Line, Metrolink, and other regional, municipal, and local public or private transit systems.
- ~~9.13.~~ Coordinate with the Federal Lands Collaborative Long-Range Transportation Planning effort to ensure it is responsive to the transit/transportation needs of the Monument.
14. Prepare a traffic study for the Monument area, including access points through local communities, to determine traffic flow during various times of the year and traffic safety/speeding “hot spots.”
15. Maintain awareness that “driving for pleasure” is and will continue to be an important use within the Monument. Enhance messaging that “driving for pleasure” does not include racing.
- ~~10.16.~~ Implement a uniform speed limit on major roads throughout the Monument, similar to National Parks. Evaluate the installation of new technology that automatically senses and issues speeding tickets.
- ~~11.17.~~ Update the Angeles National Forest’s motor vehicle use map periodically as necessary to identify currently designated roads, trails and areas for public motor vehicle use.
18. Manage high visitor use and traffic congestion using the following strategies:
- Consider using temporary one-way traffic flows and closures during peak volume periods, while utilizing adequate signage, guidance, and traffic controls consistent with established standards.
  - Evaluate the use of parking capacity limits.
  - Enforce parking capacity limits and locations established by the appropriate governing authority.
  - Prevent or limit parking in riparian areas to reduce resource damage.
  - Explore opportunities to increase or better distribute parking capacity in key areas, including providing access by shuttles or other forms of public transportation. Parking locations should be clearly identified and delineated.
19. Develop “dark sky” guidelines for lighting.
20. Develop a road and trail wayfinding signage program suitable for multilingual and international visitors. Update maps to clearly identify roads, recreation opportunities, objects of interest, parking, and alternative transportation options. Utilize advanced travel information systems and the Monument website to advise visitors of road closures, changes to travel circulation, and parking availability.

## Current Transportation System

### Road System

The road system in the Monument consists of approximately 496 miles of existing roads, ranging from single-lane dirt roads to paved-double lane roads. These are under various jurisdictions, including the Forest Service, Caltrans, and counties. Of these, there are over 276 miles open to motor vehicle use.

Driving for pleasure is a popular activity on scenic routes through the Monument. Highway 39 and Highway 2, the Angeles Crest Scenic Highway are major routes providing access into and through the Monument.

There are two designated open OHV areas within the Monument: the San Gabriel Canyon OHV area includes 150 acres of rocky, sandy, reservoir land; and the Little Rock OHV area includes the Little Rock OHV trail. Outside of the two open OHV areas, all vehicles are limited to designated roads.

The network of National Forest System roads within the Monument that are currently designated for motorized use, including OHV areas, are shown on the back side of the MVUM for the Angeles National Forest (see the map packet). This map is published as required by the Forest Service Travel Management Regulations.

### Non-motorized Trail System

The non-motorized trail system within the Monument currently consists of approximately 243 miles of system trails; that provide hiking, hunting, horseback riding and mountain biking opportunities. National trails including about 87 miles of the Pacific Crest Trail, the Silver Moccasin National Recreation Trail, the Gabrielino National Recreation Trail and the High Desert Trail.

All trails except the Pacific Crest Trails and trails within wilderness areas are open to mountain bikes. The West Fork National Scenic Bikeway parallels more than eight miles of the West Fork San Gabriel River. This gated, paved road provides a relatively flat, paved route for bicyclists of all abilities.

[Insert description of the equestrian trail system here]

The network of National Forest System trails and areas on NFS lands within the Monument that are currently designated for non-motorized use are shown on the back side of the MVUM for the Angeles National Forest (see the map packet). This map is published as required by the Forest Service Travel Management Regulations.

### Road Maintenance

Roads have long been recognized as the primary human-caused source of soil and water disturbances in forested environments. Generally, higher densities of roads within a watershed result in quicker run-off to the stream network and increase the risk of channel erosion and downstream sedimentation.

Most of the National Forest System roads in the Monument are rated high or very high for erosion hazard. New roads must be constructed with strict standards and guidelines, especially those that could influence riparian conservation areas or watershed values, are located in landslide-prone areas, or could cause soil erosion. Proper maintenance and care of existing roads are critical to minimize effects due to erosion. Proper decommissioning of roads is necessary to achieve positive long-term effects through removal of chronic sources of erosion, sedimentation, and hydrologic modification.

**Comment [MN8]:** It is unclear what this paragraph is intending to say differently than the nearly identical paragraph above.

Similarly, most trails are located on soils with either high or very high erosion hazard ratings. Trail maintenance and care are necessary to keep the integrity of the trails at a level to be used by the public in an uninterrupted manner.

The proliferation of unauthorized roads and trails is an ongoing problem and results in unacceptable effects to soils and other resources. Many have been created by recreation use from communities immediately adjacent to the Monument or off-road vehicle travel. These trails contribute to lost soil productivity and increased soil erosion and compaction, both long- and short-term. It is important to remove these trails, restore the land in an expeditious fashion and prevent them from recurring.

Public roads within the Monument are either maintained by the Forest Service, or by local government agencies or the State under a special use permit. Special use roads are generally maintained by the user under a special use permit.

## **Transportation System Management**

### **Maintenance Strategy**

Currently available funding is insufficient to fully maintain the existing road system. The following strategies will be used to prioritize needed maintenance and to improve the ability to complete all needed maintenance for roads managed by the Forest Service:

1. Public safety and natural resource protection would be the highest priorities for maintenance.
2. Maintenance levels 3 through 5 roads would be higher priority for maintenance than maintenance levels 1 and 2 roads, due to the higher potential loss of investment, generally higher traffic volumes and speeds, and resulting safety risks and liabilities.
3. Submit appropriate projects for maintenance, reconstruction, or rehabilitation funding when opportunities are available (agency funding, state grants, partnerships, and other sources).
4. Seek additional sources of funding to reduce the maintenance backlog and keep the road system in acceptable condition. Potential sources include Federal Highway Trust Fund funding through the national transportation bill and appropriated funding specifically for specially designated areas such as monuments.
5. Partner with user groups, permittees, and other entities to accomplish needed road maintenance.
6. Consider creating an “Adopt-a-highway” program.
7. Consider entrance fees or toll roads to generate revenue for maintenance.
8. Consider reducing the assigned maintenance level of individual roads based on access needs, resource risks, and costs to improve the ability to maintain the entire road system.
9. Consider closing roads not currently needed for resource management activities or significant recreation access to reduce maintenance costs, while retaining the road prism for expected future access needs.
10. Consider restricting vehicle access for certain roads to emergency use only. These roads would still be open to pedestrian, bicycle and equestrian use, but would be maintained at a minimum level of service to reduce maintenance costs.
11. Consider opportunities to reduce the size of the road system by decommissioning individual roads or converting them to non-motorized trails.
12. Include all affected parties in any decision to close or decommission roads or trails, to ensure the road system continues to meet user needs.

## Forest Transportation System Changes

Changes to the forest transportation system may include actions such as changes of assigned maintenance levels for individual roads, construction of new roads, removal of roads from the system through decommissioning, and conversion of roads to trails. New roads will generally be limited, though could be constructed to meet management goals to provide access to new recreation facilities or opportunities; to provide access to the objects of interest; to provide access to administrative sites (ranger stations, work centers, etc.); to replace roads producing unacceptable resource effects; or to provide access for scientific research.

The priority for road retention emphasizes retaining road access for public use and for management activities similar to current access levels. For public access, emphasis should be on maintaining roads to recreation sites, concentrated use areas used for dispersed recreation, sites authorized by special use permits, and private land. The road system will also be available for recreation driving and for off-highway vehicle use on roads designated for such use. For management access, emphasis should be on ecosystem restoration and fire protection.

Roads with high risks for causing unacceptable effects to natural resources should be repaired, relocated, closed, or decommissioned to reduce effects. Road decommissioning should focus on roads producing unacceptable effects where repair or relocation are unreasonable, roads where the potential for resource effects and high maintenance costs outweigh the need for access for resource management or recreation, and any unauthorized motorized routes remaining after the system was last designated in 2011.

Changes to the transportation system will generally be identified through the existing roads analysis process and any future travel analysis processes, and subsequently decisions would be made through site-specific project analysis (NEPA). The objective of travel analysis (previously called roads analysis) is to provide decision-makers with critical information to develop and manage transportation systems that are safe and responsive to public needs and desires, are affordable and efficiently managed, have minimal negative ecological effects on the land, and are in balance with available funding for needed management actions. Travel analysis is required to inform decisions related to identification of the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands; and to inform decisions related to the designation of roads for motor vehicle use.

A roads analysis was completed in 2005, and addressed all NFS roads within the eventual Monument. This RAP is still a valid tool to help inform decisions about the road system (USDA Forest Service 2005c).

In the completed RAP, evaluation criteria were created based on specific topic areas described in the FS-643 miscellaneous report (agency direction at the time). These topics included ecosystem functions and processes; aquatic, riparian zones, and water quality; terrestrial wildlife; economics; minerals and range management, water production, and special forest products; special use permits; general public transportation; administrative uses; protection; road-related and unroaded recreation; passive use values; social issues; and civil rights and environmental justice. Similar criteria would be appropriate to evaluate the need for future changes in the trail system.

The evaluation criteria developed for the Monument RAP were:

- Watershed risk factors

- ◆ Watershed Condition Class
  - Slope Stability Hazard
  - Earthquake Hazard Rating
- Species risk factors
  - ◆ Riparian Species
    - Stream Crossings
    - Habitat for Threatened, Endangered or Sensitive Species outside of Riparian Areas
    - Riparian Conservation Areas
- Administrative Benefits
  - ◆ Community protection, fire suppression, prevention, and prescribed fire
  - ◆ Vegetation management, resource evaluation and management
  - ◆ Special use access and administration
  - ◆ Law enforcement
  - ◆ Mining, oil and gas, grazing
  - ◆ Any other roaded access needed to manage the forest
- Public Benefits
  - ◆ Access to developed recreation sites and campgrounds
  - ◆ Driving for pleasure
  - ◆ Access to recreational special uses (including Recreational Residences)
  - ◆ Access to local surrounding communities

The risks and the benefits of each road were compared, resulting in two categories of roads flagged for further study. The first group of roads identified contains those that may require mitigation. “High Priority for Mitigation” roads are those roads (or segments) that were found to have both higher risk scores and a high level of public or administrative importance. The following criteria were used in their identification:

1. Watershed Risk Score is greater than or equal to 4; OR Species Risk Score is greater than or equal [to 4](#).
2. Public Importance Score is greater than or equal to 3; OR Administrative Importance Score is greater than or equal [to 3](#).
3. Combined Rap Score is greater than or equal [to 5](#) (highest possible is —10)

The second group of roads requiring further study is those with “High Risk and Low Importance”. Roads that fall into this group pose significant risk to either species or watersheds and are of low importance to the public, forest personnel, and special use permittees. The following criteria were used to identify these roads or segments:

1. Watershed Risk Score is greater than or equal [to 4](#); OR Species Risk Score is greater than or equal [to 4](#)
2. Public Importance Score is less than or equal to 2, AND Administrative Importance Score is less than or equal [to 2](#).
3. Combined Rap Score is greater than or equal [to 5](#) (highest possible is —10).

When changes are proposed to the forest transportation system to further the purposes of the Monument, the decisions made will be informed by this roads analysis and possibly additional travel analysis, along with site-specific project analysis (NEPA). Evaluation criteria for the travel analysis will include criteria similar to the criteria described for the RAP, as well as other criteria appropriate to the specific proposed action.

The complete RAP can be found in the project file at the Supervisor's Office of the Angeles National Forest.