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SGR Confluence with Cattle Canyon Improvements Project Comments

November 29, 2016

This letter transmits the comments of Pasadena Casting Club (PCC) on the San Gabriel River Confluence with Cattle Canyon Improvements Project (herein referred to as the Project) Notice of Intent and Proposed Action published on October 17, 2016. The Pasadena Casting Club, founded in 1947, is a 300-member family oriented fly fishing organization, with a long history of supporting conservation of our local wild trout streams, most notably the East Fork San Gabriel River. Thank you for the opportunity to comment on the scoping document for the Project. We appreciate the ambition and scope of the Project, meant to address the longstanding problems that have severely impacted the heavily visited section of the East Fork.

The Notice of Intent states "The future desired condition is to provide balanced, **environmentally sustainable** (emphasis added) recreation opportunities to meet the needs of a growing urban and culturally diverse population." The Project's primary challenge is to achieve a balance between contradictory purpose and need statements of protecting and restoring a sensitive riparian environment while enhancing and enlarging the recreation opportunities for a growing population of visitors. It is our view that the Project, as described by the proposed action items, does not sufficiently address: (1) the "environmentally sustainable" component of the Projects purpose, and (2) the purpose and need statement to "improve riparian habitat conditions in certain areas and make progress toward enhancing stream habitat conditions by restoring vegetation, minimizing invasive plants and noxious weed presence, and developing management strategies to regulate access." There are no Proposed Action Items that describe actions outside of recreational improvement.

The following sections identify our primary concerns with the Proposed Action Items addressing "environmental sustainability" (or lack thereof), and suggest that Action Items be created to address such issues.

Water Quality Monitoring and Standards

There is insufficient detail about water quality monitoring, such as metrics, standards, responsible parties, and adaptive management. A water quality monitoring plan should be implemented that addresses project components such as (1) six new river access points (i.e., areas of concentrated use), (2) 270 new parking spaces (i.e., overland sheet flow issues and turbidity), (3) pedestrian bridge (i.e., stream bank alteration), and (4) nine restroom facilities (overland sheet flow associated with concrete footprint). There should be some assurances provided that current water quality condition would at least be maintained, but improvement should be a goal.

Illegal Mining and Resulting Stream Damage

No mention is made of the significant damage to the stream bed, bank and riparian vegetation, including old mature streamside trees, caused by illegal mining on this section of the East Fork San Gabriel River. The project should include a hydrology study to assess this damage and make recommendations for protective measures and restoration opportunity. The project should include proactive planning components for mining prevention. Prohibition of overnight parking, with the potential exception of

time-limited permitted parking for hikers, should be considered as part of the ANF effort to stop illegal mining. This would also appeal to the recreation component of the Project, as many visitors do not feel safe recreating near mining activities.

Stream Access Points

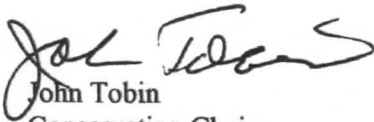
The scoping document indicates six controlled stream access points. This is an improvement from earlier plans for a dozen such points, and is clearly intended to reduce the impact of uncontrolled access. However, it is our continued belief that encouraging visitors to engage in in-stream activities is detrimental to the health of the stream and riparian ecosystem.

Wild and Scenic River Management

The scoping document states "The formal designation of the EFSGR is not part of the project; however, if designated, river uses would comply with those listed in the Forest Service Handbook 1909.12, Chapter 8.2." This statement fails to recognize that streams found eligible for WSR designation are required to be managed as WSR while designation is pending, and should be modified as such. We would like to see how FSH 1902.12 Chapter 8.2 and associated forest management plan standards were addressed during the Project planning phase. The scoping document should incorporate Proposed Action Items relevant to WSR management standards.



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