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August 11, 2015

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

RE: San Gabriel Mountains National Monument “Need to Change” Analysis

Dear Mr. Seastrand,

On behalf of the **Concerned Off-Road Bicyclists Association (CORBA)**, our sister IMBA Chapter the **Mount Wilson Bicycling Association (MWBA)**, and our members and constituents, we are pleased to provide the U.S. Forest Service comments on the San Gabriel Mountains National Monument (Monument) “Need to Change” Analysis.

About CORBA

CORBA is a 501(c)(3) nonprofit dedicated to preserving open space, creating great trail experiences for all trail users including mountain bikers, and to educate cyclists and the public on cycling-related issues. CORBA was founded in 1987 and represents the greater mountain biking community of Los Angeles and Eastern Ventura Counties. We are an original founder of, and now one of hundreds of local chapters of the International Mountain Bicycling Association.

We are passionate about mountain biking, public trails and preserving our public open space for future generations. CORBA is committed to ensuring equal access for all trail users, and to contributing to everyone's enjoyment of the trails. CORBA organizes and coordinates activities that support mountain biking recreation and that promote the conservation, administration and the maintenance of the public lands.

CORBA and MWBA have been directly and collaboratively involved in the maintenance of trails in the Angeles National Forest, contributing thousands of volunteer hours to trail maintenance, restoration, and educational efforts. We have also restored many trails damaged by the Station Fire, and continue to maintain them. We have leveraged our position to apply for cycling

industry grants to cover professional trail restoration work. There still remains much work to be done, and we are proud to partner with the Angeles National Forest to continue in this role. Our volunteer trail crews also include certified B-Level sawyers, helping keep trails cleared of the increasing amount of Station Fire deadfall that obstructs our trails.

We are also a member of the San Gabriel Mountains National Monument Community Collaborative, convened by the National Forest Foundation, and have actively participated in both the formation of the Collaborative, and the development of the Collaborative’s consensus comments on the Need to Change document. We are in full support of the Collaborative’s consensus comments, in addition to those provided herein.

General Comments

In our review of the San Gabriel Mountains National Monument “Need to Change” Analysis we find ourselves in agreement with many of the findings, in need of further clarification of some of the findings, and believe there to be some notable opportunities for improvement to the existing plan. We also have several specific examples of project-level issues that need to be accommodated in the management plan to streamline their future correction and implementation to achieve the goals of the Proclamation.

The comments included herein are made with the acknowledgement and understanding that the Monument Management Plan, in accordance with the directives of the Proclamation and the guidance and background presented in the Proclamation’s preamble, will not adversely impact the existing and future water resources and supplies, flood control, utility, and telecommunications facilities within the Monument.

We believe that in its management of the Monument, the USFS must consider activities that occur both inside and outside the boundaries of the Monument, to the extent that such activities impact the Monument, the National Forest, and/or surrounding communities. This is especially true of the required transportation plan which we address below.

We also believe that the USFS must do a better job of partnering with surrounding communities, interest groups, nonprofits, conservancies, and volunteer groups to protect and enhance existing uses and to eliminate or mitigate potential adverse impacts. We applaud the appointment of a new Partnership Coordinator, and a new Volunteer Coordinator in the recent hiring round for the Angeles National Forest. These are important positions to fill to achieve that goal. We also believe that the Trails Manager/Coordinator position is of vital importance to achieving the goals of both the Proclamation, the completion of a Monument transportation plan, and the implementation of the current management plan. This position has been vacant for five years, with the result being a seeming lack of coordination of trail restoration and maintenance

efforts forest-wide. We urge the Forest Service to give higher priority to filling the Trails Manager position within the Forest and Monument administrative staff.

Given that the Proclamation states “The Secretary shall provide for maximum public involvement for the development of that plan...”, we agree with Regional Forester Randy Moore’s decision to use the 2012 Planning Rule, with its increased emphasis on public participation, as the most appropriate process by which this plan amendment will be conducted. We also believe that “maximum public involvement” requires sufficiently long public comment periods. We appreciate the extension of the current comment period to 60 days, and urge a minimum of 60 day comment periods for all future public comment periods within this process. For us, and many other organizations and entities based around a monthly meeting schedule, 60 days is the minimum amount of time needed to effectively draft, edit and ultimately approve our public comments on a monthly meeting schedule.

Further, we agree that the Monument should fall under the management authority of the Angeles National Forest, even though approximately 4,000 acres are within the neighboring San Bernardino National Forest.

We also believe that, since such a large proportion of the existing Forest plan, and its adaptive management components are already in alignment with the goals and directives of the Proclamation, that an amendment to the current plan is appropriate. We understand that this amendment will not delay the expected time frame in which an entirely new management plan will be developed (expected in the early 2020’s). We also support the decision to prepare an Environmental Assessment (EA) as the appropriate environmental document, given that this will be an amendment to the existing Forest Plan.

Forest Goals and Desired Conditions

The “Need to Change” document lists the primary goals from Part 1 of the current plan. Goal 3.1 is listed in Table 1 as Managed Recreation in a Natural Setting, but is incorrectly referred to in a subsequent paragraph as goal 3.2. Regardless of this error, we believe the existing framework provided in goal 3.1 to be consistent with the Monument Proclamation as stated. That does not mean, however, that there is not room for improvement of that framework for the benefit of the entire Forest and Monument. We do not interpret the Proclamation as prohibiting the construction of new trails and recreational facilities, the improvement, realignment, or replacement of existing trails when needed to enhance access to the resource, provide improved recreational opportunities and/or to better protect those resources. As noted, authorities already exist to close trails or roads, or take other administrative actions as needed to protect the resources.

Part 1, Goal 4.1: Energy and Minerals Production.

The Proclamation specifically withdraws lands within the Monument from Federal mining laws. The “need to change” document paraphrases the Proclamation, stating “with the exception of valid existing rights, and the Materials Act of 1947...” However, in Section 1 of the Materials Act of 1947 there is a single sentence which reads “Nothing in this act shall be construed to apply to National Parks or National Monuments...” We are perplexed by this seeming contradiction in the language of the Proclamation and the language of the Materials Act referred to in the Proclamation and the Need to Change document. The Forest Service will need to consider that language as it applies to vegetative materials vs. mineral materials and to the National Monument. We agree that Part 1, Goal 4.1, Energy and Minerals Production, of the current plan needs to change to bring it into compliance with the directives of the Proclamation.

Recreation Management

The “Need for Change” document does not recommend a change to Recreation Management. However, we believe that Recreation Management does need to change insofar as the required transportation plan will include and impact recreational trails, covered below.

Also stated in the Proclamation: “Warning is hereby given to all unauthorized persons not to appropriate, injure, destroy, or remove any feature of the Monument...” This must also be considered with regards to mining and mineral laws and the materials act, as they relate to recreational activities such as gold panning, rockhounding, etc.

Transportation Plan

As a trail advocacy group, we are also encouraged by the Proclamation’s direction to prepare a transportation plan. We see this plan as an opportunity to enhance and improve recreational opportunities, while preserving and protecting the Monument’s significant natural, cultural and historic resources, and improving the public’s ability to access, learn about, and enjoy those resources. We urge the Forest Service to strive for a balance within the transportation plan that achieves all of these stated goals of improving recreation, access, interpretation and protection.

Trails are the means by which a large proportion of Forest and Monument visitors recreate, experience and enjoy these resources, while enhancing both their quality of life, their mental and physical well-being, and their appreciation of and sense of stewardship for the resources protected by this Monument designation and the larger National Forest system. To be maximally effective, a transportation plan must be comprehensive, including (whether currently closed or open to the public) vehicular roads and highways, OHV routes and areas, administrative and utility access roads, motorized and non-motorized trails, wilderness and non-wilderness trails, non-system trails and roads, along with their overall condition, maintenance needs. as well as

supporting infrastructure and amenities such as trailhead parking, gates, information kiosks, wayfinding signage and general information distribution.

There are also an unacceptably large number of deficiencies within the current Forest and Monument transportation system. One example is the many miles of fire roads that remain closed due to the Forest Service’s inability to maintain them or restore them since the Station Fire.

The existing Recreation Opportunity Spectrum (ROS), for example, does not sufficiently capture such aspects as the levels of difficulty and/or fitness needed to enjoy the existing trails and roads, or plan for new ones, and may need to be revisited to meet the community’s diverse recreation needs.

There is a broad range of skill and fitness levels among cyclists, and other trail users. Within the current trail and transportation system, there are very few opportunities for easy or “beginner” level trails, or for long-distance backcountry singletrack trails for bicycles. For example, there are few, if any, singletrack trail options to cross the San Gabriel Mountains by bicycle in a north-south direction, nor traverse the range in an east-west direction. The existing trails that provide this long-distance connectivity are the PCT (closed to bikes), or within designated Wilderness areas (also closed to bikes). These types of long-distance backcountry experiences are sought out and highly treasured by a segment of the bicycling community, while others in our community seek different experiences ranging from technical challenge to comfortable, easy, wide fire roads. When considering recreational trail opportunities for all user groups and especially cyclists, it will be important to consider the diversity of needs, abilities and experiences sought within each user group.

Readily accessible online information about the National Forest and Monument’s trails is also grossly lacking. The existing Forest Service web site does not adequately provide easily accessible, consistent, and accurate information about trails and roads, their condition, risk, and level of technical or physical difficulty.

A local example of where this is being accomplished is the Los Angeles County Trails web site at <http://trails.lacounty.gov>. One solution to this deficiency might be to partner with Los Angeles County to incorporate National Forest and Monument trail information into the County’s comprehensive trails web site. Other non-county trail networks have already been successfully incorporated into the L.A. County trails website, with the result being a consistent and up-to-date information resource that covers much more than county-managed trails. Where trails cross jurisdictions this one-stop resource could be leveraged to coordinate both trail planning efforts by neighboring land managers, as well as for the public to plan activities that incorporate trails which cross jurisdictions. Other trail information web sites exist and may provide opportunity for

similar partnerships. MTBProject.com, for example, provides verified, locally-sourced trail information for mountain bikers.

This information needs to be available in the many diverse languages in common use in communities surrounding the Forest, in addition to English.

Furthermore, the Monument deserves, and we believe the Proclamation mandates, improved public access to interpretive opportunities within the Monument. We see this as including access to information, and therefore urge the Forest Service to develop a comprehensive, easily accessible, multi-lingual web site.

The current Angeles National Forest web site, with its complicated, non-human readable URL's, and difficult navigation, does not do an adequate job of disseminating information about the Forest or the Monument. Information provided by a plethora of unofficial online sources is also wildly inconsistent and incomplete. We also see a Monument web site (and an improved Angeles National Forest web site) as able to play a vital role in Design Criteria, Part 3, Appendix D, 1. Conservation Education.

The Proclamation places special emphasis on improved public access to and enjoyment of the objects for which the Monument was established. One of those named objects is the Mount Wilson Observatory. The most direct non-motorized route to access Mount Wilson and the Monument from the urban areas of Pasadena/Altadena and the San Gabriel Valley is the Mount Wilson Toll Road. Currently public access to the Mount Wilson Toll Road is through a City of Pasadena installed gate, including razorwire-capped chainlink fencing, which is under the control of a private citizen. It is known locally known as the “Pinecrest Gate.” This restriction of public access to (and at times, exit from) our National Forest and National Monument is in direct contradiction to the Proclamation's goals of improving public access. It also has a greater impact on cyclists, who are prohibited from entering the adjacent Eaton Canyon Nature Reserve, and can therefore easily become trapped behind the gate, or denied access to the Forest, with the gate being opened on an irregular schedule. We believe this access, and the many trails that connect to the Monument and Forest from adjoining jurisdictions, must be considered in a transportation plan. We also urge the Forest Service to work with Los Angeles County and the City of Pasadena to find resolution to the ongoing Pinecrest Gate issue.

Another long-standing issue is that of the closed Highway 39. We urge the Forest Service to work with Caltrans and Los Angeles County to reach a final resolution to this problematic, but from our perspective, important access to the Monument and its recreational resources.

Further, National Recreation Trails including the Silver Moccasin trail and Gabrielino trail provide access to the Monument, and their maintenance and condition should be given a higher priority as access points to the Monument. Currently, a portion of the Gabrielino trail remains

closed to the public since the Station Fire, and is in need of a significant re-route to reduce future maintenance needs, improve its sustainability and reduce impacts to the Arroyo Seco riparian zone.

Also within the transportation plan there needs to be a clearly stated and communicated policy on E-bikes, including pedal-activated electric motor-assist, and full-electric bicycles. While some Federal and State agencies include them under the general classification of bicycles, confusion exists as to their legality for use on non-motorized trails. While we are not taking a stance either way on this complex issue, we believe it is up to the Forest Service to clearly state their policy and associated regulatory authority governing that policy.

Land Use Zones

We concur with the Forest Service assessment of the need to change the current Land Use Zones to be consistent with the addition of the the new Magic Mountain and Pleasant View Ridge wilderness areas, as well as the 2014 Forest Plan Amendments in which Inventoried Roadless Areas were assessed as a result of a lawsuit.

We also believe that the determination of the boundaries of the Monument, which were done without any public involvement or transparency, did not adequately capture all of the significant cultural, historic and natural resources of the Angeles National Forest that should have been eligible for National Monument designation. Though it may be beyond the scope of this planning process, we believe that the failure to include many significant resources from the Monument was an oversight that must be corrected. We also urge the Forest administration to give, in general, equal administrative attention to the areas outside the Monument as it gives those within the Monument. As separate designations within a connected landscape, they must be considered and managed as a whole.

Program Strategies and Tactics

The second paragraph of the Program Strategies and Tactics of the “Need to Change” analysis notes that “Forest Plan direction is not necessary to increase and enhance partnership opportunities.” While this may be true, we believe that an increase in partnerships will be important to achieve the goals of the Proclamation. We encourage the Forest Service to consider the positive impacts that increased volunteer patrols, such as the Angeles Mountain Bike Patrol, and increased law enforcement presence could have on both protecting the resources and enhancing public stewardship. We also see these patrols as able to play a vital role in Design Criteria, Part 3, Appendix D, 1. Conservation Education, and 3. Presence.

Conclusion

Components of the “Need to Change” analysis that we have not specifically addressed in these comments, we are in general agreement with.

We were initially taken aback by the suddenness and lack of transparency in the development of the Proclamation, but have appreciated the opportunity to provide comment on the “need to change” document, both on behalf of CORBA and MWBA, our members and constituents, and as a participating member of the Community Collaborative group.

We look forward to the release of a draft EA and draft management plan, and to continuing and deepening our ties to and partnership with the Forest Service for the benefit of our beloved Angeles National Forest and San Gabriel Mountains National Monument.

Sincerely,

Steve Messer
President,
Concerned Off-Road Bicyclists Association

Jenny Johnson,
President
Mount Wilson Bicycling Association