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October 31, 2016

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

RE: San Gabriel Mountains National Monument Draft Management Plan and EA comments

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) draft Management Plan and Environmental 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 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 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 A- and B-Level sawyers, helping keep trails cleared of the increasing amount of Station Fire deadfall that obstructs our trails.

We are also participating members of the San Gabriel Mountains National Monument Community Collaborative (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 Management Plan "need to change analysis" last year, and the Collaborative's current Draft EA and Management Plan comments. We are in full support of the Collaborative's consensus comments, in addition to the comments provided herein.

We appreciate the extension of the current comment period to November 1st, 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.

General Comments

In our review of the San Gabriel Mountains National Monument draft Management Plan we believe there are some notable opportunities for improvement of the draft plan.

While we understand that only those things determined as needing to change through the Need to Change analysis are included in the draft plan, constantly referring to the rest of the current management plan, the proclamation, and other associated documents made it much more difficult to see how those changed components fit within the broader plan. We would have preferred to see the Monument plan as a separate, complete document with changes noted, rather than a piecemeal collection of only the items that have changed. Because of this incomplete nature of the draft management plan, some of the Collaborative's comments, and some of ours, may already be addressed to some extent within the current Forest Management Plan, but our comments lack references to those existing sections.

We share the Collaborative's vision of a unique and special National Monument, with a focus on visitor experience and recreational needs commensurate with the vast population served by the Monument. The Vision statement and Universal Objectives, Standards, Guidelines and Management Approaches included in the Collaborative comments provide a broad summary of and overview of Monument management, which we feel is lacking in the draft Management Plan. We support the inclusion of this Vision statement section, or something similar, to provide an aspirational overview of the Monument's potential.

Sustainable Recreation

As acknowledged in the proclamation, the ANF and SGMNM serve a population base of more than fifteen million people, providing 70 percent of the Greater Los Angeles area's open space, and 30 percent of our drinking water. This Forest has not had sufficient resources to maintain its recreational amenities to a standard capable of sustainably serving the recreation needs of its population base. The result is a number of heavily impacted areas such as the San Gabriel canyon and resource degradation due to overuse, while in more remote areas, trails and recreational amenities have gone neglected, degraded to the point where only intrepid outdoor adventurers are able to experience and enjoy them.

One possible tool, suggested by the Collaborative and echoed here, is the creation of a Visitor Experience, Information and Education master plan that meets the needs of a diverse, multicultural, multilingual community. It is apparent that today, more than ever before, many Monument and Forest visitors are being lured into the outdoors by social media posts, without any exposure to leave no trace principles, trail etiquette best practices or responsible recreation guidelines. These forest visitors often don't know how to behave in the woods. Social media has the power to reveal little-known special places to a broad audience, without the context of what is so special about these places, or how to enjoy and experience them responsibly. It can also attract visitors in numbers far exceeding site capacities when social media posts go "viral."

Over the past decade, we've seen explosive growth in graffiti, trash, and the degradation of and damage to trails in many areas of the Monument and Forest. A Visitor Experience, Information and Education master plan could help provide a more appropriate context of what makes a place special, and how to ensure it remains special.

A master Recreation Plan could be used to determine specific amenity and site visitor capacities, and ascertain what improvements are needed to help bring carrying capacities up to levels in line with use, or to reduce use to a more sustainable capacity by providing more dispersed recreation opportunities. These are two dichotomous approaches; do we concentrate use and impacts over a smaller area, or disperse use with lighter impacts over a larger area? We are not qualified to make that determination, but feel a master Recreation Plan will be needed to guide such decisions.

With the growth in graffiti, we feel there is a need for a regulation prohibiting the possession of spray paint cans by unauthorized persons, so that those carrying spray paint cans can be cited, whether or not they are caught in the act of tagging or graffiti vandalism. There can be no valid reason for the possession of spray paint in the National Forest or Monument by members of the public.

Under Sustainable Recreation, Desired Conditions 1, we feel it is also important to acknowledge and include the diverse range of visitor skill and fitness levels and desired experiences. Nobody wants every trail to be like a sidewalk, nor do they want every trail to require high levels of fitness or risk tolerance. Recreational amenities need to meet a broad spectrum of desired experiences, fitness and skill levels.

Sustainable Recreation Guidelines, 1, states that “Existing recreation events may be allowed to continue at current levels.” This guideline potentially impacts the Angeles Crest 100 endurance foot race. The AC100 is unique in that participants are required to contribute at least one day of trail maintenance. This is a valuable contribution to the entire trails community. In recent years, the event has been burdened with the Williamson Rock closure, and subsequently being denied use of their historic course along the PCT through what is now the Pleasant View Ridge Wilderness. The term “current levels” in this context could be troublesome, since their “current” use of the PCT has been limited. We hope this event can eventually return to its original course using the PCT through the Pleasant View Ridge wilderness, as efforts are underway to seek a legislative solution to return the event to its historic course. While not a mountain biking event, the mountain biking community recognizes the valuable contributions to trail maintenance made by AC100 participants, and we have provided logistical support to the event in recent years.

We are troubled by Sustainable Recreation Guidelines 2, in which the PCT is given exceptional consideration that would create additional hurdles for the construction of new trails. Nothing related to the PCT was identified in the Need to Change analysis, so we are perplexed by the inclusion of a change in management of the PCT. Since the PCT and designated Wilderness prohibit bicycle use, bicyclists have no north-south or east-west long-distance trails available to them within the Monument. While we understand the desire to preserve the PCT experience, as an urban forest, PCT users can expect to see evidence of civilization, even from within Wilderness areas. We would hope that to “minimize visual, aural and resource impacts” does not preclude the construction of new trails, or the re-routing of existing trails as needed to meet management goals and recreation needs.

Sustainable Recreation Management Approaches 2 includes a number of approaches that could be addressed by a Master Recreation Plan, but no such plan is called for. We would like to see a Master Recreation plan developed, covering the three bullet points under Management Approaches 2, the Collaborative’s comments’ additional desired conditions, and moves the Monument towards the desired conditions.

Heritage Resources

Standards 1 concerns the management of “road and trail maintenance and use to prevent adverse effects to values or attributes that make heritage resources eligible for the National Register of Historic Places.” Authorities already exist to close roads or trails if they are impacting heritage or biological resources, but we’d like to see a management approach where closures are a “last resort,” and alternatives including re-routing of the trail or road, or bringing the road or trail up to a more sustainable standard are given priority over overt closures.

Transportation Plan

We believe that the Trails Manager/Coordinator position is of vital importance to achieving the goals of both the Proclamation, the completion of a Trail Master Plan, and a Monument Transportation Plan. This position has been vacant for six years, with the result being a seeming lack of coordination of trail restoration and maintenance efforts forest-wide. We continue to urge the Forest Service to fill the Trails Manager position within the Forest and Monument administrative staff.

Under Desired Conditions, point 1 describes accessibility to the Monument via alternative and public transportation. We are especially encouraged by this, and having taken advantage of the pilot Chantry Flat shuttle, we see immense benefits to connecting the Gold Line to destinations within the Forest and Monument. The pilot shuttle service offered a convenient way to access the Forest without the need for a vehicle. With a future extension of the Gold Line, even more such connections will be possible.

One consideration that must be made with regards to any shuttle service is whether to accommodate bicycles. We would like to see any shuttle service that serves the San Gabriel canyon include accommodations for bicycles. The West Fork National Scenic Bikeway is the most accessible bicycle route in the Monument. It is paved, relatively flat, and an easy route for beginner cyclists, families and children. Families without a motor vehicle may want to experience this National Scenic Bikeway, and public transportation may be their only option to get there.

Conversely, there are few, if any, beginner-friendly routes for bicycles along the Angeles Crest. If shuttle service or public transport was provided to the Angeles Crest, we don’t see a need to accommodate bicycles. There are already permitted commercial outfitters available to shuttle mountain bikers, and public transportation should be prioritized for those who need and depend on it.

Under **Current Transportation System**, Road System, it is stated that there are “over 276 miles open to motor vehicle use.” This is not technically correct. While there may be 276 miles

designated for motor vehicle use, it has been a long time since all of those 276 miles have been open and available for use by motor vehicles.

Similarly, the MVUM mentioned in paragraph two correctly describes roads as currently designated for motor vehicle use. This highlights an ongoing problem with road and trail closures; that of providing readily accessible and current information about what is closed and what is open. A dedicated Monument web site, as described in the Collaborative comments and our previous “need to change” comments, could help provide near real-time closure information.

Under Trail System, it is stated that “the trail system within the Monument currently consists of approximately 243 miles of system trails, including 87 miles of the Pacific Crest Trail.” We’d like to see a breakdown of those 243 miles of system trails to show trail mileage designated for multi-use including bicycles. Since 87 miles of the PCT are included, and four Wilderness areas are within the monument, the actual trail mileage open to bicycles is unknown, but substantially less than the total number cited.

Readily accessible online information about the Forest and Monument trail network is also lacking. The existing Forest Service web site does not provide easily accessible, consistent, and accurate information about trails and roads, their designation, condition, risk, and level of technical or physical difficulty. The current web site is only available in English, while a large proportion of Forest and Monument visitors are not native English speakers. We appreciate the inclusion of multilingual information and outreach in Sustainable Recreation, Management Approach 5, but feel this must be extended to online information.

We have previously cited the Los Angeles County Trails web site (<http://trails.lacounty.gov>) as an example, and as a possible opportunity to partner with the County to provide current trail information. The Angeles National Forest web site, with its complicated, non-human readable URLs 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.

Another long-standing issue is that of the closed Highway 39. The 2005 RAP identifies Highway 39 as a necessary evacuation route, and states that the Forest Service is coordinating the reopening of highway 39 with Caltrans. We understand that Caltrans is just now, 11 years later, re-evaluating the feasibility of opening Highway 39 through to the Angeles Crest. We urge the Forest Service to continue 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. While the current RAP was most recently updated in 2005, much has changed since then due to the Station Fire, ongoing drought, and increased use and visitation.

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 the California Vehicle Code classifies e-bikes into three classes and permits their use where bicycles are permitted, but confusion exists as to their legality for use on federal 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.

Conclusion

Components of the draft Management Plan analysis that we have not specifically addressed in these comments, we are in general agreement with.

We appreciate the opportunity to provide comments on the draft Management Plan, both on behalf of CORBA and MWBA, our members and constituents, and as a participating member of the Community Collaborative.

We look forward to the release of the final 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