

The Honorable Ryan Zinke
Secretary of the Interior
Department of the Interior
1849 C Street, N.W.
Washington D.C. 20240

May 25, 2017

Subject: The San Gabriel Mountains National Monument meets or exceeds Antiquities Act requirements and considerations established by Executive Order (EO 13792).

Dear Mr. Secretary;

The San Gabriel Mountains Community Collaborative (“Collaborative”) is a broad-based group of individuals representing local governments, tribal interests, state agencies, environmental and recreational organizations, community groups, businesses, land trusts, forest leaseholders and a wide spectrum of other forest users. Our purpose is to advocate for the resources, management objectives, and implementation strategies that will sustainably benefit the San Gabriel Mountains National Monument (“SGMNM”) as well as the Angeles National Forest and all communities throughout the region.

In keeping with this charge, the San Gabriel Mountains Community Collaborative engaged in a thorough process to investigate the Antiquities Act requirements and considerations established by Executive Order. Following this extensive review process, the conclusion of the Collaborative is that the San Gabriel Mountains National Monument meets or exceeds Antiquities Act requirements and Executive Order considerations.

The SGMCC would like to extend an invitation to President Trump and Secretary Zinke to visit the San Gabriel Mountains National Monument and interact with the Collaborative and Angeles National Forest Supervisor Jeffrey Vail to experience how groups with widely diverse viewpoints are able to work together cooperatively to provide informed recommendations regarding our Federal lands.

Prior to the establishment of the SGMNM, there were extensive public outreach and coordination efforts among State agencies, local officials, tribal representatives and other relevant stakeholders. The Collaborative was formed immediately following Monument designation from interested parties that had both supported and opposed the designation, as well as interested organizations that did not participate in the prior discussions. Since that time, Collaborative members have been working cooperatively with each other and with the U.S. Forest Service to discuss our differing viewpoints and reach consensus on the future management of the Monument.

The Collaborative is confident that both the San Gabriel Mountains as well as the surrounding communities have benefitted from the Monument's designation. Consequently, the Collaborative seeks to provide the Secretary of the Interior ("Secretary") with sufficient factual evidence to support a finding that the SGMNM meets or exceeds and other considerations for Monument designation under the Antiquities Act ("Act") as outlined in the President's Executive Order.

The following evidence, organized in the order of the criteria listed in the Executive Order, supports such a finding:

- i. **There is no doubt that the SGMNM meets criteria set forth by the Act that the land reservation not exceed "the smallest area compatible with the proper care and management of the objects to be protected"**. The SGMNM includes more than 400 protected archeological sites, some of which date back more than 8,000 years. The location of these archeological resources informed the decision on the extent of the SGMNM's boundaries. The northern boundary encompasses the incomparable Aliso-Arrastre area at the Santa Clara River headwaters. The western border extends to the Placerita Canyon area, the historic site of the first documented discovery of gold in California. The southern border encompasses the Mount Wilson Observatory where the speed of light was first measured accurately. The eastern border encompasses the historic Eldoradoville mining town that provided general stores, saloons, and dance halls to support more than 500 miners following the California Gold Rush.
- ii. **It is an indisputable fact that the resources protected by the SGMNM reservation of land are appropriately classified under the Act as "historic landmarks, historic and prehistoric structures, [or] other objects of historic or scientific interest"**. All of the archeological, historical, sacred places, and biological resources protected by the SGMNM warrant classification as "objects of historic or scientific interest" within every meaning that is contemplated for this term under the Act. Scientific resources abound in the form of unparalleled biological diversity of the Forest and Monument due to the unique geology (east-west) of the range of the San Gabriel Mountains. These mountains are the most biologically diverse in the Continental US. The historic and cultural resources protected by the SGMNM represent successive layers of history, including that of Native Americans, Spanish missionaries and colonialists, Mexican rancheros, and Euro-American settlers, farmers and prospectors. The San Gabriel Mountains themselves are sacred to the Kizh Tribe, and are embedded in the Tribe's Creation Stories.
- iii. **The Monument designation on the San Gabriel Mountains is both harmonious with, and furthers the purpose of, the "multiple use" objectives underlying the Federal Land Policy and Management Act (FLPMA)**. The Monument designation on the San

Gabriel Mountains does not thwart or impede the “multiple uses” policy embedded in the FLPMA. To the contrary, the Monument designation protects existing water rights and preserves all existing uses (including mineral extraction, water infrastructure, pipeline, telecommunication and electrical transmission uses) and *even permits the expansion of such uses as well as new facilities to support such uses*. The only condition imposed is that such development be “consistent with the proper care and management of the objects protected” by the Monument designation.

- iv. **Collaborative members report that the Monument designation on the San Gabriel Mountains has actually enhanced the use and enjoyment of adjacent non-federal lands, and is expected to result in increased recreation opportunities and improved water quality within the protected watersheds.** Non-Federal lands within and beyond the SGMNM consist of urban cities, rural unincorporated communities, utility/water resource developments, foothill trails, and individual residences. These landholders are represented directly by sitting members of the Collaborative, all of whom have first-hand knowledge regarding whether landholder interests have been adversely affected in any way by the Monument designation.
- v. **The Collaborative has heard no evidence which suggests that the Monument designation has adversely impacted the economic development or fiscal condition of affected States, tribes, and localities.** State agencies, tribal interests, and local governments that have a considerable stake in the lands within and around the SGMNM are all represented by members of the Collaborative where the collective economic, cultural and resource concerns of these entities are represented. No member entities of the Collaborative have reported that the economic or fiscal interests of a State, tribal, or local government stakeholder have been impaired or truncated as a result of the San Gabriel Mountains’ Monument designation.
- vi. **The Monument status conferred on the San Gabriel Mountains has not resulted in a drain on federal resources. To the contrary, the Monument designation has resulted in an influx of large corporate and private donations to supplement the finite federal resources devoted to the SGMNM.** For instance, Coca-Cola recently donated more than \$900,000 to expand clean-up efforts and secure water quality protections within the SGMNM as a direct result of its Monument designation. Because the SGMNM lies adjacent to an urban core of more than 15 million people, it is certain that a steady stream of fiscal support to supplement federal resources and ensure proper management of historic landmarks, historic and prehistoric structures, and objects of historic and scientific interest within the SGMNM will remain available.

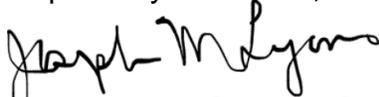
- vii. **The Collaborative offers these additional factors which pertain to the Monument designation of the San Gabriel Mountains:** 1) The Monument designation secures and enhances the protection of all watersheds within the SGMNM; this factor is crucial, given that the San Gabriel Mountains provide a significant amount of drinking water supplied to the 15 million plus residents of the greater Los Angeles area; 2) Existing mineral extraction interests within the SGMNM are not affected by the Monument designation, and in fact continue at full operation; 3) The San Gabriel Mountains serve the surrounding population by providing a wide variety of recreational uses, including fishing, hunting, hiking, mountain biking, off-road vehicle use, skiing, snowshoeing, camping, rock climbing, kayaking, and swimming. Many local communities do not have adequate parks and the Monument designation is helping to secure public transportation to this precious resource from our many low income and diverse communities.

Based on the above discussion, the Collaborative respectfully requests that the Secretary accord significant weight to the factual information provided herein, and thereupon find that:

1. The San Gabriel Mountains National Monument embodies all of the elements of the Antiquities Act and considerations of the Executive Order (EO 13792);
2. It is an appropriate use of Federal lands; and
3. It clearly benefits many surrounding land uses and communities.

In closing, the San Gabriel Mountains Community Collaborative would like to extend an invitation to President Trump and Secretary Zinke to visit the San Gabriel Mountains National Monument and interact with the Collaborative and Angeles National Forest Supervisor Jeffrey Vail to experience how groups with widely diverse viewpoints are able to work cooperatively together to provide informed recommendations regarding our Federal lands.

Respectfully submitted;



Joseph Lyons, Steering Committee Chair, on behalf of the San Gabriel Mountains Community Collaborative

cc: Governor Brown

It is the determination of the Collaborative that this project or program is consistent with the mission and vision of the Collaborative and is therefore worthy of Collaborative support; however, this support is made on behalf of the Collaborative and does not imply endorsement by individual agencies and organizations represented on the Collaborative.

The San Gabriel Mountains Community Collaborative Consists of Members from:

Association of Rural Town Councils (Antelope Valley) and Acton Town Council

Amigos de los Rios

Antelope Valley Unit, Backcountry Horseman of California

Archaeology/Culture

Arroyo Seco Foundation

Asian Pacific Policy & Planning Council (A3PCON)

CalFire

California Department of Transportation, District 7

California Rifle and Pistol Association

City Project

Community Hiking Club

Community Partners, Trust for Public Land

Concerned Off-Road Bicyclists Association (CORBA)

Consejo de Federaciones Mexicanas en Norteamérica (COFEM)

El Monte City School District, El Monte Promise Foundation

Fisheries Resource Volunteer Corps (FRVC)

Friends of the Angeles National Forest

Gabrieleno Band of Mission Indians - Kizh Nation

Gateway Council of Governments

Gateway Water Management Authority

Glendora

LA County Board of Supervisors – 1st District (Solis)

LA County Board of Supervisors – 5th District (Barger)

Los Angeles Business Council

Los Angeles County Department of Public Works

Mount Wilson Bicycling Association

Mountain High

Mt Baldy Ski Lifts

National Forest Homeowners

Natural History Museum of Los Angeles County

Pasadena Casting Club

Rivers & Mountains Conservancy

San Bernardino County Board of Supervisors (Rutherford)

San Gabriel Mountains Forever

San Gabriel Mountains Regional Conservancy

San Gabriel Valley Conservation Corps

San Gabriel Valley Council of Governments

San Gabriel Valley Legislative Coalition of Chambers

San Gabriel Valley Water Association

Southern California Edison

The Sierra Club

The Wilderness Society