



San Gabriel Watershed and Mountains Special Resource Study & Environmental Assessment

Summary of Public Comments and Response
October 2012



Public Comment Summary and Response to Comments
Draft San Gabriel Watershed and Mountains
Special Resource Study
and Environmental Assessment

October 2012

Contents

I. Overview of Public Involvement	4
Public Meetings	4
Publicity / Press	4
Public Comments.....	5
List of Agencies and Organizations Commenting.....	5
II. Summary of Comments Received.....	8
Acronyms.....	8
Study Process.....	8
Resource Description.....	9
Natural Resources.....	9
Cultural Resources	9
Recreational Resources.....	9
Significance	10
Suitability.....	10
Feasibility.....	10
Need for NPS Management.....	11
Alternatives	11
Overall Summary.....	11
Actions Common to All Alternatives.....	11
Continuation of Current Management (No Action Alternative).....	12
Alternative A: San Gabriel Mountains National Recreation Area.....	13
Alternative C: San Gabriel Watershed National Recreation Area.....	14
Alternative D: San Gabriel Region National Recreation Area	14
Environmental Assessment	19
Level of Analysis.....	19
Recreation Use and Visitor Experience.....	19
Socioeconomics and Environmental Justice	20
Land Use, Regulatory Authorities, and Jurisdiction	20
Impacts on Biological and Water Resources.....	22
Comments on Other Topics.....	22

Government Cost and Funding	22
Roles and Partnerships	23
Natural Resource Protection.....	23
Recreation Management	25
III. Response to Substantive Comments on the Draft San Gabriel Watershed and Mountains Special Resource Study / Environmental Assessment	28
Resource Description.....	28
Significance.....	31
Suitability.....	32
Need for NPS Management.....	33
Study Process.....	33
Alternatives	33
Concerns Relating to the Range of Alternatives	33
Alternative A Concerns	38
Alternative D Concerns	38
Other Designations Suggested in the Public Comments	45
Environmental Assessment	46
Effects on Recreation Use and Visitor Experience	47
Effects on Water Resources.....	48
Effects on Biological Resources.....	49
Socioeconomic Effects	50
Effects on Regulatory Agencies, Local Jurisdictions, Land Use, and Private Property.....	51

I. Overview of Public Involvement

The National Park Service (NPS) released the *San Gabriel Watershed and Mountains Draft Special Resource Study and Environmental Assessment* (draft study report/EA) in October 2011. A 120-day public comment period closed on February 13, 2012, after two extensions. The original comment period from October 17 to December 16 was extended to January 9 due to a mailing delay, and was extended again in response to requests for more time. The NPS received approximately 12,000 comment letters about the draft study report/EA from many individuals, diverse groups, and several letter writing campaigns. The study team also held five public meetings in October and November 2011 at locations throughout the study area in El Monte, Palmdale, Pomona, Santa Clarita, and Tujunga. At each meeting, the study team gave a presentation describing the findings of the study and the alternatives. A question and answer session followed, after which the participants were asked to split into small groups where they could talk with a member of the study team, view posters showing the alternatives, and make comments which were recorded on flip charts. The meetings were facilitated by the study team, San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC) staff, and additional NPS staff. The meetings were attended by approximately 400 participants.

Public Meetings

Participation in the public meetings to discuss the draft study report/EA was as follows:

Location	Date and Time	Participants
El Monte	October 29, 2011, 1:00 p.m.	146
Palmdale	November 14, 2011, 7:00 p.m.	40
Pomona	November 15, 2011, 7:00 p.m.	95
Santa Clarita	November 16, 2011, 7:00 p.m.	68
Tujunga	November 17, 2011, 7:00 p.m.	57
TOTAL		406

Publicity / Press

A press release announcing completion of the draft study report/EA and a series of public meetings was sent to approximately 50 media contacts in southern California on October 17, 2011. From that time until the extended public comment period closed on February 13, 2012, media coverage about the draft study report/EA was primarily by the San Gabriel Valley Tribune, which wrote numerous articles. There were also posts about the draft study in a variety of internet blogs associated with recreation, the

environment, politics, communities, or business. Several other newspapers, a community radio station, a community television station, and a government policy journal also ran stories about the draft study report/EA.

Public Comments

The NPS received over 12,000 comments from individuals, agencies, elected officials, and organizations. Approximately 95% of the 12,000 comment letters received were submitted as a result of several organized campaigns. Most comments were submitted via written letters and e-mail. There were approximately 715 unique comment letters and over 11,000 form letters of 5 different types, several of which had multiple variations. Campaigns organized by the Wilderness Society, Sierra Club, the San Gabriel Mountains Forever Campaign, and Friends of the River accounted for the majority of the campaign comments submitted. The comments also include notes from the small group discussions held at each public meeting. Over one hundred comments were submitted in Spanish and translated for the record.

The NPS received comments from over 50 agencies, local governments, private businesses and organizations. Comments were also received from 25 elected officials, including a congressional delegation letter submitted by 23 members of Congress.

List of Agencies and Organizations Commenting

Organizations (28)

- Amigos de los Rios
- Asian Pacific Policy and Planning Council
- Californians for Western Wilderness
- California Trail Users Coalition
- California Wilderness Coalition
- The City Project
- Consejo de Federaciones Mexicanas (COFEM)
- Concerned Off-Road Bicyclists Association (CORBA)
- The Conservation Alliance
- Friends of Coyote Hills
- Friends of the River
- Friends of the Whittier Narrows Natural Area
- Hills for Everyone
- National Forest Homeowners
- National Parks Conservation Association
- Pasadena Audubon Society
- Project Amiga
- Santa Clara River Watershed Conservancy
- San Gabriel Mountains Forever
- Santa Monica Trails Council
- Santa Susana Mountain Park Association

- Sierra Club, Angeles Chapter, San Gabriel Valley Task Force
- Sierra Club, Puente-Chino Hills Task Force
- Sierra Club, Southern California Forests Committee
- Sierra Madre Mountain Conservancy
- The Trust for Public Land
- The Wild Rivers Project
- The Wilderness Society

Professional Societies (1)

- Southern California Society of American Foresters (San Gabriel Chapter)

Local Governments and Community Associations (8)

- City of Claremont
- City of Diamond Bar
- City of Duarte
- City of Industry
- City of Monterey Park
- Crescenta Valley Community Association
- Hacienda Heights Improvement Association
- Juniper Hills Town Council

County Government (4)

- County of Los Angeles, Fire Department
- County of Los Angeles, Department of Parks and Recreation
- County of Los Angeles, Department of Public Works
- County of Los Angeles, County Sanitation Districts

Water Districts (3)

- The Metropolitan Water District of Southern California
- Pasadena Water and Power
- San Gabriel Valley Water Association

Regional and State Agencies (7)

- California Department of Fish and Game
- California Department of Parks and Recreation
- Puente Hills Habitat Preservation Authority
- San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC)
- Santa Monica Mountains Conservancy
- San Gabriel Valley Mosquito and Vector Control District
- Wildlife Corridor Conservation Authority

Elected Officials (25)

- California State Assemblymen, Tim Donnelly
- California State Senator, Bob Huff
- United States Representative, Karen Bass
- United States Representative, Xavier Becerra

- United States Representative, Howard Berman
- United States Representative, Lois Capps
- United States Representative, Judy Chu
- United States Representative, Sam Farr
- United States Representative, Bob Filner
- United States Representative, Janice Hahn
- United States Representative, Mike Honda
- United States Representative, Barbara Lee
- United States Representative, Zoe Lofgren
- United States Representative, Jerry McNerey
- United States Representative, Grace Napolitano
- United States Representative, Lucille Roybal-Allard
- United States Representative, Laura Richardson
- United States Representative, Linda Sanchez
- United States Representative, Adam Schiff
- United States Representative, Brad Sherman
- United States Representative, Pete Stark
- United States Representative, Maxine Walters
- United States Representative, Henry Waxman
- United States Representative, Lynn Woolsey
- United States Senator, Barbara Boxer

Federal Agencies (3)

- National Aeronautics and Space Administration
- U.S. Army Corps of Engineers
- U.S. Forest Service – Angeles National Forest

Businesses (5)

- Aera Energy
- California Ski Industry Association
- Mountain High Resort
- Mt. Baldy Ski Lifts, Inc.
- National Ski Areas Association

Tribes (1)

- Soboba Band of Luiseno Indians

II. Summary of Comments Received

The comments on the *Draft San Gabriel Watershed and Mountains Special Resource Study and Environmental Assessment* (draft study report/EA) covered a broad range of topics. The majority of the comments were either directly related to the study alternatives or to the primary topics of recreation management and resource protection which the alternatives were designed to address. The comments were entered into the National Park Service (NPS) Planning Environment and Public Comment database and analyzed. The following summary represents the full range of comments the NPS received. NPS responses to substantive comments are provided in the final section of this document, “Response to Substantive Comments on the *Draft San Gabriel Watershed and Mountains Special Resource Study/Environmental Assessment*.”

Acronyms

The following acronyms are commonly used throughout the comment summary:

ANF – Angeles National Forest
CA – California
BLM – Bureau of Land Management
EA– Environmental Assessment
LA – Los Angeles
NPS – National Park Service
NRA – National Recreation Area
OHV – Off-highway vehicles
RMC – Lower Los Angeles and San Gabriel Rivers and Mountains Conservancy
USFS – United States Forest Service

Study Process

Comments regarding the study process primarily pertained to suggestions for outreach, requests to extend the public comment period, outreach materials, and the study area extent. More outreach to schools and cities was suggested, along with more multicultural outreach strategies. Outreach to more stakeholder groups was also recommended, such as off-highway vehicle users. Some emphasized the importance of outreach to historical groups within the study area to ensure local cultural history is preserved and enhanced. It was also suggested that Native American stories and indigenous culture be incorporated into the planning process. There was a request for more public meetings on weekends as opposed to week nights due to evening traffic. There were multiple requests to extend the comment period, which was extended by the NPS from 60 to 120 days.

Regarding the products and outreach materials generated by the study team, some commenters felt the maps needed to be better linked to the text and to more clearly show which areas were included in each

alternative. Other commenters found the study to be well-written with informative outreach materials and noticed that previous public input had contributed to the development of the alternatives.

Some commenters felt that the Little Tujunga, Big Tujunga, and Arroyo River corridors as well as West Coyote Hills should be included in the study area, while others felt that San Antonio Canyon should not be included.

Resource Description

Comments on the resource description (Chapter 2) primarily included suggestions for technical corrections and additional information to be included in the study report (see errata for draft study report/EA).

Natural Resources

Climate and Topography. One comment suggested that the climate description explain the rain shadow effect on the north side of the San Gabriel Mountains. Comments on the topography description suggested corrections to the elevation of the highest peaks in the study area. One commenter suggested that the NPS further clarify use of the names “Mt. Baldy” and “Mt. Antonio.”

Water Resources. Comments on the water resources section primarily included technical corrections and suggestions for additional information about the Santa Fe Dam and Whittier Narrows Dam basins. Other commenters thought the word “watershed” needed to be better defined, and that Big Tujunga Canyon should be considered significant for contributing 14% of the water in the Los Angeles River. It was suggested that the watershed map include the broader Arroyo Seco watershed boundary within the Los Angeles River watershed.

Vegetation and Wildlife. Comments on vegetation and wildlife primarily included suggestions for additional information and corrections to descriptions of vegetation, habitat, and special status species. Other comments suggested that the study should mention extirpated species and be mindful of an ongoing scientific debate about how to classify coastal sage scrub. The availability of detailed vegetation mapping for the Puente Hills Habitat Preservation Authority Preserve was also noted.

Cultural Resources

Comments on cultural resources requested clarification on historical dates and activities and associations of Native American groups. Some commenters also provided suggestions for additional information to be included in the study about Native American groups and viticulture and wine production that historically occurred in the San Gabriel Valley.

Recreational Resources

Suggested changes to the description of recreational resources were primarily correct or clarify management of recreational resources described. This included corrections for the Rancho Santa Ana Botanic Garden, the Whittier Narrows and Santa Fe Dam basins, the Puente Hills Habitat Authority

Preserve, the Rio Hondo and San Gabriel river bike trails, and the Juan Bautista de Anza National Historical Trail.

Cultural differences in recreation within the study area were also noted, such as the contrast between groups that routinely use the river heavily, and others that avoid or complain about crowded areas.

Significance

The majority of comments that the NPS received about significance expressed support and agreement with the study findings for national significance. There were also comments that expressed concern that some of the significance statements were overstated. For instance, one commenter felt that the “dynamic river systems” are actually very similar to river systems in other U.S. Forest Service (USFS) and Bureau of Land Management (BLM) areas. Another commenter believed that the importance of freshwater fishes in the study area was overstated. For others, the high number of homes, businesses and infrastructure in the study area seemed to contradict a finding of significance.

The NPS also received comments about additional resources that may be considered nationally significant including cultural resources related to the historical development of vineyards and citrus orchards and sites in the Puente Hills associated with the Portola Expedition.

Suitability

While many of the comments agreed that the study area was suitable for inclusion in the National Park System as a national recreation area, others thought that the amount of development within the study area suggested it was unsuitable, or that in comparison with other national parks across the country, it did not meet the standards of the NPS. For instance, some felt that the San Gabriel Mountains and the Angeles National Forest (ANF) do not meet suitability criteria because the multiple-use management policies are incompatible with NPS management policies.

Feasibility

Some commenters questioned the feasibility of implementing the action alternatives, given the current government deficit and economic crisis. Objection was expressed for federal spending for land acquisition in particular, noting difficulty in caring for federal lands as evidenced by the NPS maintenance backlog and staffing cuts. Others comments expressed concern that funding for a new NRA would be taken from other national parks, or from the ANF, and questioned whether any new money would be shared with ANF and benefit all areas of the ANF, not just the part within the study area.

Commenters who were optimistic about feasibility noted that a partnership structure could leverage more funding, and that innovative new sources of funds could be found.

Need for NPS Management

A large number of comments supported the need for NPS management in the study area. Expertise and assistance that commenters felt the NPS could provide included management of special status species, education and outreach programs, funding strategies, and experience with partnerships and collaborative management. Some commenters felt that adequate protection of the resources required NPS involvement as well as land acquisition. Others suggested that the NPS would be more successful at watershed protection than other agencies in the Los Angeles Region had been, could provide more resources to care for the area, and would attract additional revenue.

Other commenters felt there was not a need for NPS involvement and that an overlay by another government agency would be costly, inefficient, and would direct money to administration rather than to maintenance and operations. Some commenters stated that more analysis was needed to demonstrate the NPS could provide superior management, and that the findings were swayed to support the inclusion of NPS.

Alternatives

Overall Summary

Most of the comments received were about the study alternatives. The vast majority of comments supported alternative D, San Gabriel Region National Recreation Area, expressing a desire for NPS involvement over a broad geographic area and a need for additional funding for the Angeles National Forest. Many others supported Continuation of Current Management, the no action alternative, often questioning the need for NPS management or expressing concern that NPS involvement would lead to more restrictions. In comparison, support for alternative A, San Gabriel Mountains National Recreation Area, and alternative C, San Gabriel Watershed National Recreation Area, was slight.

The alternatives section of the comment summary begins with comments on items common to all alternatives, followed by comments on each alternative individually, including suggested changes for each alternative. Due to the large number of comments about alternative D, this alternative has additional subsections which include concerns, suggestions for management, suggestions for interpretive and educational opportunities, suggestions for boundary modifications, suggestions for additional designations, and suggestions for recreational opportunities and access.

Some of the local agencies that initially expressed concern about alternative D later expressed support when it was clarified that there would be no change to local regulatory authorities and jurisdictions. After the comment period had closed, the Los Angeles County Board of Supervisors passed a resolution supporting alternative D.

Actions Common to All Alternatives

The draft study report/EA described a series of actions common to all alternatives. Such actions acknowledged that under all alternatives local land use control and regulatory authorities would be

retained and that private property rights would not be affected. There was widespread agreement, both directly and indirectly, for the actions common to all alternatives (draft study report/EA, p. 164). One organization highlighted its agreement with three of these items: 1) retention of local land use and existing regulatory authorities; 2) protection of water supply, flood protection, and sanitation infrastructure facilities and functions; and 3) private property rights. For further reinforcement of existing regulatory authorities, another organization requested that specific language be added to the items common to all alternatives stating that administration and management of Recreation Forest System Lands would not change. Many of the concerns expressed in the comments are addressed in the statements common to all alternatives (See NPS Response to Substantive Comments).

Continuation of Current Management (No Action Alternative)

A number of commenters preferred the no action alternative. Preference for the no action alternative was primarily based on a desire for continued USFS management of the ANF. Some commenters felt that protection and expansion of recreation opportunities were a high priority in southern California, but that an NPS overlay on forest lands, as proposed in alternatives C and D, was unnecessary and lacked sufficient justification. These commenters also expressed concern that NPS involvement could lead to restrictions on access and use. Others felt that the USFS NRA designation in alternative A would create increased workloads for USFS staff due to extra layers of administration without clear benefits for USFS. Support for the no action alternative was also centered on concerns about increased government spending given the U.S. deficit and potential environmental impacts from increased recreation. Others felt the alternatives did not address certain problems such as illegal immigration or the need for more fire funding. Some commenters suggested that the USFS should be provided with additional funding without a national recreation area designation. Others noted a decline in services and recreational opportunities within the ANF over time, stating that funding was needed for fire suppression, managing riparian areas, rebuilding the ANF to a former level of service, and improving trail maintenance for safety and access. Some of these comments requested that funding go to USFS rather than to the NPS or a partnership.

Other Comments on Current Management

Current management of special use permits in the Angeles National Forest was supported, particularly for developed ski areas and recreation residences which these commenters urged should continue under USFS management.

Some commenters favored the USFS's multiple use mission, emphasizing economic use of natural resources, whereas other comments felt the NPS would take better care of the resources and the visitors. Concerns about current USFS management included: a need for greater enforcement of laws about littering; misinterpretation of laws about mining; destruction, closure, and decay of historic properties; use of non-native trees in restoration efforts; inadequate protection of forest resources; money being spent on a renovation of the Supervisor's office in Arcadia rather than in the field; problems with the Adventure Pass as a funding source; and more public engagement was needed.

Other commenters focused on the need to recruit volunteers to work on trails and restoration projects on the ANF. Some had previously offered to volunteer and had been turned away. Others were concerned about trail closures due to budget shortfalls, and offered to volunteer on trail maintenance projects to reopen areas such as the section of the Pacific Crest Trail near Mill Creek Summit. Others suggested that the USFS should address bark beetle impacts, control access, collect entry fees, and manage parking and public conduct near communities. Some commenters also expressed a desire that the washed out section of Highway 39 near Highway 2 be reopened for emergency purposes only.

Alternative A: San Gabriel Mountains National Recreation Area

Commenters in support of alternative A generally favored a continuation of USFS management over establishment of a unit of the national park system. Some commenters preferred alternative A because they opposed applying an NPS designation to private property without consent of landowners. Others wanted lands to remain under multiple use management, and expressed concern that the other alternatives would limit some types of recreation such as off-highway vehicle use. Many comments supporting alternative A recognized a need for more staff to properly protect, maintain, provide visitor services, and interpret the San Gabriel Mountains, but favored a simpler, less costly organization involving only one federal agency. Some comments supporting alternative A thought this was the no action alternative or said that current management was sufficient. Other comments noted that ANF had traditionally been used more for recreation than other uses, and converting to an NRA would be more consistent with that emphasis.

Suggested Changes to Alternative A

It was suggested that alternative A be expanded to describe the benefits of a USFS NRA in which non-traditional authorities would allow the USFS to enhance recreational opportunities in the San Gabriel Mountains. Other comments suggested that alternative A would only be viable if the USFS could receive additional funding and staffing. More specific suggestions for changes to alternative A included:

- monitoring San Gabriel Canyon for vandalism and gang activity
- the possibility of user fees to improve the area for fly fishing
- a desire to designate the West Fork of the San Gabriel River from Cogswell Dam to the highway as a catch and release fishing area
- a request to increase the number of trails used for mountain bikes and motorcycles
- adding plans for off-highway vehicle recreational development including expansion of motorized vehicle routes
- restoring educational and recreational opportunities previously offered in the Crystal Lake, Rincon, West Fork and East Fork areas
- granting new authorities to the USFS similar to those under NPS managed national recreation areas

Alternative C: San Gabriel Watershed National Recreation Area

The NPS received a relatively small number of comments about alternative C. Some commenters preferred alternative C because they felt that that alternative D was too large and exceeded the authorized parameters of the study. Others felt that the entrance to the San Gabriel Canyon is most in need of resources, and that areas not adjacent to the San Gabriel and Rio Hondo Rivers such as the Puente-Chino Hills seemed like separate units with different audiences. Some comments noted that the river corridor in alternative C was consistent with other NPS community planning efforts and the San Gabriel River Corridor Master Plan. Others expressed support for the concept of the San Gabriel Watershed NRA being managed by a voluntary partnership which retained local ownership and local land use authority.

Suggested Changes to Alternative C

The NPS also received comments with suggestions for changes to alternative C. It was recommended that in both alternatives C and D, the reopening of existing visitor centers in the ANF be identified as a priority. For example, the Chilao visitor center which features exhibits about the Chumash and local history has been closed for several years.

Other comments suggested that the boundaries of the San Gabriel Watershed NRA should not detract from the focus on the mountains. These comments were in favor of connecting the two ANF units to create a wildlife corridor, but were not in favor of including the Cucamonga Wilderness and areas to the north. Land acquisition along the San Gabriel River was viewed by some commenters as unnecessary. Due to potential conflicts with permits associated with waste management infrastructure, it was recommended that the sanitation facilities be excluded from any proposed NRA.

Some commenters felt that the concept of “cooperative management” is contradicted by the NPS having a lead role in management and were concerned about the implication that the NPS would have more influence over policies and direction.

Alternative D: San Gabriel Region National Recreation Area

The vast majority of comments on the study (over 95%) expressed a preference for alternative D, the San Gabriel Region NRA. Most of the commenters in support of alternative D stated that this alternative was preferred because it would provide greater conservation and protection of water resources, air quality, wildlife/wildlife corridors, and cultural resources. This perception was often based on the fact that alternative D had the largest NRA boundary with the potential to provide more visitor services over a greater area. Greater conservation of resources in the area was seen as important for future generations, particularly as the region’s population continues to rise. Most of the comments that supported alternative D also cited the potential for more recreational opportunities, particularly in urban areas that are deficient in outdoor recreation opportunities. Commenters also supported and valued NPS technical assistance towards creating a network of parks and open space. Many of these commenters cited the long-term public health benefits associated with improving outdoor recreation opportunities. Public comments also supported providing transit options for communities to better

access existing recreation areas. Greater interpretation and educational programs were also seen as an advantage of alternative D.

Many of the comments in support of alternative D saw value in NPS expertise and the potential for leveraging more funding for the area as a result of the designation. NPS expertise in education/interpretation, resource protection, partnerships and collaboration, visitor services, and technical assistance for planning and conservation were cited as needed services. Most commenters felt that additional funding that may result from the designation is needed to meet resource protection and recreation objectives. Numerous commenters also cited potential economic benefits from visitor spending and job creation as a rationale for supporting alternative D. Some comments specifically cited the economic benefits that the Santa Monica Mountains National Recreation Area has provided for the region including millions of dollars in visitor spending and the creation of hundreds of jobs.

Many commenters cited the need for improvements to the ANF as their primary reason for preferring Alternative D. Comments cited deficiencies in ANF resources, particularly for management of intensely used visitor areas, and suggested that additional funding was needed to improve ANF visitor facilities such as restrooms, trash cans, and signage. A few commenters felt that more amenities and visitor facilities were needed on the northern side of the ANF. Other commenters recommended additional ANF funding for planning, law enforcement, restoration efforts, and resource protection.

Concerns about Alternative D

Some commenters could not support alternative D because they felt it would promote recreation in areas of the Angeles National Forest impacted by overuse. These commenters noted that impacts and waste from the current level of recreation is already excessive and impacts are occurring in residential areas from mountain bike traffic and congested parking near trailheads. Other commenters expressed concern that the designation could restrict existing uses or impose additional restrictions on special uses in the ANF.

Suggestions for NRA Management in Alternative D

The comments included a range of suggestions for the management of the San Gabriel Region NRA as described in alternative D. Suggestions were made in the following areas:

Ecosystem Protection and Watershed Management. Specific suggestions regarding protection of ecosystems and watersheds included reintroduction of species, providing additional funding for nonnative plant management, restoration for California steelhead, and greater protection of wildlife corridors. One comment suggested that the NRA develop a comprehensive plan for the protection of plants and wildlife. Some commenters felt that Big Tujunga Canyon should receive the same amount of management emphasis as the San Gabriel Canyon.

Oil and Gas Development/Mining and Minerals. Some commenters expressed a desire to see restrictions or bans on oil and gas development and mining. Specific concerns included proposed petroleum extraction in the Whittier Hills preserve and protecting a site where aggregate mining is

planned for development in the Santa Clarita area. Some commenters felt that implementation of alternative D should include a ban on strip mining.

NPS Roles. Comments suggested that the NPS have a maximum role within the NRA partnership. For some commenters this meant a stronger level of influence over policies and direction of the NRA. Some of these commenters suggested that NPS protection policies be applied over the multiple-use policies of the USFS while others suggested that NPS should fully administer lands within the NRA. Others had more specific suggestions for an NPS role including NPS taking the lead in education and interpretation and acquiring lands to prevent undesirable future development. Many comments expressed a desire to see the existing Santa Monica Mountains National Recreation Area serve as a model of successful cooperative management.

Partnerships. Some comments suggested specific agencies or organizations that should be included in the potential agency partners listed in alternative D. This included cities (Los Angeles and Whittier) and other agencies including Wildlife Corridor Conservation Authority and the Mountains Recreation and Conservation Authority.

Law Enforcement. Comments suggested that improved security and law enforcement should be a management emphasis for alternative D, primarily in the San Gabriel Mountains

Job Training and Volunteer Programs. The NPS received a number of comments requesting that alternative D include job training and volunteer programs. Some commenters suggested that job training should be focused on youth and veterans. Such programs could include apprenticeships or internships. Others commented that the NRA workforces should reflect the diversity of the region. Volunteer programs were suggested for trail work, interpreters, docents, and maintenance.

Funding Priorities. A number of comments made suggestions for funding priorities should alternative D be implemented. Funding was specifically desired for resource protection, volunteer coordination and staffing, recreation, planning, wildlife management, and visitor services. More funding for the ANF was seen as necessary to meet the objectives of alternative D and some commenters requested that this be expressly stated. Some commenters discouraged using funds for visitor centers and buildings while others wanted assurances that funding for the proposed NRA would not detract from existing NPS units or from current ANF funding. One commenter suggested that mitigation funds should be made available to other nearby national forest canyons that may also receive increased visitor use including Deep Creek, Mill Creek, Lytle Creek, and Cajon Wash. Some comments suggested that no fees be charged for the NRA.

Suggestions for Interpretive and Educational Opportunities in Alternative D

Many of the comments in support of alternative D suggested specific management approaches for interpretation and education. The range of comments included broad programmatic suggestions, specific interpretive opportunities centered on topics or locations, and suggestions for interpretive media and facilities. There was broad support for an NPS role to coordinate interpretive and educational programs. Some suggestions for educational programs included providing information on the health benefits of recreation, wilderness survival, creation of living classrooms in the ANF, ranger-led programs

such as hikes and campfire talks, nature programs for children, and native gardens for learning. Other commenters suggested that alternative D educational and interpretive programs should emphasize preservation of cultural heritage, recognizing the cultural contributions of people of color, women, and Native Americans. Some commenters emphasized the importance of partnerships with local communities and communities of color in educational and interpretive efforts. A number of comments emphasized that the creation of a volunteer program could assist in providing interpretative and educational programs within the NRA.

Specific interpretative programs suggested in the comments include: interpretive geological tours in the San Gabriel Mountains and along the San Andreas fault; providing opportunities to educate visitors about the varied ecosystems represented in the NRA (desert to mountain to coastal environments); and making the San Dimas Experimental Forest a living history destination for forest visitors. Some comments suggested interpretation of specific cultural sites including Owen Brown's Grave site, the sites of World War II Japanese relocation assembly centers, the site of the original San Gabriel Mission, sites associated with the Juan Bautista de Anza National Historic Trail, and sites associated with Native American heritage.

The NPS received many suggestions for specific types of facilities and interpretive media including kiosks, education centers, waysides, and signage. A number of comments emphasized a desire for culturally appropriate interpretive elements in multiple languages to engage more visitors to see national park lands and the NRA. Some suggested that priority should be given to providing staff to open existing visitor centers within the ANF, as opposed to constructing new facilities.

Suggestions for Boundary Modifications to Alternative D

The NPS received numerous comments requesting modifications to the boundary proposed in alternative D. The vast majority of comments recommended expanding the NRA boundary to include more wildlife corridors, additional national forest system lands, and more urban areas within the San Gabriel River watershed. A few comments suggested removing areas from the proposed boundary, including the Puente Hills, the Rio Hondo corridor, areas north of the ANF, and sanitation facilities such as active landfills.

The two areas that commenters most commonly suggested for inclusion in the San Gabriel Region NRA were the eastern Puente-Chino Hills and the eastern San Gabriel Mountains. Rationales for adding more of the Puente-Chino Hills included protection of the coastal sage scrub critical habitat, oak and walnut woodlands, and that area wildlife rely on broader habitat connections to Chino Hills State Park and the Cleveland National Forest. Other commenters suggested that inclusion of the larger Puente-Chino Hills corridor would facilitate completion of a trail network proposed for the area including the Schabarum-Skyline Trail. Some commenters raised concerns that the logic of not including the eastern Puente-Chino Hills does not correspond with the fact that the study notes that designation would not impact local and use authority, while other commenters suggested that alternative D be revised to recommend that the NPS be authorized to include the eastern Puente Hills administratively, without further legislative action, should they become available for purchase. Some comments questioned why the eastern San Gabriel Mountains were not included in the San Gabriel Region NRA. Comments specifically suggested that the

NRA be expanded to include the entire mountain range from SR-14 to I-15 including Ice House Canyon, Cucamonga Peak and Wilderness to the east. Expansion would allow for conservation of the entire mountain range and allow for better interpretation of the geologic significance of the San Gabriel Mountains.

The NPS also received numerous comments requesting that more urban areas be included in the alternative D boundary, including the entire San Gabriel River watershed. Specific suggestions include the Coyote Hills, the Montebello Hills, Eagle Rock, San Fernando, Highland Park, Pasadena, Sierra Madre, and expanding the river corridor in urban areas to include entire cities along the corridor. Other suggestions included the estuary of the San Gabriel River, Los Cerritos wetlands, Seal Beach, and river corridors that run south of Whittier Narrows. It was noted that areas south of Whittier Narrows are the most densely populated region in California after San Francisco.

A number of areas adjacent to the alternative D boundary were recommended for inclusion. Some commenters suggested including the northern unit of the Angeles National Forest in the NRA based on concerns that this portion of the national forest could become orphaned, unfunded, and poorly managed. A few commenters suggested that the San Gabriel Region NRA should be contiguous, or include connections to the Santa Monica Mountains NRA including the Rim of the Valley Trail. Other adjacent areas recommended by commenters for inclusion in the NRA were the Verdugo Mountains and the San Antonio Creek Watershed.

Some commenters wanted to see the NRA concept presented in alternative D expanded to include broader areas in southern California such as the San Bernardino National Forest, Bureau of Land Management lands, California State Parks, County Wilderness parks, the Palomar Mountains, and the San Jacinto Mountain area.

Several commenters recommended that certain areas be removed from the NRA boundary described in alternative D. The Sanitation Districts of Los Angeles County requested that active landfills and other sanitation facilities be removed from NRA proposals to avoid plans and permits that would be detrimental to the Sanitation Districts' mission. Some residents in the Antelope Valley area requested that private lands north of the ANF be removed from the San Gabriel Region NRA. Some commenters suggested that the NPS should remove the Puente-Chino Hills and Rio Hondo areas since they are not geographically close to the San Gabriel Mountains.

Suggestions for Additional Designations to accompany Alternative D

The NPS received numerous comments requesting additional designations for the San Gabriel Region NRA. Many of the comments requested the establishment of new or expanded wilderness areas in the San Gabriel, Castaic, and San Bernardino Mountains. Such areas included Red Mountain, Red Rock Mountain, Fish Canyon, Condor Peak Proposed Wilderness, Castaic Proposed Wilderness, Cucamonga Wilderness additions, Sheep Mountain Wilderness additions, and San Gabriel Wilderness additions. A few commenters stated that they did not want to see additional wilderness designations or expansions in the study area. Also recommended were Wild and Scenic River designations for Middle Lytle Creek; the West, North and East Forks of the San Gabriel River; and San Antonio Creek from the upper slopes of

Mount San Antonio. Some commenters also recommended Wild and Scenic River designations for rivers in the San Bernardino National Forest.

Suggestions for Recreational Opportunities and Access for Alternative D

The NPS received a wide range of comments pertaining to recreational opportunities and access within the San Gabriel Region NRA. Numerous comments requested that alternative D strongly emphasize the need for more parks and better recreational access for communities or neighborhoods that are currently deficient in such opportunities. Some commented that this emphasis is consistent with the NPS "Call to Action" priority to have the NPS "fully represent our nation's ethnically and culturally diverse communities." A few comments suggested that Azusa Canyon be the focus of new recreational facilities such as improved trails and paths.

A number of commenters requested more specificity about the types of recreational uses that would be permitted in alternative D. Some commenters suggested that alternative D include stronger language indicating that multiple-use of trails, including hikers, equestrians, runners, and cyclists, would be the goal for new trail projects, as well as for trail restoration projects. Some commenters were concerned that an NRA designation could restrict recreational uses. Other commenters suggested that in cases where resource protection necessitates a recreational use or activity to be discontinued, that viable alternative locations for those same uses or activities should be provided so as not to diminish already limited recreational resources. One commenter suggested that more fishing opportunities are needed on streams such as Big Tujunga and Pacoima Canyon.

Environmental Assessment

Level of Analysis

Comments on the environmental assessment primarily included suggestions for supplemental information and additional analysis or consideration of impacts on recreational uses and opportunities, socioeconomics and environmental justice, local land use and existing regulatory authorities, biological resources, and water resources. Some commenters called for completion of a full environmental impact statement, extension the comment period, or preparation of a supplemental environmental assessment. Additional impact topics suggested for analysis included floodplains and greenhouse gases. Several suggested that the indirect and unforeseen impacts of as-yet-unwritten legislation implementing the alternatives should be addressed. Criticisms of the analysis also included subjectivity and a lack of consistency across alternatives, making it difficult for the reader to compare them. Others were pleased that the analysis addressed social equity, human health, economic vitality and job creation, and cultural and spiritual values, in addition to resource impacts.

Recreation Use and Visitor Experience

Some commenters felt that alternative D would have the most beneficial impacts on recreational opportunities. Others expressed concern that a NRA designation would restrict access to recreation. In particular, they were concerned that USFS roads would close, hunting would be restricted to

accommodate more visitors, permit systems would be instituted, and additional wilderness designations would occur. Off-road vehicle use, hunting, rock collecting, gold mining, and downhill skiing were among the activities that some commenters felt were most jeopardized by an NRA designation and in need of greater attention in the impact analysis.

A concern was expressed about whether the recreation residence special use permits in the Angeles National Forest would continue to be administered by the USFS in the same way under the action alternatives, and about potential impacts if there was a change. This concern was raised for recreation residences in San Gabriel Canyon, Big Santa Anita Canyon, Tujunga Canyon and elsewhere in ANF. It was suggested that recreational cabins represent historic and cultural values. Some commenters and requested that any resulting legislation should specify that management of these permits would continue under USFS policy as in the past.

Socioeconomics and Environmental Justice

Some commenters felt that the economic benefits of an NRA designation were not adequately described in the draft study report/EA. Others saw negative economic impacts from increased bureaucracy related to future commercial and public activities including mining, communication towers, utilities, film production, skiing, and a general increase in federal regulation.

Commenters generally supported the environmental justice impact analysis in the draft study report/EA. Those who commented on environmental justice felt that alternative D best addressed this issue, primarily by the potential increase in recreation opportunities and open space in park-poor urban areas. These commenters felt that more such opportunities would contribute healthier and safer communities, as well as greater equity between different demographics in the Los Angeles region. Some commenters provided additional data and information supporting beneficial impacts related to socioeconomics and environmental justice.

Land Use, Regulatory Authorities, and Jurisdiction

Many commenters were concerned about the effect of an NRA designation on local land use control and existing agency authorities. They felt that these potential impacts should be explored further in the analysis. Some felt that designation would give the NPS some degree of control over local land use decisions through the imposition of new regulations and restrictions. Some initially concerned agencies later expressed support for an NRA after the formal comment period based on clarification that there would be no changes in jurisdiction or to operations and infrastructure essential for public health and safety.

Different USFS and NPS Policies. Some commenters were concerned that an NRA designation on USFS land would transfer management from USFS to the NPS resulting in undesirable changes such as loss of hunting and fishing opportunities; discontinuing special events such as the Angeles Crest 100 Mile Run; closing the packing station at Chantry Flat; discontinuing privately owned services such as Newcomb Ranch; or not allowing permits for recreational cabins.

Some commenters expressed a preference for USFS management based on experience with existing national park units that restrict hunting, fishing, and off-road vehicle use; confusion over management by multiple jurisdictions at Santa Monica Mountains NRA; conflict over commercial use such as oyster harvesting at Point Reyes National Seashore; and high visitation, facility development and fees at Yosemite and Grand Canyon national parks. Other commenters were concerned that a change to NPS management would lead to entrance booths and fees on forest highways. Some did not believe an NPS NRA would allow USFS to retain management of the forest. These commenters felt that assurances to the contrary were insufficient, and the initial designation would evolve in scope and authority over time.

Transportation Infrastructure. Concern was expressed that the alternatives would have impacts on transportation infrastructure, roads and other projects such as the East-West Freight Corridor. Some commenters felt that assurances in the study that the alternatives would not affect existing agencies providing these services were not specific enough or farsighted enough to overcome future NPS regulations and restrictions brought about by a new designation.

Water Supply, Flood Protection, and Sanitation Facilities. Several agencies expressed concern that their missions related to flood protection, water supply, water quality, and hydro- electric power would be impacted by an NPS designation. These commenters were concerned about potential conflicts of interest, such as regulation of dam operations to serve biological resources or recreational needs which could conflict with water delivery to water rights holders. Another noted that the City of Pasadena is contractually obligated to maintain the Azusa Conduit to be able to deliver water and requires access to the conduit for inspection, maintenance and repair. One comment noted that recreation areas at the Santa Fe and Whittier Narrows dam basins are currently managed by the Los Angeles County Department of Parks and Recreation, and that additional management by any agency would require review by the U.S. Army Corps of Engineers' Office of Counsel to prevent conflicts with flood risk management requirements. The U.S. Army Corps of Engineers expressed concern that the study did not address the congressionally authorized purpose of the dam basins, and the fact that these lands are subject to flooding at any time. The comments also pointed out that the lack of ditching on both sides of the roads in the river corridor contributes to the problem of flooding.

Access. Some commenters were concerned about the ability of communities and agencies to build and maintain needed infrastructure, freely access their project sites, extract important mineral resources, or keep up financially with new requirements or needs associated with changing uses. A few commenters desired that the alternatives not limit access to residents, mining interests, and recreationists.

Future NPS Land Acquisition. Some agencies expressed concern that restrictions on land acquired by the NPS may interfere with their ability to accomplish their missions either by preventing access or by eliminating sources of funding. These commenters were concerned that future NPS land acquisition could: 1) indirectly prevent access to public hunting and fishing on non-NPS land; 2) limit agency access to monitor and manage wildlife populations, particularly where mechanized travel might be necessary; or 3) create a gap in vector control measures that could threaten public health.

Partnership Approach. The complexity of decision-making and oversight by multiple land management partners was cited as a potential impact on local land uses. One commenter felt the partnership approach would give too much influence and authority to non-governmental organizations.

Private Lands. Some commenters expressed concern about use of eminent domain, regulation, and easements would affect a large number of farms, ranches, and single family homes. Comments expressed concerns that private lands could be acquired through eminent domain. There was also a concern that willing sellers may not be offered reasonable compensation based on a past example in which a landowner was offered less than the appraised value.

Some commenters were concerned that if these properties were acquired by the federal government there would be a loss of property tax revenue which would affect funding for local services such as schools, fire, and police.

Other concerns centered on how road access may be changed by an NRA which may limit the ability of inholders or emergency responders to access private property within the ANF, or limit the ability of inholders to maintain these roads with heavy equipment. Some commenters were concerned that if some of the alternatives were implemented, permits would need to be purchased to enter the ANF near their home or that there would be entrance fees if the area became a national park.

Some commenters acknowledged that the study made it very clear that the NPS is not recommending acquisition of private property through eminent domain. These commenters expressed support for explicit language prohibiting the use of eminent domain to be included in any legislation resulting from the study. Other comments also suggested strong, irreversible language to protect property rights and access to private property within the proposed area.

Impacts on Biological and Water Resources

Some commenters were concerned that designation would lead to increased visitation which, in turn, would increase adverse impacts on natural resources. Wildfire, pollution, waste, compromised water resources, and the introduction of exotic species were all cited as examples of impacts that would follow from increased recreation and have adverse impacts on biological resources.

Comments on Other Topics

Government Cost and Funding

Some commenters thought that an NRA might be an unfunded mandate because the alternatives would be very expensive to implement. Others thought that new sources of funding may be found such as different types of passes or Homeland Security, but the potential for new fees was also a concern. A number of comments said the funding should go to the existing management of the ANF, to pay for outreach, the existing trails system, managing the area's high visitation, and re-opening closed areas. Some expressed concern that funding was being spent on the study process rather than on-the-ground improvements.

Other commenters noted a willingness to contribute funds through hunting and fishing licenses or tax increases. There was a concern that the ability to contribute through hunting and fishing licenses might be lost with NPS involvement if these activities became prohibited.

Protecting natural resources was also seen as an important use of government funds. Some suggested that fire protection funding should be separate from general operational funding.

Roles and Partnerships

It was recommended that the NPS and USFS implement a Service First initiative to carry out shared resource management objectives and provide the enhanced recreational opportunities suggested by the study. More collaboration between NPS and USFS on the study was also recommended. Other comments suggested that the study further describe the envisioned partnership in terms of whether it would be managed by a private or governmental entity and who the entities in the partnership would be. The Mountains Recreation and Conservation Authority was recommended as one of the agencies that would contribute to the cooperative management in the study area. Efforts to protect the Puente Hills Habitat Authority Preserve from oil drilling, and the programs of the Santa Clara River Watershed Conservancy were also seen as compatible with the partnerships proposed in the study. Some commenters felt there should be a stronger role for wildlife management agencies. Other commenters felt that local organizations in general, such as historical societies partnering on education and conservation corps partnering on jobs, should be included and the study should specify that the NRA will invite local input into the partnership. There were also commenters who felt that multi-agency joint powers authorities are not always effective, particularly in the area of law enforcement. Questions were raised about how partner disagreements would be resolved and the role of NPS and other partners with volunteer groups such as the Friends of the Angeles. Santa Monica Mountains NRA and Boston Harbor Islands NRA were noted as good models for partnerships and cooperative management.

Natural Resource Protection

A variety of comments focused on different aspects of natural resource protection:

Vegetation. Comments on vegetation management stated that tree planting in the area of the Angeles National Forest burned by the 2009 Station Fire should be a restoration priority and that tree planting in general was important for carbon capture, shade, and water storage.

Wildlife. Comments on wildlife noted the importance of providing habitat to keep animals from coming into urban areas, and to maintain healthy wildlife populations. Some comments suggested creating habitat connections between the Whittier Hills and the Whittier Narrows, for both wildlife and recreation. Other comments supported wildlife corridors and protection of foothill resources in San Dimas, and habitat linkage between the San Gabriel Mountains and the Santa Susana Mountains. The comments noted the role of the Santa Susana Mountains and Simi Hills in the movement of plant and animals populations between the Santa Monica Mountains and the San Gabriel Mountains. It was also noted that wildlife would benefit from a protected wildlife corridor near Newhall and San Fernando passes that would cross Highway 5 and Highway 14.

Fisheries. Other comments expressed concern about protecting fisheries. It was pointed out that the rainbow trout population below Morris Dam to the Fish Creek confluence qualifies the region as a cold water fishery which is subject to minimum flow requirements. Dead fish observed in the lower reach of Roberts Canyon Creek raised the question about whether fertilizer or other contaminants from developed areas west of the 39 near Encanto were affecting this area. Some commenters suggested that the genetics of the rainbow trout be assessed to ascertain whether they are native and to consider appropriate management, such as the possible discontinuation of mining on the East Fork of the San Gabriel River. Others felt that fisheries are the most neglected resource in the San Gabriel Mountains.

Fire Management. Some comments expressed concern that the NPS and USFS had different fire management philosophies and questioned whether the NPS would be supportive of the aggressive fire suppression and prevention strategies practiced by the USFS. Other comments felt that the NRAs proposed for both the San Gabriel Mountains and Rim of the Valley would create a potential fire hazard and the National Park Service would not clear vegetation on NPS land or allow other land owners to clear brush either. Some commenters felt that the alternatives should include a comparison of fire risk based on different levels of activity in the study area. General concern was also expressed about the threat of fire, with commenters wanting a quick response, a comprehensive fire program, and a unified fire protection / prevention plan to provide more resources. Other comments felt the study should include more detail on the fire history and the effects of fire in the study area, noting that the discussion of geology was much more in depth than the discussion of fire which also seemed of high importance in the study area. Fire protection concerns expressed in the comments included high insurance premiums for homeowners adjacent to public open space regardless of jurisdiction because vegetation is not cleared on federal, state, county or city land and these governments are not held liable for damage from fires that move across their land. Continued road maintenance for both residential and emergency access was also highlighted as a concern. Some comments requested assurance in any resultant legislation that current levels of fire protection would not be reduced in the creation of an NRA.

Water Quality. Some commenters emphasized that protecting increasingly threatened water resources is vital to environmental health and should be a high priority. Some commenters noted trash in the river, frequent bathing in some areas, and algae blooms as key water quality concerns. These problems include trash deposited at the mouth of the San Gabriel River on Seal/Huntington Beaches, surges of trash during storm events, and regular spills from a factory north of Whittier affecting birds and fish. The comments suggested that aerial surveys of the river during storm events could identify algae as an indicator of run-off with the greatest threat to water quality due to trash with high biological content. Mining pits were also identified as a possible contributor to algae growth. Complaints about the odor from the algae in the water during the summer of 2011 when water quality was exceptionally poor and the need to treat algae-contaminated water with reverse osmosis were discussed. Other comments suggested that water leaving the watershed may need to be filtered before it enters the ocean. Finally, some comments identified groundwater contamination from the Morris Dam superfund site above Azusa in the San Gabriel Valley as an ongoing concern, partly due to cancer increases in Covina and Azusa, especially breast cancer. A public meeting with a panel of speakers to address health issues, the dam cleanup, drinking water supply and other environmental safety was also requested.

Resource Protection in General. A series of general comments about natural resources expressed a desire for better air quality, better health, natural beauty, more parks and green areas, wild places for children, water conservation, protection of rivers and vegetation from contamination, more fire lookouts, more respect for forest laws, minimizing human impacts, education about critical habitat and animal migration patterns, planting trees, and protection of habitat, mountains, the river, open space for the Los Angeles area, California's natural resources, and interconnected ecosystems which are threatened by fragmentation by piecemeal development.

The comments also expressed the following concerns:

- Keep corporations away from the environment to protect it.
- Resource protection is more important than recreation.
- There is a lack of vector control on federal lands
- Graffiti, trash and impacts from gold prospectors need to be addressed.
- Avoid building facilities in ecologically sensitive resource areas.
- Noise pollution from low flying planes is increasing in the study area.
- Regular biological monitoring is needed to manage invasive pests such as the goldspotted borer. Visitors should not take contaminated firewood into the mountains.
- The leasing of burned forest land to Southern California Edison for development of geothermal grids should address potential environmental impacts. If people should not live within 2 miles of a grid, what about impacts to other species?

Recreation Management

A variety of comments focused on different aspects of recreation management:

Engaging Youth. The comments expressed a need to engage younger generations in different ways including social media because they are the future users of the study area.

Overuse and Existing Impacts. Multiple concerns about overuse were expressed including problems of spray paint, trash, illegal fires, poaching, building rock dams in the river to create pools, damage from gold mining, lack of proper maintenance, and heavy impacts by visitors along Highway 39. Problems identified in the Big Tujunga region were trash, homeless occupation, and wildlife corridors closed by private property owners.

The comments also expressed concern about mountain bike riders in Turnbull Canyon, Hellman Park, Beverly Boulevard, and in the City of Whittier which now has an ordinance prohibiting the use of public sidewalks for mountain biking. It was noted that in addition to crowding sidewalks, mountain bike riding in the City of Whittier had created noise nuisance such as night riding when bikes are being loaded back onto vehicles, and riders talking about their experience. A safety concern was also expressed about the length of time mountain bikers parked their vehicles at the intersections of local streets.

Dispersal. Some commenters suggested developing a small park at the base of the mountains with toilets, benches, and possibly a pool to disperse some groups from going to the mountains to swim and

cook. Others noted that water parks could provide cost effective recreation and adding a public plunge to an existing park or enlarging an existing park may reduce crowding at Whittier Narrows Dam Recreation Area.

Equestrian Use. Some comments expressed that it was important to allow horses on trails and to generally to be equestrian community friendly, similar to the Santa Monica Mountains Conservancy.

Off-Highway Vehicles. Other comments expressed concern that there was no mention of off-highway vehicle (OHV) access in the alternatives and a desire to see OHV access included. It was also recommended that the proposed NRA plan for the needs of the large OHV user group in the Los Angeles area. Others asked why off road vehicles would be allowed if the goal is to preserve the environment.

Access. Some comments expressed a desire for more recreational connections between the mountains and the valley, including pedestrian and bicycle access routes. Concerns about access included the lack of adequate parking, the need for a transit to trails program to provide access for the many people without cars, river access for school children, concern about closures to protect a plant or animal, entrance stations with fees on the Angeles Crest and Angeles Forest Highways typical of other national parks, and the need to reopen recreational areas that had been closed. The comments recommended non-discrimination among users from different areas, and pointed out that North Orange County is a densely populated, park poor area in needs of resources, particularly south of Santa Fe Springs. Other commenters wanted to see locked gates for roads into the Angeles National Forest for recreational use.

Concessions. It was suggested that an NRA designation could lead to an increase in concessionaires. Some commenters felt that concession services could make it harder and more expensive to use some areas such as Little Rock Dam where personal model boats can no longer be used, and a fee is now charged.

Hunting. Some commenters felt that hunting should not be allowed in the San Gabriel Mountains due to concerns about safety with a large human population using the area, and other concerns about species conservation and wildlife viewing opportunities. Other commenters were concerned that NPS management policy would prohibit hunting as well as possession of firearms within NPS units and that an NPS NRA would take away the right to hunt in the national forest. The comments also pointed out the value of hunting in managing wildlife populations, preserving heritage, and promoting support for land conservation.

Education and Interpretation. Some comments saw value in connecting children and families to nature, or using outdoor recreation as an extension of the classroom in formal education. The need for signs in multiple languages for Asian Pacific Islanders and other communities was noted. Plant and tree identification tags were also recommended, but it was also noted that signs and tags may be subject to graffiti and vandalism. It was also suggested that writing for the public about the vegetation of the San Gabriel Mountains, including the study, should use common names rather than scientific terms, in order to be more understandable.

Enforcement and Illegal Activity. Concerns about illegal activity ranged from comments about vandalism in the San Gabriel Mountains, particularly in the West Fork and Heaton Flats on the East Fork—to fears about visiting the ANF because of the potential for personal property damage. Increased enforcement and more stringent penalties were recommended to protect visitors to the ANF as well as flora and fauna. There was a concern about water contamination from frequent bathing, and other hazards from the large number of cooking devices being used in a small area.

Visitor Services. The comments recommended improved signage, access, and ADA compliance in the study area. There was also a concern expressed about how trails along creeks would be managed when they get washed out. The Nature Center Associates facilities were recommended as an example for visitor services.

Other Recreational Uses and Services. Other comments requested specific recreational uses and services such as:

- a place for military service and veterans to relax and recreate
- benches
- trash cans
- a small store
- activities for children and more places to play
- mountain bike access to trails
- restrictions on recreational mining
- a fast-food restaurant
- more bathrooms
- more recreational opportunities closer to where people live

III. Response to Substantive Comments on the Draft San Gabriel Watershed and Mountains Special Resource Study / Environmental Assessment

The study team reviewed all comments submitted on the *Draft San Gabriel Watershed and Mountains Special Resource Study and Environmental Assessment* (draft study report/EA). The following substantive comments were organized and analyzed by topic areas that correlate with sections of the draft study report/EA. The study team grouped similar comments before providing the National Park Service response. A substantive comment is defined by NPS Director's Order 12 (DO-12, Section 4.6A) as one that does one or more of the following:

- questions, with reasonable basis, the accuracy of information in the environmental analysis
- questions, with reasonable basis, the adequacy of environmental analysis
- presents reasonable alternatives other than those presented in the environmental analysis
- causes changes or revisions in the proposal

Comments that contain substantive points regarding information in the draft study report/EA or comments that need clarification are extracted below. Concern statements have been developed to summarize the comments. Corrections to the draft study report/EA are included in an errata document that is available on the study website. The final recommendations for the study are included in the *Final Recommendations* summary document and are also documented in the Finding of No Significant Impact (October 2012). The draft study report/EA, errata to the draft study report, and the *Finding of No Significant Impact* together complete the study process.

Resource Description

Public Concern: The Puente Hills Habitat Preservation Authority Preserve (Preserve) would be better classified as a “wilderness park” in the recreation description of the draft study report/EA. The entire Preserve seems to meet the definition of a wilderness park given in the draft study report/EA, which is defined as “large, undeveloped open spaces that provide passive recreational opportunities and protect habitat for wildlife.” The Puente Hills Preserve is currently mentioned under County and Regional Parks on page 84, the definition of which focuses on recreation.

Response: Although the Preserve may be managed similarly to wilderness parks, the study only refers to those parks specifically named as such in this category. The errata for the draft study report/EA reflects an expanded the definition of county and regional parks to include areas that focus on passive recreation and wildlife management.

Public Concern: Page 89 describes the Juan Bautista De Anza trail as being “planned” through the Puente Hills to coincide with the Skyline/Schabbarum Trail. However, page 115 states that “a recreational route of the Juan Bautista de Anza National Historic Trail follows the popular Skyline Trail which traverses the Puente-Chino Hills.” Please resolve this inconsistency in the text on page 89, as well as on the Trails, Bikeways and Scenic Highways map on page 87 (as well as other maps) which shows the Juan Bautista de Anza Trail as a “general historical” route north of the existing Skyline/Schabbarum Trail.

Response: The map on page 87 shows the official route of the national historic trail. Because the recreational routes overlap with other existing trails, they are not shown as part of the national historic trail on the Trails, Bikes, and Scenic Highways Map on page 87. The text on page 89 has been corrected in the errata for the draft study report/EA to reflect that the recreational trail is no longer in the planning phase.

Public Concern: Plant associations and communities should be described in addition to species.

Response: The errata for the draft study report/EA include corrections and additions to the vegetation description.

Public Concern: Coastal sage scrub is mentioned throughout the study without acknowledging a scientific debate about how scrub dominated by lemonade berry (*Rhus integrifolia*) or laurel sumac (*Malosma laurina*) should be classified.

Response: The study report relies on existing vegetation inventories and surveys conducted by federal, state, and local land management agencies that have documented locations for coastal sage scrub throughout the study area.

Public Concern: Writing for the public, the study should use common names rather than scientific names and botanical terminology.

Response: The draft study report/EA uses both scientific and common names. Scientific names are important to document because common names for species can differ.

Public Concern: The Native American groups described for the study should be corrected to include the two branches of the Gabrielino - the Tongva in the east and Los Angeles Basin, and the Fernandeno in the west, including the San Fernando Valley. The Tataviam lived more in the Santa Clarita Valley and north of the San Fernando Valley. Missing entirely are the Serrano, who lived throughout the San Gabriel Mountain range.

Response: Corrections to the description of Native American groups in the draft study report/EA have been included in the errata. A very brief description of the Serrano was included in the draft study report/EA on page 54, under the section, Other Native American Groups.

Public Concern: The subject of viticulture, wine, brandy, and fresh grapes were important from the time of Mission San Gabriel to Prohibition in 1920 and should be documented in the study. Products of the grape became supreme between the 1860s and 1886. Pierce's Disease killed most southland vineyards during the mid-1880s. Fruit and nut orchards were planted thereafter.

Response: Comment noted. The cultivation of vineyards is discussed on page 61 of the draft study report/EA under the section, Agriculture. The draft study report/EA errata acknowledges that this industry ended during the mid-1880s, primarily due to Pierson's disease.

Public Concern: On page 60, under Gold Mining, correct American discovery of gold to 1848.

Response: Page 60 acknowledges that the recognized American discovery of gold was in 1848. However, the study also acknowledges that gold was identified in Placerita Canyon in 1842.

Public Concern: Page 57 and 58 - There are two separate dates given for mission secularization: at the time of Mexican rule (1821, p. 57) and 1833 (p.58).

Response: The 1821 date refers to Mexican independence from Spain. The Secularization Act was passed in 1833.

Public Concern: Page 58, second column, second paragraph, clarify in which valley (San Gabriel?) sheep raising became an important industry.

Response: Raising sheep was an important industry in the San Gabriel Valley.

Public Concern: Prehistoric Landscapes - A listing of known Native American village sites within the study area could help to better define this section.

Response: The figure on page 54, Native American Groups in the Region, includes a listing of known Native American village sites within the study area.

Public Concern: In the discussion of recreation on pages 64-66 there is no discussion of the recreation resources of Santa Fe Dam and Whittier Narrows Dam Basins, including the development, acreage, or operation, and maintenance.

Response: Pages 64-66 describes historic recreation resources only. A description of the recreation resources associated with the Santa Fe Dam and Whittier Narrows Dam Basins is included on page 84. Additional information on these sites has been included in the errata for page 84 of the draft study report/EA.

Public Concern: The document fails to adequately address the Congressionally authorized purpose of Santa Fe Dam and Whittier Dam Basins.

Response: Errata for the draft study report/EA include the Congressionally authorized purpose of the Santa Fe Dam and Whittier Narrows Dam Basins.

Public Concern: The species tables in the Appendices contain errors in nomenclature. NPS should also verify that state and federal listings are current.

Response: The species tables have been corrected and updated in the errata for the draft study report/EA using the most recent state and federal listings, as of September 2012.

Public Concern: In Chapter 2, mention is made of the fact that Mt. San Antonio is also known as Mt. Baldy, yet in Appendix B of the Appendices section, the location of species mixes the usage. For example, the location of the “Laguna Mountains jewel flower” is given as both “Mt. Baldy” and “Mount San Antonio.” (p. 272) It should be noted that the “locations” indicated are said to refer to “U.S. Geological Survey topographic map quadrangle (USGS quad) names in most cases” (p. 277) Nevertheless, if Mt. Baldy and Mt. San Antonio are the same place, confusion is introduced by using them interchangeably or jointly.

Response: In the body of the draft study report/EA Mt. San Antonio is used exclusively. Only in the species tables which refer to location by USGS quad are the names Mt. Baldy and Mt. San Antonio both used. It should be noted that the USGS quad called Mt. Baldy includes the Mt. Baldy Village area. Mt. San Antonio peak is included in the USGS quad by that name.

Significance

Public concern: Some resources that were not identified in the draft study report /EA may be nationally significant including: 1) the development of orange and lemon groves, vineyards and wineries in the study area; and 2) significant sites in the Puente Hills associated with the Portola Expedition.

Response: The study found sufficient resource significance to meet the criteria for a recommendation to Congress. If the preferred alternative is implemented, further assessment of natural and cultural resources would be conducted.

Public concern: The significance of the river systems and waterways in the study area is overstated. These resources are similar to those found at other United States Forest Service (USFS) and Bureau of Land Management (BLM) sites.

Response: The NPS found that area’s unique geology and topographical conditions create river systems that are quite different from other national forests and BLM sites in California. San Gabriel Mountains river segments that remain free and flowing have been determined by the USFS to meet eligibility criteria for Wild and Scenic River designation. The highly erosive, steep slopes of the San Gabriel Mountains produce dynamic river systems with rich habitat such as alluvial fan sage scrub and riparian areas. These river systems contain some of the best remaining examples of alluvial fan sage scrub, and provide habitat for rare and sensitive species.

Public concern: The importance of freshwater fishes in the study area is overstated in the study.

Response: This finding is based on information provided in the Biodiversity Atlas, produced by the California Department of Fish and Game in 2003..

Public concern: The extensive amount of development in the study area south of the forest boundary seems to contradict a finding of significance.

Response: Within the study area, two areas were found to be nationally significant, the San Gabriel Mountains and the Puente-Chino Hills. Extensively developed areas were not found to be nationally significant (see Chapter 3 of the draft study report/EA).

Suitability

Public concern: The study area does not meet the standards of the NPS. The multiple land uses within the San Gabriel Mountains and Angeles National Forest is in conflict with NPS policies.

Response: While not all portions of the study area meet NPS criteria for a new park unit, the San Gabriel Mountains and Puente-Chino Hills were found to contain nationally significant resources which are suitable for inclusion in the national park system. Suitability analysis evaluates the uniqueness of natural and cultural resources relative to resources that are already protected in the NPS system.

Public Concern: The suitability findings were swayed to support the inclusion of the NPS.

Response: To be considered suitable for addition to the national park system, an area must represent a natural or cultural resource type that is not already adequately represented in the national park system, or is not comparably represented and protected for public enjoyment by other federal agencies; tribal, state, or local governments; or the private sector.

Based upon evaluation of the study area resources and their relative quality, character, and rarity, the National Park Service has determined that the San Gabriel Mountains and Puente-Chino Hills portions of the study area are suitable for inclusion in the national park system. Together, the two areas contain a combination of themes and resources not found in any national park unit or comparably managed area. If similar resources were already included in the NPS system, the study area would have been found unsuitable. For details about the basis for this conclusion, refer to Chapter 4, Suitability, in the draft study report/EA (pp. 123-148).

Need for NPS Management

Public Concern: More analysis is needed to demonstrate the NPS could provide superior management for the study area.

Response: The study determined that a collaborative or partnership-based management approach which includes a leadership role for the NPS is a superior management option for meeting the complex conservation and recreation needs of the study area. The NPS has the ability to work in a coordinated fashion, on a regional basis, to address the current lack of equitable access to open space and to protect significant resources. Existing land management agencies have specifically requested assistance from the NPS to address some of these issues (see draft study report/EA, p. 157). NPS management over other individual agencies is not proposed.

Study Process

Public Concern: There should be more collaboration between NPS and USFS on the study.

Response: The NPS worked in partnership with the Angeles National Forest on many aspects of the study, including resource evaluation and alternatives development.

Public Concern: Funding is being spent on planning rather than on-the-ground improvements in the study area.

Response: NPS was directed by Congress to complete the study. The funding allocated to the San Gabriel Watershed and Mountains Special Resource Study is small when compared to the on-the-ground needs that have been identified. If Congress were to implement the selected alternative, funding would be allocated toward specific management actions to protect the area's resources and to provide opportunities for public enjoyment.

Alternatives

Concerns Relating to the Range of Alternatives

Public Concern: None of the alternatives provide new authorities, funding, or resources to increase the effectiveness of ANF management.

Response: All of the action alternatives presented in the draft study report/EA included recommendations for new authorities and funding for the USFS (see pages 172-173, p. 176, and p.183), as does the selected alternative.

Public Concern: If legislation is introduced to enact any of the action alternatives, we believe it should include specific language that would: 1) protect local water supply, water quality and water rights; 2) protect and preserve all water and waste water facilities (both publicly and privately owned) within the designated area and exclude them from NPS or federal agency jurisdiction; 3) preserve facility access to waterways and rights of way for water and waste water facility maintenance and infrastructure improvement; 4) prevent NPS interference with flood control and maintenance activities; and 5) clearly delineate the lands which would fall within the national recreation area, to identify specific parcels of land, rather than a broad land designation.

Response: The study recognizes that the Los Angeles metropolitan region has highly complex systems of public infrastructure to transport and store local and regional water supplies. No alternative presented would change existing water rights, water supply operations, water treatment operations, flood protection efforts, or other agency functions necessary to maintaining public infrastructure essential for public health and safety.

All of the proposed alternatives, including the selected alternative, would retain existing water rights. Management of water supply and treatment plants would continue under current authorities. An NRA designation would not entail any new or future beneficial uses or requirements for water supply, water quality, or air quality regulations.

The broad land designations identified for alternatives evaluated in the study, if enacted by Congress, would not change land use or local regulatory authorities, but would define an area in which the NPS would be authorized to acquire land at some point in the future. NPS management policies would only apply to land acquired by the NPS. This study further recommends that any implementing legislation stipulate that water supply and transport infrastructure would continue to be operated and regulated by existing agencies and would not be affected by the NRA designation (draft study report/EA, p. 164).

Public Concern: None of the alternatives deal with the issues of public hunting, trapping, or fishing on land within the NRA.

Response: Under all of the alternatives evaluated in the draft study report/EA, the Angeles National Forest (ANF) would continue to be managed by the USFS. Hunting and trapping would continue to be permitted by the USFS and regulated by the California Department of Fish and Game. On lands outside of the ANF, hunting would only be restricted on lands acquired by the NPS. NPS land acquisition would be limited. For private lands and lands owned by other agencies or jurisdictions within an NRA, those entities that currently own or regulate such lands would also continue to determine whether or not hunting or trapping would be allowed. The alternatives evaluated in the study do not recommend specific prohibitions on fishing.

Public Concern: Alternatives C and D do not justify the role of the NPS or adequately explain problems with existing USFS management. Many of the proposed actions can be accomplished with partnerships rather than changing ANF management.

Response: All of the alternatives evaluated in the draft study report/EA would retain ANF management and emphasize partnerships. Public scoping and stakeholder involvement indicated that NPS assistance for collaborative management and regional planning, coordinated interpretation and education, and technical assistance for conservation and recreation planning could contribute to improving recreational opportunities and conservation of significant resources. Please refer to the Need for NPS Management section of the draft special resource study for more information on this topic (See draft study report/EA, p. 157).

Angeles National Forest management challenges are documented throughout the draft study report/EA. A summary of ANF challenges and demands is provided on page 94 of the draft study report/EA. Primary management challenges include increasing demands for recreation and reduced budgets for recreation, staffing, and facility maintenance.

Public Concern: An NPS NRA designation overlaying the Angeles National Forest would narrow its multiple use management to a recreation focus.

Response: In all of the alternatives evaluated, the U.S. Forest Service would continue to manage the ANF according to its multiple-use policies. An NRA designation would be a means to provide more guidance, tools, and support to improve recreational experiences and protect significant resources.

Public Concern: An overlay of a second federal agency designation on the Angeles National Forest (ANF) would be costly, inefficient, and would direct money to administration rather than to maintenance and operations.

Response: The selected alternative does not recommend an overlay or additional designation for the Angeles National Forest.

Public Concern: An NRA designation which creates a unit of the NPS system will lead to new restrictions. Comments expressed concern that existing recreation uses such as off-road vehicle use, recreational cabins in the ANF, mountain biking, equestrian use/packing stations, hunting and firearm possession, rock collecting, gold mining, and skiing could be jeopardized by an NRA designation. Other concerns included road closures, mining restrictions, tougher air quality standards, discontinuation of special uses such as races and filming, and restrictions on communications facilities and other infrastructure.

Response: An NRA designation would not prevent such uses on existing public lands. Existing land management agencies within the NRA alternatives would continue to determine what uses are appropriate in their respective jurisdictions. For example, the USFS would continue to determine

appropriate uses on ANF lands and manage according to its multiple-use policy. NPS management policies would only apply to lands acquired by the NPS.

Public Concern: In a partnership based NRA, how would partner disagreements be resolved?

Response: Partnership decisions would not be binding. Ultimately, each agency would be the decision-maker for its own jurisdiction.

Public Concern: Creating a San Gabriel NRA may be an unfunded mandate.

Response: State, local and private landowner/organization participation in the NRA would be voluntary. The study recommends NPS funding levels that would be needed for administration of alternative D.

Public Concern: Implementation of the alternatives could be costly. The federal government should not increase spending during a time of extreme deficit.

Response: The study identifies NPS funding needs associated with the selected alternative. If Congress were to authorize any of the study recommendations, actual funding would be determined by Congress within the broader federal budgetary process.

Public Concern: The alternatives do not address ANF issues associated with illegal immigration and the need for more fire funding.

Response: These issues are beyond the scope of the special resource study. The purpose of the study is to determine whether any portion of the San Gabriel Watershed and Mountains study area is eligible to be designated as a unit of the national park system.

Public Concern: The NRA designation may result in new user fees.

Response: Fees would remain under the jurisdiction of existing agencies. For example, the USFS would continue to collect fees for the Angeles National Forest. There are currently no entrance fees for NPS sites in the Santa Monica Mountains National Recreation Area (SMMNRA). However, there are fees for camping in the SMMNRA and special use permits for activities such as filming and special events on NPS-owned lands.

Public Concern: The proposed action alternatives do not do enough to increase environmental protection.

Response: The action alternatives and the selected alternative would increase environmental protection through increased education, law enforcement, restoration, and a framework for coordination of conservation efforts by multiple agencies and organizations.

Public Concern: The proposed action alternatives will lead to unnecessary development and commercialization including more concessions.

Response: Extensive development and commercialization is not recommended in any of the alternatives presented in the draft study report/EA. If Congress were to implement the study recommendations, a management plan would be developed to define management priorities and specific actions needed.

Public Concern: Cooperative management seems in contradiction with the NPS having a lead role.

Response: Under cooperative management, each agency would retain responsibility for its own decision-making. The lead role of the NPS would primarily involve coordination and administration of the partnership.

Public Concern: Reopening visitor centers in the Angeles National Forest should be a priority for a national recreation area.

Response: The selected alternative suggests that the NPS and USFS could collaborate on interpretive and educational opportunities, which could include opening visitor centers that are currently closed due to lack of funding or staffing availability.

Public Concern: The NPS has a less aggressive fire protection strategy than the USFS.

Response: The USFS would continue to manage fire protection on the Angeles National Forest. The NPS would be the lead on lands owned and managed by the NPS. Federal, state and local agencies regularly collaborate and work together on fire protection efforts.

Public Concern: There should be a unified fire protection response plan.

Response: Under all of the alternatives evaluated in the study, fire protection would remain the responsibility of existing federal, state, and local agencies (Los Angeles County, U.S. Forest Service, California Department of Forestry and Fire Protection). If the selected alternative were implemented, the NPS and partner agencies could work together to take a pro-active approach to coordinated resource management to reduce catastrophic fires (draft study report, p. 164).

Public Concern: Sanitation Districts of Los Angeles County's active landfills and other sanitation facilities should be removed from NRA proposals to avoid plans and permits that would impact the Sanitation Districts of Los Angeles County's mission.

Response: The Puente Hills Landfill is not included in the boundary of the selected alternative. None of the other sanitation facilities within the boundary of the selected alternative would have additional permitting requirements. The draft study report/EA recommends that any implementing legislation ensure that existing sanitation facilities and operations such as landfills

and water treatment plants, would not be affected by any resulting designation (see draft study report/EA, p. 164).

Alternative A Concerns

Public Concern: The USFS does not have the same resources and authorities that the NPS has to manage an NRA.

Response: Alternative A includes recommendations for additional funding, staffing, and authorities for the USFS to manage an NRA. The selected alternative makes similar recommendations that would provide for more effective management by the ANF without an NRA designation. Through use of the Service First Authority, the NPS and the USFS could share staff, funding, and coordinate on management efforts.

Public Concern: Alternative A should include plans for off-highway vehicle recreational development.

Response: The alternatives evaluated in the study are broad in nature and do not recommend specific actions for any type of recreational use. If alternative A, or any other alternative were implemented, the U.S. Forest Service could consider developing such a plan.

Alternative D Concerns

NRA Management Concerns (Alternative D)

Public Concern: The San Gabriel Region NRA (Alternative D) should prevent oil and gas development and strip mining.

Response: Designation of an NRA would not change or alter existing mineral rights. The laws and policies of existing agencies (including federal, state, and local governments) will continue to apply to management of mineral development (draft study report/EA, p. 164). NPS policies would only apply to land that NPS acquires.

Public Concern: Alternative D should emphasize preservation of the watershed including a management focus on waterways and creeks.

Response: Alternative D and the selected alternative include many of the same watershed-based recommendations as alternative C which recommends a river-based NRA that would raise the visibility of the San Gabriel watershed, new educational and interpretive opportunities along the river and throughout the watershed, and improved river-based recreation (see draft study report/EA, p. 175).

Public Concern: The NPS should fully engage the public into the management plan development process.

Response: If a national park unit is established, the NPS would prepare a management plan in collaboration with partner agencies, and with opportunities for public involvement.

Public Concern: Private property in the mountains should be protected.

Response: The draft study report/EA recommends that any legislation proposed to implement this study should specify that eminent domain would not be used for land acquisition within the NRA. The NPS would only consider acquiring land on a limited basis from willing sellers. Designation would not impact local land use authority over lands not owned by the NPS (draft study report/EA, p. 164).

Public Concern: The San Gabriel Region NRA should provide for improved security and law enforcement/rangers in the San Gabriel Mountains.

Response: Alternative D and the selected alternative recommend staffing which includes law enforcement park rangers. Through Service First or cooperative management agreements, the NPS and other partner agencies could share staff, facilities, and funding to assist in the operations and maintenance of heavily used visitor areas. For example, the NPS law enforcement rangers could supplement USFS staff in high use areas of the ANF.

Public Concern: There should be maximum role for the NPS within the formal NRA partnership.

Response: In alternative D and in the selected alternative, the NPS would take a lead role in coordinating partnership-based activities. Through cooperative management agreements, the NPS could also provide educational, interpretive, law enforcement and other services to partner agencies.

Public Concern: Ecological restoration and other resource management goals should be emphasized in the NRA proposed in alternative D. Specific suggestions included species re-introduction and a focus on enhancing ecological interconnectivity.

Response: Ecological restoration and resource management are key components of Alternative D and the selected alternative. If Congress were to designate an NRA, a management plan would be developed to define management priorities and specific actions related to resource management.

Public Concern: The NRA management in Alternative D should focus on controlling overcrowding and damage to the land from overuse.

Response: If Congress were to designate an NRA, a management plan would be developed to define management priorities and specific actions needed. The NPS and agency partners could work together to reduce crowding, improve visitor experience, and protect natural resources.

Public Concern: The NRA in alternative D should purchase privately owned cabins and rent them to the public or perhaps build more cabins.

Response: Under all of the alternatives evaluated in the study, the recreational cabin program on the Angeles National Forest would continue to be managed by the USFS.

Public Concern: The alternatives should state that if resource protection necessitates a recreational use and activity be discontinued, viable alternative locations for those same uses or activities must be provided so as not to diminish already limited recreational resources. Multiple-use including hikers, equestrians, trail runners, and cyclists should be the goal of any new trail project.

Response: If Congress were to implement the study recommendations, opportunities for more multiple-use trails and maintaining areas to accommodate a wide range of recreational users could be explored.

Public Concern: Additional agencies or organizations should be included in the NRA partnership including Wildlife Corridor Conservation Authority (WCCA), the Mountains and Recreation Conservation Authority (MRCA), and cities such as Whittier, the City of Los Angeles and others.

Response: The selected alternative identifies WCCA and MRCA among the potential NRA partners, and suggests that cities and communities could also be partners.

Public Concern: The NRA should work to control impacts from development and urbanization.

Response: Impacts from continued development and urbanization would continue to be addressed through the local government land use planning process under current jurisdictions (draft study report/EA, p. 164). However, if the selected alternative is implemented, partner agencies could work together to address the needs for open space in the San Gabriel region.

Public Concern: Alternative D should emphasize that existing uses will be maintained and local jurisdictions will maintain current roles and authority.

Response: All of the alternatives in the draft study as well as the selected alternative retain local land use and existing regulatory authorities as well as state and local laws and policies for lands that are not federally owned (draft study report/EA, p. 164). NPS management policies would only apply to lands that the NPS would acquire.

Public Concern: If the NRA is implemented, mitigation funds should be made available to other nearby USFS canyons that may also receive increased use such as Deep Creek, Mill Creek, Lytle Creek, and Cajon Wash.

Response: If Congress enacts the selected alternative, then comprehensive proactive planning to address the possibility of new recreational impacts would accompany development of specific

actions. This would include additional analysis of any potential impacts and identification of mitigation measures to address such impacts.

Public Concern: NPS should acquire small pieces of available land which to prevent development that could impact resources.

Response: If Congress were to implement the selected alternative, the NPS would be authorized to acquire lands from willing sellers (as funding permits) to protect significant resources or for operational purposes. The NPS would be directed to identify priority parcels for acquisition (through donation or purchase).

Public Concern: Local governments included in Alternative D should be offered an “opt out” opportunity.

Response: The designation of an NPS national recreation area would not establish additional regulatory or land use authorities over local governments (draft study report/EA, p. 164). All local government participation would be voluntary.

Public Concern: Alternative D should include language specifying that the administration and management of Recreation Residence Special Use Permits within the project area shall continue pursuant to established U.S. Forest Service Rules and Regulations.

Response: U.S. Forest Service management and ownership of existing Angeles National Forest lands would be maintained in all of the alternatives. U.S. Forest Service policies would continue to be applied to management of these lands (draft study report/EA, p. 164). This would include administration and management of forest special use permits.

Cultural Resources Concerns (Alternative D)

Public Concern: Alternative D should focus on identifying and interpreting important cultural resources.

Response: Each of the alternatives evaluated in the draft study report include recommendations for interpretive and educational programs. If Congress were to implement the selected alternative, specific programs would be developed through implementation planning.

NRA Boundary Concerns (Alternative D)

Public Concern: The boundaries of alternative D exceeded the authorized parameters of the study.

Response: Alternative D is primarily within the area Congress authorized the NPS to study. The San Gabriel River Watershed Study Act (PL 108-042, 2003) directed the National Park Service to

conduct a special resource study of 1) the San Gabriel River and its tributaries north of and including the city of Santa Fe Springs, and 2) the San Gabriel Mountains within the territory of the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC). A few small portions of the San Gabriel unit of the Angeles National Forest that fell outside the study boundary were included in the NRA alternatives evaluated in the study in order to make the NRA correspond to the forest boundary.

Public Concern: The boundaries of the NRA proposed in Alternative D should be expanded to include important related areas. Areas suggested include:

- The entire San Gabriel Mountain Range from SR-14 to I-15, including Ice House Canyon, Cucamonga Peak and Wilderness. Expansion would allow for better interpretation of the geologic significance of the San Gabriel Mountains.
- Connections to the Santa Susana and Santa Monica Mountains. Some comments suggested making the San Gabriel Region NRA contiguous with an expanded Santa Monica Mountains NRA including the Rim of the Valley Trail.
- Wildlife connection to the Castaic Mountains to facilitate protection of the corridor from urban encroachment.
- The lower San Gabriel River watershed (areas outside of the study area) including the estuary of the San Gabriel River, Los Cerritos wetlands, Seal Beach, and river corridors that run south of Whittier Narrows. The entire Puente-Chino Hills corridor to Chino Hills Park and/or the Cleveland National Forest including protection of the coastal sage scrub critical habitat, rare oak and walnut woodlands, and wildlife which rely on the broader corridor.
- Surrounding urban areas including entire cities along the river corridor and / or more San Gabriel Valley communities to provide access to recreation and open spaces. Specific suggestions included: a connection between San Gabriel River/Whittier Narrows and Puente; the Montebello Hills; Eagle Rock; Highland Park; Pasadena; and Sierra Madre Foothills
- The Santa Clara River drainage.
- The Coyote Hills including wildlife connections to the Puente Hills.
- The northern unit of the Angeles National Forest so this unit of the national forest would not become orphaned and inadequately funded.
- Broader areas in southern California including the San Bernardino National Forest, BLM lands, state parks, county wilderness parks, the Palomar Mountains, and the San Jacinto Mountain area.
- The Verdugo Mountains.
- The San Antonio Creek watershed.

Response: The alternative D NRA boundaries primarily include areas that were determined nationally significant and that meet feasibility criteria for stakeholder, landowner, and agency support. The boundaries of alternative D cannot extend beyond the area that Congress intended the NPS to study. However, alternatives C and D and the selected alternative, all allow the NPS to provide technical assistance to communities beyond proposed NRA boundaries for planning,

interpretation and education. Some of the areas suggested for an expanded alternative D NRA boundary are being addressed through the Rim of the Valley Corridor Special Resource Study (connections to the Santa Susana and Santa Monica Mountains).

Public Concern: The northern boundary of Alternative D should be moved south to the existing Angeles National Forest boundary.

Response: The selected alternative does not include the ANF or the areas north of the forest in the proposed NRA boundary.

Public Concern: The study offers no reason why developed areas that cannot contribute to the goal of improved recreation would be included in the NRA boundary.

Response: A half-mile corridor around the San Gabriel and Rio Hondo rivers, south to Santa Fe Springs was used as a proposed boundary in urban sections of the NRA boundary proposal because these areas are within a 10 minute walk to the rivers thus providing the potential for collaboration on providing close to home recreation opportunities, river access, and educational outreach.

Public Concern: If the study recommendations are not implemented, the NPS should consider a study to look at the Puente Hills, Coyote Hills, San Jose Hills and Santa Ana Canyon together.

Response: The NPS conducts special resource studies only as directed by Congress.

Staffing and Job Program Concerns (Alternative D)

Public Concern: Alternative D should include a robust jobs program and a strong volunteer program. The job program could be coordinated through school programs, religious and educational institutions, and educational organizations. Some commenters suggested that the job program be focused on youth and veterans, while others suggested that job programs enrollment should reflect the diversity of the region. Some suggested that this be part of a “Forest Conservation Corps” program or a “River Ranger Program.” Some commenters felt that volunteers could assist with trail work, docents for trail hikes leaders, trail restoration, interpreters, staff visitor centers, and assist in general maintenance of the area.

Response: Alternatives C and D and the selected alternative all include recommendations for volunteer programs, job training, and employment opportunities. If a designation is implemented by Congress, such opportunities and programs would be determined through further implementation and management planning.

Public Concern: Alternative D should provide more staffing for the management of recreational users.

Response: Alternative D and the selected alternative include recommendations for NPS staffing including park rangers and visitor use assistants. Alternative A recommends additional funding for USFS staff in the ANF.

Funding Concerns (Alternative D)

Public Concern: Adequate funding should be provided to properly achieve objectives of alternative D. However, the proposed NRA should not detract from funding from existing NPS sites or from current ANF funding. Funding priorities stated included personnel to coordinate volunteers, management of nonnative species. Some commenters discouraged funding to be used for new buildings or interpretive centers. Other commenters felt that the need for additional funding specifically for the ANF should be acknowledged.

Response: Funding requirements for NPS management have been identified in alternatives C and D and the selected alternative. All of the study alternatives, including the selected alternative recommend additional funding for the needs of the ANF.

Public Concern: Alternative D should include language to provide for public-private partnerships to leverage funding for the NRA.

Response: All of the alternatives evaluated in the study, including the selected alternative, recommend opportunities for leveraging funding through public-private partnerships.

Recreational Access and Opportunities Concerns (Alternative D)

Public Concern: Alternative D should include recommendations for improved accessibility to recreation areas, including public transit opportunities and improved accessibility for the disabled and the elderly. Specific recommendations included establishment of a transit to trails program, providing shuttles for visitors to the ANF or shuttles connecting downtown Los Angeles or other major transit linkages such as the Metro Gold Line, and working with partners to establish bus routes on weekends and holidays to enhance access, air quality, and the overall visitor experience.

Response: Alternatives C and D and the selected alternative all include recommendations for improved transportation to recreational area destinations and improving overall accessibility for the elderly and disabled. It should be noted that agencies are currently working to improve accessibility as is required by the Americans with Disabilities Act.

Public Concern: Alternative D should include recommendations for a network of parks and trails along the urban river corridors that would connect to the San Gabriel Mountains. Specific suggestions include trail networks along the urban river corridors and in the Puente Hills and a technical assistance program to provide more opportunities for protection open space and providing and healthy recreation opportunities.

Response: Alternative D and the selected alternative include recommendations for a technical assistance program to achieve a network of parks and open spaces that could include connections to the San Gabriel Mountains.

Public Concern: Alternative D should include more specific management recommendations related to recreation sites and opportunities. Specific recommendations included: 1) use of previously impacted sites for new recreational opportunities, and 2) better usage of recreation spaces in urban areas to take the pressure off of impacts to the ANF, 3) specifying opportunities for fishing, motorized recreation, bicycling, trail siting, and use of dirt roads for bikes, horses and hiking, 4) consideration of green streets with safe access to recreation areas, and 5) providing family recreation opportunities on the north side of the ANF.

Response: Site specific planning and evaluation of new recreational opportunities and uses would be determined through additional management planning if an NRA were established by Congress.

Public Concern: Not all communities or neighborhoods in the study area have adequate access to recreational opportunities. Alternative D should provide for equitable access to recreation sites consistent with NPS's Call to Action which states that the NPS should "fully represent our nation's ethnically and culturally diverse communities."

Response: Alternatives C and D and the selected alternative would seek to improve recreational access and opportunities in urban areas that are deficient in recreation and parking lands by offering assistance in planning for close-to-home recreational opportunities.

Other Designations Suggested in the Public Comments

Public Concern: Alternative D should include the establishment of additional wilderness areas and designation of new Wild and Scenic Rivers. Specific areas suggested for wilderness designation included Red Mountain, Red Rock Mountain, Fish Canyon, Condor Peak proposed Wilderness, Castaic proposed Wilderness additions, Cucamonga proposed Wilderness additions, and Sheep Mountain proposed Wilderness additions. Wild and Scenic River recommendations included Middle Fork Lytle Creek, the north, east, and west forks of the San Gabriel River, San Antonio Creek from the upper slopes of Mt. San Antonio, and rivers in the San Bernardino National Forest.

Response: Recommendations for wilderness establishment and designation of new Wild and Scenic Rivers are beyond the scope of the special resource study. Recommendations regarding

wilderness and Wild and Scenic Rivers on national forest system lands would be the decision of the USFS.

Public concern: The Mount Wilson Trail should be designated as a National Historic Trail due to its role in creating a nationally significant observatory.

Response: National Historic Trail establishment requires Congressional designation following completion of a trail feasibility study which would also need Congressional authorization.

Environmental Assessment

Public Concern: Some commenters felt that a complete EIS is needed because of potential large impacts to area landowners, economic activity, and public access. Other comments expressed concern that the impact analysis is too subjective for a study of this size and importance.

Response: The NPS analysis has not identified significant impacts to area landowners, economic activity, and public access due to completion of the study. The selected alternative primarily recommends partnership approaches and minimal amount of land acquisition by the NPS. The conclusion of this study has produced a Finding of No Significant Impact (FONSI) which supports that an EA is the sufficient level of analysis. Please refer to the FONSI for additional information.

Given the broad nature of the study, the impact analysis must also be broad, by necessity, and avoid speculation as to site-specific types of impacts. The outcome of the study will be a recommendation to Congress. Any actions implementing study recommendations would be subject to appropriate environmental analysis (See draft study report/EA, p. 201).

Public Concern: There is no discussion regarding greenhouse gases (GHG). In November 2007 and August 2008, the Ninth Circuit U.S. Court of Appeals ruled that a NEPA document must contain a detailed GHG analysis.

Response: Completion of the study does not itself affect greenhouse gas emissions, nor does it propose specific management actions which would affect greenhouse gas emissions therefore this topic was dismissed. The outcome of the study will be a recommendation to Congress. If Congress enacts the recommendations, then specific actions will be developed in a comprehensive planning process and new environmental analyses would be undertaken prior to implementation (See draft study report/EA, p. 201).

Effects on Recreation Use and Visitor Experience

Public Concern: The NPS should prepare a supplemental environmental assessment to adequately assess potential significant impacts to recreation, including ski areas and other special uses on the ANF that were not addressed in the current EA.

Response: The administration of ski area permits and other special uses would not change due to completion of this study or if Congress enacts the recommendations described in the study. In all alternatives presented in the study, U.S. Forest Service management and ownership of existing ANF lands would be maintained and U.S. Forest Service policies would continue to be applied to management of these lands (draft study report/EA, p. 164). This includes continued U.S. Forest Service management of recreational uses and special use permits. The selected alternative does not include a designation for the ANF. The study report has been revised to acknowledge that ski areas are the largest commercial providers of recreation on the ANF (see errata for the draft study report/EA).

Public Concern: Future NPS policy governing this area will potentially exclude hunting or fishing opportunities. The ability to support conservation through hunting and fishing licenses would cease if hunting and fishing are not allowed.

Response: For all of the alternatives considered in the study, including the selected alternative, existing land management agencies and private landowners, if enacted by Congress, would continue to determine which recreational activities are appropriate, including hunting, fishing, and trapping. Hunting and trapping on the Angeles National Forest would continue to be overseen by the U.S. Forest Service and the California Department of Fish and Game. NPS policies on hunting would apply only to lands acquired by the NPS. In the SMMNRA, hunting is not permitted on lands owned by the NPS. The alternatives evaluated in the study do not make any recommendations regarding fishing.

Public Concern: The study does not adequately explain how the alternatives would increase recreation or provide new water-based recreation opportunities. The action alternatives could lead to more traffic in areas that are already congested and create more overcrowded trails, especially on weekends.

Response: The study alternatives discuss general ways to improve and enhance recreational opportunities in the study area such as facility improvement, new trails, additional staff (rangers and interpreters), monitoring efforts, and cooperative planning. If the recommendations described in the study are enacted by Congress, specific recreational uses would continue to be determined by existing agencies according to their own policies and guidance.

Examples of approaches suggested to address recreational needs in the area include working collaboratively to foster new recreational opportunities that are compatible with maintaining watershed values, water supply, flood protection, habitat values, and quality visitor experiences.

The NPS and partner agencies could also explore opportunities to restore vacant or unused land in urban areas to provide new recreational opportunities close to where people live. If the selected alternative is enacted by Congress, a management plan would be developed to guide the NPS and partner agencies in considering recreation alternatives through a process that would include environmental analysis and public involvement opportunities.

Public Concern: The action alternatives will lead to more traffic in areas that are already congested and create more overcrowded trails, especially on weekends.

Response: All of the alternatives recommend planning efforts to better manage the current level of visitation and plan for the future so that the recreational use will be better dispersed among more locations in order to improve resource protection and the visitor experience.

Public Concern: The Recreation Residence Special Use Permits in the ANF are well managed and should not be changed. Recreation residences in San Gabriel Canyon, Big Santa Anita Canyon, Tujunga Canyon and elsewhere in ANF, represent historic and cultural values which may be threatened by an NPS NRA designation.

Response: Under all the alternatives evaluated, including the selected alternative, Recreation Residence Special Use Permits in the ANF would continue to be managed by the USFS.

Effects on Water Resources

Public Concern: Floodplain management impacts are not discussed, as required by Executive Order 11988, Floodplain Management.

Response: Given the broad nature of the study, the impact analysis must also be broad, by necessity, and avoid speculation as to site-specific types of impacts. No specific actions would be undertaken within a floodplain due to completion of this study therefore this topic was dismissed. The outcome of the study will be a recommendation to Congress. If Congress takes action, then new environmental analysis would be undertaken prior to specific implementation actions. The Los Angeles Department of Public Works and the Army Corps of Engineers would be active partners in any further planning or implementation actions that could affect floodplain management.

Public Concern: Increased recreation in the river corridor could impact water quality, water supply, and flood protection. There is concern that mitigation through visitor education and additional staff described in the impact analysis would not alleviate these issues. Particular concern was raised about impacts on sediment management efforts.

Response: If no action is taken, existing threats and impacts to area water resources would continue. These already existing factors are presented in the affected environment for the draft study report. Although a new emphasis on river-based recreation holds the potential for additional

impacts on water resources downstream, with appropriate applied management through education and outreach, additional staffing and law enforcement, and application of best management practices to mitigate nonpoint sources of sediment or other pollutants, adverse impacts would likely be minor. The abatement of impacts from recreation would be heavily dependent upon monitoring, education, and applied management (draft study report/EA, p. 243).

If Congress enacts the selected alternative, then comprehensive proactive regional planning to address the possibility of new recreational impacts would accompany development of specific actions. This would include additional analysis of any potential impacts to water supply and water quality during planning and implementation and would identify the most environmentally appropriate places for river-based recreation through consultation with water resource management entities.

Effects on Biological Resources

Public Concern: The study does not explain how wildlife would be protected while increasing recreation. Increased recreation could lead to biological impacts that were not adequately addressed.

Response: The action alternatives evaluated in the study include recommendations to enhance or improve the quality of recreational opportunities in the area. This may or may not result in an increase in visitation or recreation. The level of impact would depend on the specific actions proposed by subsequent planning. If the selected alternative is implemented, specific actions for implementation would be developed in a management plan, along with environmental analysis and public involvement, to guide the NPS and partner agencies in considering any recreation enhancements. Wildlife protection would be considered in any such implementation planning.

Public Concern: Increased recreational access to the mountains will increase the occurrence of human-caused wildfires resulting in impacts to biological resources.

Response: If Congress enacts the recommendations in this study, the potential for increased recreation opportunities, in areas where previous use has been light or non-existent, could result in a minor adverse effect on natural resources, including through human-caused wildfires. The level of impact would depend on the specific actions proposed by subsequent planning. This would be mitigated through visitor education programs, and monitoring (draft study report/EA, p. 247). In particular, monitoring and education about daily fire danger levels could target specific types of recreation. In the selected alternative, the NPS and partner agencies could work together to take a pro-active approach to coordinated resource management to reduce catastrophic fires.

Public Concern: The NPS cites reservoirs as the cause of Spineflower loss, dams as the cause of the decline of the Santa Ana sucker, and flood control and channelization as the cause of the decline of the least Bell's vireo. These characterizations give people the mistaken impression that these structures should not be maintained and kept operational for their many public health, water supply, and safety functions. Also, there is evidence that these outcomes are not the direct result of these factors.

Response: Threats to federal and state listed species are described to document the affected environment for such species for the environmental assessment. This information was compiled from existing sources of data on the various species. No alternative evaluated in the study would change existing water supply operations or flood protection infrastructure. The study recommends that any resulting legislation ensure that infrastructure designed for flood protection, storage and transport of water supplies, treatment of water and wastewater, and management of solid waste would be unaffected by the designation.

Public Concern: The alternatives need to address the implications of mortality sink characteristics of the wildlife corridors recommended in Alternative D.

Response: A mortality sink is habitat in which reproduction is insufficient to balance local mortality. The alternatives in the draft study propose inter-agency coordination to protect and enhance the function of corridors.

Socioeconomic Effects

Public Concern: The study should include more information about regional economic benefits of recreation; restoration programs; and impacts on property values. In addition, the subsection on Environmental Justice should include more background information on the federal requirements regarding environmental justice, as well as data pertaining to minority and low-income populations within the study area.

Response: The economic benefits of special designations, including national parks, are documented on pages 228-229 of the draft study report. Although more recent information on the benefit of national parks in California and southern California have been made available since publication (2009 data versus 2008) the differences would not change the likely effects of the national recreation area designations evaluated in the draft study report.

Additional information has been provided in the errata for the draft study report regarding environmental justice and minority and low-income populations within the study area.

Public Concern: Designation of an NRA would preclude mineral exploration and mining as it would be incompatible with the NPS mission leading to tremendous economic impacts. The study area contains some potentially high value and strategically important mineral resources, as well as sources of aggregate material important to local development and public works.

Response: Under all alternatives, the USFS, BLM, private landowners, and other agencies, would continue to be responsible for decisions about mineral rights and exploration on lands which they manage. NPS policies about mineral rights would only apply to lands that the NPS owns (2006 NPS Management Policies, section 8.7). If the recommendation for designation were enacted by Congress, the NPS would only acquire lands (and any associated mineral rights if applicable) on a limited basis from willing sellers (See also “Retention of Local Land Use and Existing Regulatory Authorities,” draft study report/EA, p. 164).

Effects on Regulatory Agencies, Local Jurisdictions, Land Use, and Private Property

Regulatory Agencies, Local Jurisdictions, and Land Use

Public Concern: Involvement of the NPS and an NRA designation could increase regulatory controls impacting existing agencies and jurisdictions. Specific concerns included increased federal government control over local government, an expansion of agencies responsible for land use planning, and concern that a new designation would allow non-government organizations to influence local land use decisions.

Response: If enacted by Congress, the designation of an NPS NRA would not establish additional regulatory or land use authorities over existing agencies and local governments. NPS management policies would only apply to land acquired by the NPS.

Public Concern: An NRA designation would impact the ability of state and federal agencies to build new facilities and infrastructure including communication towers, utilities, and transportation improvements.

Response: If enacted by Congress, the designation of a NPS NRA would not establish additional regulatory or land use authorities over other state and federal agencies and local governments. NPS land management policies and regulations would only apply to lands that the NPS acquires. The NPS would only consider acquiring land on a limited basis from willing sellers. In addition, no alternative presented would change existing water rights, water supply operations, water treatment operations, flood protection efforts, or other agency functions necessary to maintaining public infrastructure essential for public health and safety (draft study report/EA, p. 164).

Public Concern: Increased visitor use of infrastructure maintained by non-federal agencies, including county roads on the Angeles National Forest, would require additional maintenance and spending by those agencies not accounted for in the impact analysis.

Response: If the study recommendations were enacted by Congress, subsequent implementation plans and actions would address road usage and maintenance needs. The level of use of roads in the Angeles National Forest (ANF) is already high due to existing visitation levels. Substantial increases are not anticipated as a result of any of the alternatives proposed in the draft study report/EA. The selected alternative recommends exploration of alternative transportation options to the ANF which has the potential to reduce visitor use of roads.

Public Concern: Agencies providing flood protection, water storage and conveyance, and sanitation functions expressed concern that under an NRA, the ability of state and federal agencies to build new flood control, water supply, and wastewater systems and facilities could be limited by additional regulation.

Response: The study recognizes that the Los Angeles metropolitan region has highly complex systems of public infrastructure to protect the region from flood damage and for the transport and storage of local and regional water supplies. In addition, numerous facilities are necessary to treat wastewater and manage solid waste. None of the alternatives would change existing water rights, water supply operations, water treatment operations, flood protection efforts, or other agency functions necessary to maintaining public infrastructure essential for public health and safety if enacted by Congress. In all alternatives considered in the study, the USFS would continue to issue special use authorizations and permits related to public infrastructure on the Angeles National Forest.

All of the proposed alternatives, including the selected alternative, propose retention of existing water rights. Management of water supply and treatment plants would continue under current authorities. An NRA designation would not entail any new or future beneficial uses or requirements for water supply, water quality, or air quality regulations. NPS management policies would only apply to land acquired by the NPS. This study recommends that any implementing legislation ensure that existing sanitation facilities and operations such as landfills and water treatment plants, would continue to be operated and regulated by existing agencies and would not be affected by the NRA designation (draft study report/EA, p. 164).

Public Concern: The California Department of Fish and Game (CDFG) expressed concern that it could lose regulatory authority on lands acquired by the NPS, limiting their ability to freely access, monitor, or manage wildlife populations, particularly where mechanized travel is necessary to facilitate wildlife management objectives.

Response: If the recommendations of this study were enacted by Congress, NPS regulatory authority within an NRA would only apply to lands that the NPS would acquire. The need for land

acquisition by the NPS would be small, targeted for protection of significant resources, and subject to available funding.

For lands that the NPS would acquire and manage, NPS management policies direct the NPS to:

- cooperate with other agencies to ensure that the delineation of critical habitat, essential habitat, and/or recovery areas on park-managed lands provides needed conservation benefits to the total recovery efforts being conducted by all the participating agencies;
- cooperate with other agencies, states, and private entities to promote candidate conservation agreements aimed at precluding the need to list species;
- determine all management actions for the protection and perpetuation of federally, state, or locally listed species through the park management planning process, including consultation with lead federal and state agencies as appropriate (2006 NPS Management Policies, section 4.4.23).

The Santa Monica Mountains NRA has a long history of cooperation with the California Department of Fish and Game to protect resources, including adherence to local and state regulations. This includes coordinating with CDFG for environmental review and permitting, as well as entering into agreements and memoranda of understanding when necessary. This type of cooperation and coordination would continue within the San Gabriel unit if Congress were to implement the selected alternative.

Public Concern: The San Gabriel Valley Mosquito and Vector Control District is concerned that property owned/managed by NPS would be outside the jurisdiction of any vector control agency; this may substantially impact public health of residents in areas near NPS land. A further concern is that wildlife corridor protection efforts may not consider potential risks from increased human-wildlife interactions to both human and animal health.

Response: NPS Management Policies require that the NPS work to identify public health issues and disease transmission potential in the parks and to conduct park operations in ways that reduce or eliminate these hazards. The NPS public health program uses the consultation services of commissioned officers of the U.S. Public Health Service (2006 NPS Management Policies, 8.2.5.5, Public Health Program). The NPS generally coordinates with local agencies such as the San Gabriel Mosquito and Vector Control District. Were the study recommendations to be implemented by Congress, the NPS would manage vegetation for any lands which it acquires.

Protection of wildlife corridors would be conducted through implementation planning in cooperation with existing agencies and organizations and with opportunities for public input.

Public Concern: Class I air standards for a national recreation area will have a negative impact on private industry in the study area and could impair the ability of the Sanitation Districts of Los Angeles' ability to provide the essential public services to their customers.

Response: Only a small number of national park units are considered Class 1 airsheds under the Clean Air Act. Class 1 air standards only apply to NPS areas over 6,000 acres that were in existence beginning in August 1977. The San Gabriel Wilderness Area in the Angeles National Forest is an existing Class 1 area. The selected alternative does not recommend designations for areas that meet these criteria. Designation of an NRA, if enacted by Congress, would not impose additional air quality regulations on local industry. However, the NPS would minimize air pollution emissions associated with NPS park operations. The NPS, along with other affected land managers and public and private landowners, would have the option of commenting on new source permit applications and local air pollution control plans.

Private Property Rights

Public Concern: NPS might acquire land from unwilling sellers through eminent domain. Landowners may not be fairly compensated if land is acquired. Related comments include:

NPS designation should not be applied without the consent of property owners.

Language prohibiting acquisition by eminent domain and protecting private property rights should be included in any legislation resulting from the study.

Change in ownership from private land to public land will reduce property tax revenue which will affect local services and lead to higher property taxes for others.

Road access and road maintenance will be impacted, affecting protection and enjoyment of private property.

Response: The alternatives recommend that any legislation proposed to implement the recommendations in this study should specify that eminent domain would not be used for NPS land acquisition. The NPS would only consider acquiring land on a limited basis from willing sellers. Designation would not impact local land use authority over lands not owned by the NPS (see draft study report/EA, p. 164). The ANF would continue to be managed by the USFS under all of the alternatives evaluated in the report. No change in ownership, regulations or land use would be imposed by designating an NRA.