

Rim of the Valley Corridor Special Resource Study & Environmental Assessment

Summary of Public Comments and Response
November 2015

Prepared by the Pacific West Regional Office
Park Planning and Environmental Compliance
San Francisco, CA
National Park Service

U.S. Department of the Interior
Washington, D.C.

Table of Contents

I. Introduction	1
About this Document.....	1
Background.....	1
II. Overview of Public Involvement.....	2
Public Meetings	2
Publicity / Press	3
Public Comments.....	3
III. Summary of Comments Received	4
Acronyms	4
Study Process.....	4
Related Plans and Studies.....	5
Resource Description.....	5
Study Analyses.....	6
Alternatives.....	8
Environmental Assessment	16
IV. Response to Substantive Comments on the Draft Rim of the Valley Corridor Special Resource Study / Environmental Assessment.....	18
Resource Description.....	18
New National Park Unit Criteria Analysis	24
Boundary Adjustment Criteria Analysis.....	26
Study Process.....	27
Alternatives.....	28
Other Designations Suggested in the Public Comments	34
Environmental Assessment	35
Consultation and Coordination	42
Appendix A: List of Agencies and Organizations Commenting	44
Appendix B: Comments with Recommendations for Future Legislation that Would Expand Santa Monica Mountains National Recreation Area.....	48

I. Introduction

About this Document

The following document includes: 1) an overview of public involvement efforts related to the *Rim of the Valley Corridor Draft Special Resource Study and Environmental Assessment* (draft study/EA); 2) a summary of comments raised by the public on the draft study/EA; and 3) NPS responses to comments. In accordance with the National Environmental Policy Act and NPS policies, the combination of this document with the draft study/EA, *Errata* for the draft study/EA, and *Finding of No Significant Impact* (November 2015) constitute the final *Rim of the Valley Corridor Special Resource Study*.

Background

The NPS prepared the April 2015 *Rim of the Valley Corridor Draft Special Resource Study and Environmental Assessment* to evaluate: (1) the suitability and feasibility of designating all or a portion of the area known as the Rim of the Valley Corridor as a unit of Santa Monica Mountains National Recreation Area (SMMNRA); and (2) the methods and means for the protection and interpretation of this corridor by the National Park Service, other federal, state, or local government entities or private or non-governmental organizations.

The study area covers approximately 650,000 acres in the southern California region. It includes SMMNRA (approximately 153,000 acres) and approximately 180,000 acres of lands managed by the U.S. Forest Service (the Angeles National Forest and the recently established San Gabriel Mountains National Monument). Similar to SMMNRA, numerous agencies and conservation organizations manage lands within the study area. Portions of at least 27 communities are located in the study area, with approximately 5.1 million people living in the study area, and another 13 million living in surrounding communities within the greater Los Angeles metropolitan region. Land use is diverse and includes large natural areas, parks and recreation areas, suburban communities, farms and ranches, highly urbanized areas, freeways, and an array of public infrastructure.

Through the study process, the NPS found that many of the significant resources within the study area augment the national significance of SMMNRA and provide habitat connectivity essential for long-term preservation of biodiversity in the Santa Monica Mountains. A boundary addition to SMMNRA was found as the most feasible option for protection and management of the area's significant resources.

Four alternatives were evaluated in the draft special resource study and environmental assessment.

- Alternative A: Continuation of Current Management (No Action), served as a baseline for evaluating the action alternatives;
- Alternative B: Cooperative Conservation Partnership would foster cooperative planning and funding tools for the NPS, partner agencies and landowners in the Rim of the Valley Corridor and key habitat linkages to the Los Padres and Angeles national forests (no new areas would be added to SMMNRA);
- Alternative C: Rim of the Valley Boundary Adjustment (NPS preferred alternative), an approximately 173,000-acre addition to SMMNRA that would provide more parks and protect habitat linkages, with an emphasis on creating more recreational opportunities near urban areas; and
- Alternative D: Regional Rim of the Valley Boundary Adjustment and Cooperative Conservation Areas, an approximately 313,000 acre addition to SMMNRA with an emphasis on protecting regional wildlife corridors, would add most areas within Rim of the Valley Corridor (excluding U.S. Forest Service managed areas) to SMMNRA. Cooperative conservation approaches would also be recommended for key habitat linkages between the Rim of the Valley Corridor study area and the Los Padres and Angeles national forests.

II. Overview of Public Involvement

The National Park Service (NPS) released the *Rim of the Valley Corridor Draft Special Resource Study and Environmental Assessment* (draft study/EA) in April 2015. The NPS mailed over 1,800 copies of newsletters that contained the executive summary of the draft study/EA and information about public meetings and ways to comment. Over 270 copies of the draft study/EA were sent to agencies and elected officials, as well as individuals and organizations that requested copies. An electronic newsletter was sent to over 2,500 individuals via e-mail. The NPS also made electric copies of the draft study/EA on the study website: www.nps.gov/pwro/rimofthevalley. The public comment period extended from April 14, 2015 to June 30, 2015. The NPS received approximately 1,800 comment letters about the draft study/EA from federal, state and local agencies and organizations, many individuals, diverse groups, and several letter writing campaigns.

Public Meetings

The NPS conducted an online meeting via the internet after the release of the study in April, using web conferencing technology. Using this technology, the NPS gave a presentation describing the findings of the study and the alternatives, followed by a question and answer session. Participants were encouraged to submit written comments and were directed to the study website where the various methods for commenting were outlined. The NPS also held five public meetings in May and June 2015 at locations throughout the study area. At each meeting, the NPS 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 NPS, view posters showing the alternatives, and make comments which were recorded on flip charts. The meetings were facilitated by NPS staff from the NPS Pacific West Regional Office and Santa Monica Mountains National Recreation Area staff. The meetings were attended by approximately 280 participants.

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

Location	Date and Time	Participants
Virtual (Online)	April 21, 2015, 12:30 p.m.	34
La Crescenta	May 4, 2015, 7:00 p.m.	45
Newhall	May 5, 2015, 7:00 p.m.	26
Thousand Oaks	May 6, 2015, 7:00 p.m.	53
Chatsworth	May 21, 2015, 7:00 p.m.	82
Downtown Los Angeles	June 2, 2015, 3:00 p.m.	40
TOTAL		280

Publicity / Press

A press release announcing completion of the draft study/EA and a series of public meetings was sent to approximately 230 media contacts in southern California on April 14, 2015. From that time until the public comment period closed on June 30, 2015, media coverage about the draft study/EA included articles in several local and regional newspapers, including the Los Angeles Times, Ventura County Star, LA Daily News, and San Gabriel Valley Tribune; additionally, an Associated Press (AP) article was published in newspapers around California. There were also posts about the draft study/EA in a variety of internet blogs associated with recreation, the environment, politics, communities, or business. Other media coverage included stories broadcast on community radio stations.

Public Comments

The NPS received approximately 1,800 comments from individuals, agencies, elected officials, and organizations. Approximately 75% of the 1,800 comment letters received were submitted as a result of several organized campaigns. Most comments were submitted via written letters and email. There were approximately 360 unique comment letters and over 1,350 form letters of five different types, a few of which had multiple variations. Campaigns organized by the National Parks Conservation Association and the Rim of the Valley Coalition accounted for the majority of the campaign comments submitted. The comments also include notes from the small group discussions held at each public meeting.

The NPS received comments from nearly 130 agencies, local governments, private businesses and organizations. Comments were also received from 12 elected officials, including a congressional delegation letter submitted by seven members of Congress. Appendix A includes a list of agencies and organizations that submitted written comments on the draft report.

III. Summary of Comments Received

The comments on the *Rim of the Valley Corridor Draft Special Resource Study and Environmental Assessment* (draft study/EA) covered a broad range of concerns. The majority of the comments were either directly related to the study alternatives or the potential impacts associated with the alternatives. The comments were entered into the National Park Service (NPS) Planning Environment and Public Comment (PEPC) database and analyzed. The following summary represents the full range of comments the NPS received. NPS responses to substantive comments are provided in Section IV of this document, “Response to Substantive Comments on the *Rim of the Valley Corridor Draft Special Resource Study and Environmental Assessment*.” A definition of the types of comments that are considered substantive is also provided in this section. The NPS has also provided responses to some comments that were non substantive to provide rationales for why a comment the comment was non substantive or to provide further clarification about specific concerns that fell outside the scope of the special resource study.

Acronyms

The following acronyms are commonly used throughout the comment summary:

- ANF – Angeles National Forest
- EA - Environmental Assessment
- MWD – Metropolitan Water District of Southern California
- MRCA - Mountains Recreation and Conservation Authority
- NPS – National Park Service
- SMMC - Santa Monica Mountains Conservancy
- SMMNRA – Santa Monica Mountains National Recreation Area
- SSFL - Santa Susana Field Laboratory
- USFS – U.S. Forest Service

Study Process

Comments regarding the study process primarily pertained to the study purpose, timeline, outreach, public materials, and the identification of the preferred alternative.

Some commenters noted the importance of the purpose and need of the study for understanding the study analysis and alternatives. Several expressed general support for exploring more options for resource protection and public enjoyment of the Rim of the Valley Corridor. Others believed that the inclusion of privately owned land and river corridors in the study area conflicted with the legislative history, study authorization, or NPS management policies. Some commenters noted that the relationship between the Rim of the Valley Corridor Special Resource Study and the San Gabriel Watershed and Mountains Special Resource Study was difficult to understand, particularly with the recent designation of the San Gabriel Mountains National Monument. Other commenters expressed concerns about length of the study process timeline and the potential loss of resource protection opportunities in the short term.

Some commenters expressed appreciation for the online, virtual public meeting format and for the structure of the in-person public meetings. Some commenters suggested additional outreach methods, such as posting recordings of NPS staff discussing the study in online videos. Others expressed concern that specific audiences were not aware of the study; still others noted that misinformation about the study was being shared among stakeholders. Specific contacts and local experts to include in the process were also identified by commenters, such as the Santa Ynez Band of Chumash Mission Indians, City of Los Angeles Neighborhood Councils, and

conservation groups. A desire to ensure compliance with Equal Justice Protections under Title VI and its regulations was also expressed via public comments.

Some individuals who reviewed the draft study materials believed they were difficult to understand and in some cases, lacking in detail. Others expressed a desire to see more brief documents that would further distill the study information to make it easier for audiences to understand.

Other comments about the study process focused on the inclusion of a preferred alternative and a desire by some to have more information about why Alternative C was identified as such.

Related Plans and Studies

Several commenters identified planning efforts and projects in the study area that relate to the draft study/EA. Some of these comments related to updates about related plans and studies already identified in the draft study/EA, while others mentioned newer, more recent efforts, such as the acquisition of a Browns Canyon parcel near Chatsworth by the Los Angeles County Department of Parks and Recreation. Some commenters suggested that the study should consider related plans such as proposed subdivisions and the proposed alignment of the California high-speed rail project.

Some agencies provided comments describing how the draft study findings and alternatives are consistent with their own existing plans and policies, such as the *Ventura County General Plan*. Private landowners, including some oil, gas, and farming businesses, also shared information about their plans and projects in the study area and how it related to the alternatives.

Others expressed concern about how the Rim of the Valley Corridor Special Resource Study and any resulting implementation could affect existing planning and project efforts, including the *SMMNRA Interagency Trail Management Plan* and approved development plans.

Resource Description

Comments on the resource description (Chapter 2) primarily included suggestions for technical corrections and additional information to be included in the study. Where appropriate, these have been added to the *Errata* to the draft study/EA.

Natural Resources

Geologic Resources. Most of the comments on this section were suggestions for adding more information to the description of petroleum resources in the area, particularly with regard to active oil wells today. One commenter also provided a number of technical corrections and additional information on the geologic resource description and map, and suggested that some topics could be explained in greater detail.

Water Resources. Comments on the water resources section primarily included technical corrections and additional information. Questions were raised regarding the description of major watersheds in the study area. Commenters also expressed their support for the preservation of riparian areas and restoration of the Los Angeles River, including expansion of actions on Los Angeles River tributaries. The Metropolitan Water District of Southern California commented that its some of its facilities within the study area were not included in this section of the draft study/EA.

Vegetation and Wildlife. Comments on vegetation and wildlife primarily expressed support for the preservation of habitat corridors and protection of natural resources. Comments on vegetation and wildlife also included

suggestions for additional information and corrections to descriptions of vegetation, habitat, and special status species. One comment requested that more detailed information be provided on special status species sightings.

Cultural Resources

Comments on cultural resources requested clarification on historical dates and activities and associations of Native American groups. Some commenters provided additional information on historical sites related to Asian-Pacific Islander Americans. One commenter felt that the historical importance of grape and wine production to the region should be addressed in the historic context. Some commenters noted that the effects of the 1959 Sodium Reactor Experiment accident as stated in the document has been corrected by more recent analysis.

Additional information and clarifications about the Tataviam was provided by the Fernandeano Tataviam Band of Mission Indians. The Santa Ynez Band of Chumash Indians also submitted a letter indicating that the Burro Flats Painted Cave is considered a sacred site under Executive Order 13007. Additionally, the letter contained additional information about the cultural significance of this site and the broader Santa Susana Field Laboratory property in the Simi Hills to the Chumash and other surrounding tribes. The letter further stated that the cultural significance of the site makes it eligible for designation as a national monument. One commenter stated that the Santa Susana Field Laboratory site and the broader area which encompasses Bell Canyon, Dayton Canyon, and Woolsey Canyon are considered a discontinuous archaeological district that has an overlapping area of historic and genetic interest to the Ventureño Chumash, the Tataviam, and the Gabrielino tribes.

Recreational Resources

Topics of concern related to recreation were identified. Several commenters noted that accessibility to trails and recreational opportunities, including public transit and trail connections, is a key issue and should be considered in implementation. Others commented that crowding at existing recreation and trail sites affects accessibility.

Many individuals commented on the topic of trails and trail use. Generally, there was support for continued and expanded use of trails for a variety of non-motorized uses including mountain biking and equestrian use, including in areas where these uses are currently restricted by existing agency policies. Trail connectivity was also noted as an important goal throughout the study area, and many supported the implementation of the Rim of the Valley Trail as a long distance trail. Some expressed concerns about the planned trail route (from the 1990 master plan) and whether it is still feasible given existing conditions today. Of specific concern were existing land uses adjacent to the planned Rim of the Valley trail route that might be incompatible with recreation, such as aggregate mining and oil and gas extraction operations. In these cases, commenters suggested identifying different alignments for the Rim of the Valley Trail. Others expressed concerns about trail use trespass onto private property.

There were also a range of comments expressing interest in expanding general and specific educational, outreach, and interpretive opportunities.

Study Analyses

Some commenters affirmed their support of the study findings. As mentioned above, some local agencies identified consistency between their goals and policies and the study findings and alternatives. Other commenters disagreed with the analyses. Some responded specifically to the new national park criteria analysis or boundary adjustment criteria analysis, while others provided general comments about topics such as feasibility more broadly.

New National Park Unit Criteria Analysis

Significance

The majority of comments that the NPS received about significance expressed support and agreement with the study findings for national significance. Some provided general statements of disagreement regarding resource significance for areas outside of the Santa Monica Mountains and the San Gabriel Mountains.

Suitability

There were a small number of comments regarding the suitability of the study area for inclusion as a new unit of the national park system. Those who did comment on this criterion generally concurred that there are significant resources in the study area that not currently represented in the national park system.

Feasibility

Some commenters questioned the feasibility of implementing the action alternatives, given the current government deficit and economic conditions. Some commenters objected to federal spending for land acquisition in particular, noting the difficulty in caring for existing federal lands, as evidenced by the NPS maintenance backlog. Others noted that although the cost of land acquisition in the area could be prohibitive, there might be limited opportunities to obtain land through donation and transfer from other public agencies. Other comments expressed concern that funding for a new national recreation area would be taken from other national parks, SMMNRA's current operations, or from the ANF.

Several people provided comments regarding the feasibility of NPS management of significant resources, public recreation, and access at the Santa Susana Field Laboratory site based on contamination issues. There were a variety of opinions regarding the appropriate clean-up standard that should be achieved prior to making the site available for public recreation. Other commenters expressed concerns that any NPS involvement in managing the site prior to cleanup could impede planned cleanup efforts.

Several agencies and organizations stated that specific land uses were not described adequately in the draft study/EA. Other comments requested that additional information regarding water and power transmission facilities, designated utility corridors, and potential high speed rail alignments be included in the land use description.

Other Comments

The Santa Ynez Band of Chumash Indians provided information about the cultural significance of the Burro Flats Painted Cave site and the broader Santa Susana Field Laboratory property in the Simi Hills. Also provided was additional analysis regarding how this area would meet NPS criteria for a new national park unit, with specific regard to a separate national monument designation.

Need for NPS Management

A large number of comments supported the need for NPS management in the study area, with commenters expressing general support for expanded NPS roles and resources in the area. Expertise and assistance that commenters thought the NPS could provide included overall guidance, management of special status species, education and outreach programs, funding strategies, and experience with partnerships and collaborative management.

Other commenters expressed their belief that there was not a need for NPS involvement or additional government involvement and that an overlay by another government agency would be costly, inefficient, and would direct money to administrative costs rather than to maintenance and operations.

Boundary Adjustment Evaluation

Protection of Significant Resources or Opportunities to Enhance Public Enjoyment Related to the Purpose of SMMNRA

Many commenters expressed concurrence that a boundary adjustment to SMMNRA would provide opportunities to protect significant resources and enhance public enjoyment. A frequent theme was support for enhancing habitat and wildlife movement connections.

Some commenters questioned whether lands used for agricultural, mineral, residential and commercial land uses on private property are compatible with NPS park purposes. One commenter was also concerned that the study did not identify which privately owned properties within the study area contain resources of national significance that should be federally protected. Several commenters questioned whether a boundary expansion was necessary, citing the similarity of the natural and cultural resources in the study area to those in the San Gabriel Mountains National Monument.

Feasibility to Administer Lands Added through the Boundary Adjustment

Comments regarding feasibility of a boundary adjustment to SMMNRA were similar to those expressed regarding the feasibility analysis for the new national park. Representatives of the oil and gas industry also questioned whether their operations were compatible with the national park service criteria for a boundary adjustment.

Alternatives

Overall Summary

Most of the comments received were about the study alternatives. The majority of comments supported a boundary adjustment to the Santa Monica Mountains National Recreation Area with most commenters preferring Alternative D: Regional Rim of the Valley Boundary Adjustment with Cooperative Conservation Areas. These commenters expressed a desire for NPS involvement in conservation efforts over the broadest geographic area. Many commenters thought that Alternative D would provide greater protection of biological resources including wildlife corridors and the most potential for expansion of recreational opportunities and visitor services. Commenters that supported Alternative C: Rim of the Valley Boundary Adjustment (Preferred Alternative) liked the urban focus of this alternative and the focus on areas with the greatest need for new recreational opportunities and open space. Other supporters of Alternative C described this alternative as more likely to be implemented with limited NPS resources. Some commenters suggested a hybrid boundary adjustment where areas considered in Alternative D would be added to the Alternative C boundary adjustment proposal.

Approximately 2% of commenters supported Alternative A: 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 on private landowners. Others were concerned about the cost and feasibility of implementing the action alternatives. Support for Alternative B: Cooperative Conservation Area, was slight, with those who preferred it primarily citing the ability of the NPS to provide assistance without oversight as a reason for support.

There were also several comments that applied generally to the alternatives. Some commenters expressed general support for new NPS management roles without identifying their preference for a specific alternative. Several also expressed general support for additional resource protection and expanded recreational

opportunities in the study area.

Concerns about the boundary adjustment alternatives generally was focused on the potential effects on land use, including agricultural, oil and gas, aggregate mining, public utilities and related infrastructure. Other commenters were concerned about the possibility of any potential effects on private property rights, mineral rights, and/or water rights. Still others expressed concern that a boundary adjustment could affect certain recreational uses, such as rock hounding, recreational mining, hang gliding, or recreational target shooting.

The following section begins with comments on actions common to all alternatives, followed by comments on each alternative, including suggested changes.

Actions Common to All Alternatives

The draft study/EA described a series of actions common to all alternatives. Such actions acknowledged that under all alternatives local land use control, regulatory authorities, and water rights would generally be retained and that private property rights would not be affected. Within the public comments received, several agencies, utilities, water districts, and oil and gas industry representatives requested that specific language be added regarding public infrastructure, utilities, and mineral rights (*Appendix B: Comments with Recommendations for Future Legislation that Would Expand Santa Monica Mountains National Recreation Area*).

Continuation of Current Management (No Action Alternative)

Preference for No Action

Approximately 2% of commenters who expressed an alternative preference preferred the No Action Alternative. Many of these comments expressed concern about potential restrictions on activities on private land. Oil and gas production, aggregate mining, grazing, and development were called out as activities of particular concern. Some commenters were also concerned that cities and other local jurisdictions might use cooperative conservation area boundaries and national recreation area boundaries to justify additional regulations on private landowners. A few comments were concerned that additional recreational use in the area could increase trespassing on private lands and cause wildfires. Some commenters who supported the No Action Alternative were concerned that there is not enough federal budget or resources to support an expansion or further work in the area. One commenter noted that proposed partner agencies are also underfunded and would not be able to help NPS achieve cooperative conservation goals.

Some commenters that preferred the No Action Alternative believed that the action alternatives were unnecessary because in their opinion the Los Angeles area currently has sufficient parklands and recreational opportunities within existing public lands. Others thought the expansion of the existing national recreation area was unnecessary because lands in the study area are already well managed and protected by zoning, difficult access and topography, and existing local regulations and oversight. A few expressed an opinion that the federal government already controls sufficient land in the area, so there is no need for a boundary addition. Agricultural interests in Ventura County identified ranchers and farmers as good stewards of the land, therefore commenting that additional protection by the NPS would be redundant with local ordinances.

A small number of comments supported expanding current management actions in SMMNRA, including working with partners to further restrict the use of rodenticides that can impact wildlife, and protecting wildlife corridors, such as a wildlife crossing over U.S. Route 101 near Liberty Canyon in SMMNRA.

Concerns about No Action

Some commenters were concerned that without a boundary addition to SMMNRA, there would be negative impacts on current parklands to meet the demands associated with a growing regional population.

Alternative B: Cooperative Conservation Area

Preference for Alternative B

Less than 1% of commenters supported Alternative B. Many of these commenters supported Alternative B because it would allow for NPS assistance to the area without additional land ownership and management or expansion of the SMMNRA. Commenters also supported Alternative B because it included all wildlife corridor connections considered in the study.

Concerns about Alternative B

Some commenters were concerned that Alternative B would encourage local and county government to develop more stringent land use policies or regulations.

General Comments on a Boundary Adjustment

Approximately 6% of the comments received expressed either support for or disagreement with a boundary adjustment in general. Comments in general support of a boundary adjustment cited the protection of biological and cultural resources, recreational opportunities and public health, cooperative conservation opportunities, youth education opportunities, and protection of land from development as reasons for their support. Some of these comments made no mention of particular alternatives, some indicated support for both C and D, and a number indicated primary support for Alternative D with Alternative C as an acceptable second choice.

Comments which generally disagreed with a boundary adjustment were concerned about the impacts of a boundary adjustment on private property or mineral rights, or that the NPS would not have the ability, funds, or authority to manage the area well. Some commenters indicated that they felt the money could be better spent on regional planning. A few commenters expressed support for controlled development in the area rather than inclusion in the national park system.

Commenters also made suggestions regarding what areas should be included or excluded from a boundary adjustment to Santa Monica Mountains National Recreation Area, but did not specify whether these should be part of alternative C or D. Suggestions for areas to be included in a specific boundary adjustment alternative are listed below. Some comments also recommended boundary additions to areas beyond the authorized Rim of the Valley Corridor study area.

General suggestions for areas that should be included in a boundary adjustment to SMMNRA (within the authorized study area):

- Focus the boundary adjustment at the base of the mountains to avoid incompatible uses such as oil wells and communications infrastructure at the top of the mountains.
- Ensure that the boundary adjustment is broad enough to consider alternative alignments of the Rim of the Valley Trail Corridor.
- Include a narrow corridor along the southeastern fringe of the Santa Susana Mountains from the Simi Hills addition to the San Gabriel Mountains to avoid oil and gas mineral estates.
- Include areas between California Highway 14 and the Angeles National Forest.

Areas suggested for exclusion from a boundary adjustment to SMMNRA (within the authorized study area):

- Fine tune boundary adjustments around developed areas but include all existing natural parkland and potential park entry points (for example, exclude developed areas south of Valley Vista in the Tarzana/Encino Area).
- Extend the boundary adjustment to the Verdugo Mountains without including the San Gabriel Mountains foothills.
- End the boundary adjustment at Wisdom Tree; do not include the Arroyo Seco.
- Exclude the following private properties:
 - Newhall Ranch properties
 - All privately owned land
 - Any land classified by the California State Mining and Geology Board and subject to the protections of the Surface Mining and Reclamation Act
 - Forest Lawn Cemetery
 - Private property within the administrative boundary of the Angeles National Forest.
- Take out the portion of the San Gabriel Mountains Watershed east of La Crescenta Valley.
- Exclude oil and gas operations.
- Exclude active landfills and solid waste facilities.
- Remove Metropolitan Water District of Southern California (MWD) facilities and related rights-of-way.
- Take out areas used for small prospecting and mining.

Areas suggested for inclusion in a boundary adjustment to SMMNRA (beyond the authorized study area):

- Add Verdugo Wash. With the approval of the Army Corps of Engineers Los Angeles River study, major ecological restoration of the wash's wetlands habitat is possible. Additionally, this effort could reconnect the wildlife corridor between the Santa Monica and Verdugo Mountains.
- Include the southwest portion of Simi Valley to accommodate a potential Rim of the Valley Trail alignment. This could include the Arroyo Simi Greenway/Bike Path Corridor.
- Include Little Tokyo, Boyle Heights and Vernon Central, the historic jazz district, in downtown Los Angeles.
- Add areas recommended as the San Gabriel Unit of SMMNRA in the San Gabriel Watershed and Mountains Special Resource Study.

Santa Susana Field Lab Contamination

Numerous commenters were concerned that SSFL should not be incorporated as a park area until the site contamination has been remediated. Commenters were also concerned that if the area became part of a possible boundary addition or park that there would be reduced efforts to clean it up. Although outside the scope of the study, there were also a number of comments expressing concern about a potential lack of follow-through with the planned level of clean-up.

Alternative C: Rim of the Valley Boundary Adjustment (Preferred Alternative)

Preference for Alternative C

Approximately 1% of commenters stated a preference supported Alternative C. Supportive commenters liked the more urban focus of Alternative C, that would focus resources where there is the greatest need for recreational opportunities and access to open space. Spreading out trail use, maintaining access to existing open spaces, and continuing SMMNRA's collaboration in a larger area were specific reasons for support. Commenters

also identified Alternative C as the more reasonable alternative; less likely to receive opposition, and more likely to be able to be implemented with limited NPS resources.

Concerns about Alternative C

Alternative C concerns generally centered around the potential effects on certain types of land uses including agricultural, oil and gas, aggregate mining, public utilities and related infrastructure. Other commenters were concerned about any potential effects on private property rights, mineral rights, and water rights. Other comments expressed concern that a boundary adjustment may affect certain recreational uses such as rock hounding/recreational mining, hang gliding, and recreational shooting. Some commenters expressed concerns about the cost associated with implementing a boundary adjustment and whether it would be feasible to implement. Many commenters, in their support of Alternative D, also expressed concern that Alternative C would not be able to do enough to protect wildlife corridors or provide recreational opportunities in the area.

Suggestions for Boundary Modifications to Alternative C

Commenters suggested that Alternative C include cooperative conservation areas focused on linking wildlife connections to the Los Padres and Angeles national forests. Other comments recommended incorporating areas considered in the Alternative D boundary adjustment area including:

- The western Santa Susana Mountains (to include a Rim of the Valley Trail connection to Happy Camp).
- Wildlife corridor linkages left out of Alternative C within the western Simi Hills, Conejo Valley area, Calleguas Creek watershed, and western Santa Susana Mountains.
- The Upper Santa Clara River and wildlife connections to the Angeles National Forest.
- All of the boundary adjustment areas included in Alternative D and not Alternative C should be included as cooperative conservation areas.
- Lands northwest of Sun Valley/Pacoima/San Fernando, especially because of potential impacts associated proposed alignments and tunnels for the California High Speed Rail project.
- Areas north and west of Simi Valley and Thousand Oaks. These areas were noted as critical habitat for wider-ranging animals such as mountain lions and mule deer.

Several comments also suggested that Alternative C exclude residential and farming areas, and only include areas that have the potential for acquisition.

Suggestions for Future Implementation and Management Related to Alternative C

Suggestions were made regarding trail connections and management, allowable uses, priority areas for new recreational opportunities and land acquisition, and protection of cultural resources including consultation with tribal organizations. While many of these comments are beyond the scope of this study, and would only apply to more specific implementation planning if Congress were to implement a boundary addition, they have been included here to represent the full range of comments received.

Comments regarding specific trail connections or trail management included:

- Connecting the Rim of the Valley Trail to the Santa Monica Mountains National Recreation Area Interagency Visitor Center at King Gillette Ranch.
- Providing equestrian trails in remote and unique areas such as Chatsworth.
- Implementation should include coordination with private landowners regarding passing through on the Rim of the Valley Trail.
- Create trailhead locations to ensure that senior citizens have opportunities to walk the Rim of the Valley Trail in shorter segments.

Some commenters expressed preference for areas to be considered a priority in future implementation. One comment suggested that priorities for land acquisition should include areas between Chatsworth Nature Preserve, Santa Susana Pass State Historic Park, Runkle Ranch, and other existing parkland areas. Other commenters expressed a preference for a priority focus on providing recreational opportunities near the most urban areas. Comments regarding allowable uses included a suggestion to restrict motorized vehicles in protected areas and a suggestion to allow access to areas that allow dogs on leash.

Regarding cultural resources, it was suggested that implementation include a plan and resources for protection of cultural and archeological resources and sites which may suffer from an increased risk of vandalism, looting, and accidental disturbance as a result of new recreational opportunities. The Fernandefio Tataviam Band of Mission Indians specifically requested consultation by agencies seeking to modify cultural resources within the traditional Tataviam territory.

Alternative D: Regional Rim of the Valley Boundary Adjustment with Cooperative Conservation Areas

Preference for Alternative D

Approximately 90 % of public comments on the study expressed a preference for Alternative D. Most of the commenters who supported Alternative D stated that they preferred this alternative because it would provide greater conservation and protection of biological resources, including habitat connections for plants and wildlife. A few also cited greater protection of water resources and associated beneficial uses, carbon sequestration, and protection of fossils, geologic resources, and cultural resource sites. These preferences were often based on the fact that Alternative D would result in the largest addition to SMMNRA and would have the greatest potential for conservation. Other commenters supported Alternative D because they believed that it could protect open space from development.

Many commenters that supported Alternative D did so because it would provide expanded recreation and visitor services across a broader geographic area, including urban areas that are deficient in outdoor recreation opportunities. Some commenters were concerned that if Alternative D was not implemented, there could be negative impacts on existing parklands, as demand for outdoor recreation continues to increase with an increasing population. Many people noted that the larger boundary expansion would expand opportunities for completion of the Rim of the Valley Trail and facilitate regional trail connectivity. Public health benefits resulting from expanded outdoor recreation and access to nature were also identified by many commenters. More interpretive and educational programs were also seen as advantages.

Many of the comments in support of Alternative D identified the ability to take advantage of NPS expertise and the potential for leveraging more funding for resource protection and recreation as reasons why they preferred this alternative. Several commenters also noted that NPS' role in assisting partners with planning and management would support local efforts. The broad range of coordination and partnership opportunities with public land management agencies, community-based organizations, and educational institutions were also noted as benefits. Some public agencies also commented that Alternative D was better aligned with their agencies' plans and policies than Alternative C. Numerous commenters cited potential economic benefits from visitor spending and job creation as another rationale for supporting Alternative D. Finally, some commenters questioned why Alternative D was not the preferred alternative since it was identified as the "environmentally preferable alternative."

Concerns about Alternative D

Concerns about Alternative D were generally similar to the concerns about Alternative C.

Suggestions for Boundary Modifications to Alternative D

Boundary adjustment recommendations suggested that the boundary adjustment be broader to connect directly with national forest lands. One comment suggested that boundary adjustment extend north toward the Los Padres National Forest to include endangered species habitat (least Bell's vireo, California coastal gnatcatcher, and spineflowers). Another commenter suggested excluding the area west of Highway 23 in the Thousand Oaks area. Another suggested modifying the boundary to include only the wildlife linkage strands mapped by the South Coast Missing Linkage Design and the areas south of Santa Clarita that connect the Santa Susana Mountains to the Angeles National Forest.

Suggestions for Implementation and Management Actions Related to Alternative D

The comments included a range of suggestions for the management of the areas considered for addition to SMMNRA in Alternative D. While many of these comments are beyond the scope of this study, and would only apply to more specific implementation planning if Congress were to implement a boundary addition, they have been included here to represent the full range of comments received. Suggestions were made in the following areas:

Ecosystem Protection and Watershed Management. Specific suggestions regarding protection of ecosystems and watersheds included: reintroduction of species (especially keystone species and predators) that were historically present; resource management emphasis on hillsides; and construction of wildlife bridges across major roads or freeways.

Partnerships and Collaboration. Some comments suggested specific agencies or organizations that should be considered potential agency partners. These included the City of Santa Clarita and nonprofit entities in general. One commenter suggested that Alternative D include the section from Alternative B regarding collaboration with landowners to plant native species and remove invasive species and establish citizen science relationships with various agencies.

Priorities for Funding and Land Acquisition. A number of comments made suggestions for funding or land acquisition priorities should Alternative D be implemented. Funding was specifically desired for trail maintenance and development. One commenter suggested that Alternative D include a clear focus on urban areas. Another comment suggested that Alternative D incorporate clear cost savings measures. Areas suggested for priority land acquisition included lands that contribute to habitat connectivity and lands with cultural, geological and historical resources.

Visitor Services and Recreational Opportunities. Many of the comments in support of Alternative D suggested specific management approaches for visitor services and recreational opportunities. The range of comments included broad programmatic suggestions, specific interpretive opportunities centered on topics or locations, suggestions for interpretive media, and suggestions for trails and other types of visitor facilities. Interpretive and educational opportunities suggested included: school trips for children; interpretive signs throughout the area; hands on workshops; and involving schools, churches and youth groups in restoration projects. One commenter emphasized expanded use of technology for engagement. Programs were suggested to encourage families, urban residents, and working citizens to visit the national recreation area. Hang gliding groups advocated for special regulations to allow hang gliding within the proposed boundary adjustment to SMMNRA.

Recreational opportunities suggested ranged from exploring creative ways to expand access and recreation opportunities, new visitor facilities, shuttles to park sites, and institutionalizing the transit to trails program to maximize access to public parklands. The types of visitor facilities suggested included creation of welcome interpretive centers that reflect the region's diversity, campgrounds, and trails. One commenter stated that

visitor facilities such as trails should only be located on public lands, as opposed to located through easements over private lands where oil and gas and communications structures are present. It was also suggested that visitor facilities should emphasize sustainability using the U.S Green Building Council's Leadership in Energy and Environmental Design (LEED) building standards and locally sourced materials. Solar energy could be used and best practices for water storage and sewage/solid waste management.

It was also suggested that should a boundary adjustment be implemented, the NPS should ensure compliance with equal justice protections under Title VI of the Civil Rights Act of 1964 and its regulations.

Suggestions for Other Designations or Other Alternatives

Beyond the alternatives presented in the draft study/EA, some commenters suggested other alternatives or designations for the area, including:

- The federally-owned portion of the Santa Susana Field Laboratory should be designated as a National Monument.
- Alternative D should be made into a separate unit of the national park system.
- Santa Monica Mountains National Recreation Area should be designated as a national park (within its existing boundary): Santa Monica Mountains and Seashore National Park.
- The Rim of the Valley Corridor should be designated as a national recreation trail.
- A variation of Alternative D with the addition of all of the Los Angeles River tributaries was suggested. The tributaries, which are outside of the study area were identified by the commenter for inclusion because of their value as wildlife corridors, importance for water flow and quality, and because they provide access to recreation and nature for underserved populations.

Recommended Changes for Selected Alternative and/or Future Legislation

Within the public comments received, several agencies, utilities, water districts, and oil and gas industry representatives requested that specific language or assurance be included in the final document's selected alternative or recommendation to Congress regarding hang gliding, eminent domain, local zoning, public infrastructure, utilities, and mineral rights (*Appendix B: Comments with Recommendations for Future Legislation that Would Expand Santa Monica Mountains National Recreation Area*). Appendix B contains specific language suggested by commenters to be included in legislation that might result from this study to expand the boundary of Santa Monica Mountains National Recreation Area. These comments should not be taken as recommendations from the NPS, but are summarized for informational purposes.

Specific suggestions from public comments included:

- Exclude solid waste facilities from the boundary adjustment or exempt them from 16 U.S.C. § 4601-22(c) (prohibition of solid waste disposal operations in national parks).
- Ensure that the NPS and the Secretary of the Interior protect access to private oil, gas and other mineral rights under any legislation that would authorize expansion of the SMMNRA boundary.
- Verify that any Congressional legislation establishing a SMMNRA boundary adjustment clearly states that the legislation will not alter existing zoning or development regulations that govern properties within the proposed boundary.
- Include specific provisions to reserve Metropolitan Water District and other agencies' rights to conduct necessary maintenance and repairs of their existing and proposed facilities within any boundary addition.
- Prohibit the use of eminent domain in any proposed Congressional legislation.
- Make it clear that nothing resulting from the study will result in a loss of existing private property rights or controls.
- Clearly state that water rights would not be affected and that infrastructure associated with flood

protection, storage and transport of water supplies, treatment of water and wastewater, electrical transmission and telecommunications infrastructure, and sanitation facilities would be protected and preserved.

- Provide special regulations to allow hang gliding within the proposed SMMNRA boundary adjustment.
- Do not add more restrictions on water districts, utilities, and private properties.
- Allow for existing shooting ranges within the proposed boundary adjustment.
- Remove cemeteries from the proposed boundary adjustment.

Environmental Assessment

Level of Analysis

Comments on the environmental assessment included suggestions for supplemental information and additional analysis, including consideration of impacts on oil and gas exploration and resource extraction, solid waste facilities, water supply and flood protection facilities, communication and electrical infrastructure, socioeconomics, environmental justice, grazing, local land use and existing regulatory authorities, valid existing rights (property, water, mineral), traffic, certain recreational uses, biological resources, and water resources. Some commenters called for completion of a full environmental impact statement to address impacts from the study on socioeconomics, the Rim of the Valley Trail, and potential impacts on wildlife from recreational use.

Cumulative Impacts

Commenters provided additional information about the potential for cumulative effects to occur based on the number of major residential and suburban development proposals in the area, such as Newhall Ranch, Canyon Hills, Canyon Park Homes, and Upper Browns Canyon/Hidden Creeks Estates. In addition, there were comments noting possible expansions of landfills, such as Scholl Canyon, and proposed road (Interstate 710) expansion and high speed rail projects in/near the study area.

Recreation Use and Visitor Experience

Some commenters shared concerns about the loss or further restriction of specific existing recreational activities in the study area, particularly hang gliding and shooting sports as a result of including certain areas within the SMMNRA boundary. These commenters shared a desire to find a way to continue these activities should there be additional NPS management in parts of the study area. Other commenters expressed concerns about potential conflicts between expanded trail use and shooting ranges.

Socioeconomics and Environmental Justice

Some commenters expressed concern that the environmental assessment should have further analyzed the potential effects on certain economic sectors including grazing and mineral extraction. Other commenters expressed interest in exploring the potential effects of climate change on low-income populations and communities of color. These comments also noted that the discussion of environmental justice should more thoroughly analyze the need for small, need for small, minority, women, and veteran-owned enterprises to enjoy economic benefits, and the need to avoid displacement and gentrification.

Land Use, Regulatory Authorities, and Jurisdiction

Many commenters were concerned about the effect of a boundary adjustment on certain types of land uses. These commenters expressed concern about potential impacts that should be explored further in the analysis. Despite language in the alternatives that stated otherwise, some commenters remained concerned that designation would give the NPS some degree of control over local land use decisions through the imposition of new regulations and restrictions.

Water Supply and Flood Protection

Several city and county government entities expressed concern that their missions related to flood protection, water supply, and water quality would be impacted by an NPS designation. These public utility and water districts manage infrastructure in areas proposed for boundary addition, including pipelines, flood control channels, reservoirs, and other facilities related to water supply and flood protection. As a result some commenters requested specific language protecting these operations and uses are included in the final alternative and/or any future legislation for a possible boundary addition. These comments are included in *Appendix B: Comments with Recommendations for Future Legislation that Would Expand Santa Monica Mountains National Recreation Area*.

Oil and Gas Operations/Mineral Extraction

A number of oil and gas industry representatives commented that the number of oil and gas operations in the study area was greatly underestimated in the draft study/EA. These comments expressed concern about NPS regulations regarding nonfederal oil and gas leasing and their effects. One commenter was concerned about regulatory impacts on aggregate mining operations and suggested that areas valued for aggregate by the California State Mining and Geology Board be removed from any proposed boundary adjustment.

Landfills and other Solid Waste Facilities

Commenters, including operators of existing landfills, requested that these lands not be included in a boundary adjustment in alternative C or D. The primary reason for this concern was because of NPS regulations that prohibit certain solid waste facilities in units of the national park system.

Electrical and Telecommunications Infrastructure

Several utility companies commented on potential adverse effects from a SMMNRA boundary adjustment on existing and future electrical and telecommunications infrastructure and rights-of-way.

Grazing Lands

Commenters were concerned that allowing more opportunities for outdoor recreation in areas where there are working cattle ranches in Ventura County may result in trespassing, excessive foot traffic in previously unimpacted areas, vandalism, cut fences, and graffiti. One comment also noted the compatibility of grazing areas with protecting open space.

Private Lands

A number of commenters expressed concern about use of eminent domain, regulation, and easements and how these could affect ranches, single family homes, and cemeteries. Some of these comments suggested that private lands of all types be excluded from any boundary adjustment proposal.

IV. Response to Substantive Comments on the Draft Rim of the Valley Corridor Special Resource Study / Environmental Assessment

The NPS reviewed all comments submitted on the *Rim of the Valley Corridor Draft Special Resource Study and Environmental Assessment* (draft study/EA). The following substantive comments were organized and analyzed by topic areas that correlate with sections of the draft study /EA. The NPS 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:

- (a) question, with reasonable basis, the accuracy of information in the environmental analysis.
- (b) question, with reasonable basis, the adequacy of environmental analysis.
- (c) present reasonable alternatives other than those presented in the environmental analysis.
- (d) cause changes or revisions in the proposal.

In other words, substantive comments raise, debate, or question a point of fact or analysis.

Responses to comments that contain substantive points regarding information in the draft study/EA are provided in the following section. Additionally, responses to some non-substantive comments are provided in order to provide needed clarification. Concern statements have been developed to summarize both sets of comments. Where appropriate, corrections to the draft study/EA are described in the *Errata* available on the study website (www.nps.gov/pwro/rimofthevalley). The final recommendations for the study are included in the Final Report Summary and are also in the Finding of No Significant Impact (November 2015). The draft study /EA, *Errata* to the draft study/EA (*Errata*), and the *Finding of No Significant Impact* together complete the study process.

Resource Description

Geologic Resources

Public Concern: Although waterfalls in the San Gabriel Mountains are listed on page 110 of the draft study/EA, those in the Santa Susana Mountains and Simi Hills are not acknowledged in the same way.

Response: As noted by the commenter, the waterfalls of the Santa Clarita Woodlands and Simi Hills areas add to the recreational value of the study area. If Congress were to expand the SMMNRA boundary, park managers would undertake a more comprehensive evaluation of recreational and scenic resources in the area.

Public Concern: Figure 2-2: Geology (the Geologic Map). Text information for the map units is incomplete, not reflected or shown on the map.

- Some Cenozoic formations are named and assigned geologic ages in the text; however, radiometric ages are not provided in either the text or on the geologic map.
- Some faults are named and described in the text (p. 39) but they are not named on the map. This is a major and significant failing of the geologic map and the report.
- The only strike-slip fault (dashed line) shown on the map is in sandstone and alluvial deposits near Santa Clarita. Dashed faults represent inferred faults. The dashed fault on the map is shown to fault or offset alluvial deposits. There are very few places on this map where it can be shown that alluvial deposits are offset by faults. Where faults are in alluvial deposits they should be dotted (i.e., buried; but dotted or

buried faults are not shown in the explanation). The San Andreas Fault (or fault zone) is a strike-slip fault, a right-slip strike-slip, or a rightslip fault zone. It should be labeled, e.g., SAF with arrows. It is not a normal fault.

- The San Gabriel Fault is also a right-slip fault (SGF, with arrows). It is not a normal fault, as shown.
- The barbed faults on the map are either thrust or reverse faults. Teeth are on the upper plate.
- The Santa Cruz Island-Malibu Coastal-Santa Monica-Hollywood fault is a left-slip fault (locally modified to a reverse fault) that separates the Transverse Ranges from the Peninsular Ranges. The Western Transverse Ranges were rotated along this fault 18-17 million years ago. This major fault zone should be labeled (e.g., SCI-MC-SM-H, with left-slip arrows. The barbs are confusing and thrust faulting is locally a late stage of tectonism; I wouldn't show barbs).
- The Verdugo-Eagle Rock fault zone is a reverse fault, locally it is in part a thrust fault where its dip is less than 45°. The northern block, Verdugo Mountains-San Rafael Hills moved up relative to the San Fernando Valley. Teeth should be on the southeast side of the fault at the eastern end of the fault.
- The Newport-Inglewood fault is only partially shown on the map; however, it is very near UCLA, 405 south of Sunset Blvd., and the Long Beach Earthquake took place along this right-slip or right-lateral fault (an active fault zone). An arrow pointing to the south should be on the right/east side of this fault, and an arrow, pointing north should be depicted on the left/west side of the fault.

Response: *Figure 2-2: Geology* has been replaced with the *California Geologic Map*. The map was originally created in 1977 and updated in 2010. *California Geological Survey, Geologic Data Map No. 2*, Compilation and Interpretation by: Charles W. Jennings (1977), Updated version by: Carlos Gutierrez, William Bryant, George Saucedo, and Chris Wills Graphics by: Milind Patel, Ellen Sander, Jim Thompson, Barbara Wanish and Milton Fonseca. The map is available online at: http://www.conservation.ca.gov/cgs/cgs_history/Pages/2010_geologicmap.aspx. The *Errata* for the draft study/EA contains this geologic map cropped to the study area.

Public Concern: The study report does not adequately explain the differences between the shallow, granitic soils of the San Gabriel and Verdugo Mountains and the generally deeper soils derived from sedimentary rocks in the Santa Susana Mountains. The differences in these soils and substrates have biological, topographical, and petroleum-related consequences.

Response: Given the broad nature of the study, the study provided sufficient information to demonstrate the diversity and rarity of geological resources in the study area. If Congress were to expand the SMMNRA boundary, park managers would complete more comprehensive inventories of the variety of resources represented in the area.

Mineral Resources

Public Concern: The description of the nature of hydrocarbon mineral rights is not accurately described in the study. The draft study/EA does not distinguish between surface and subsurface ownership of mineral rights.

Response: In the feasibility evaluation on pages 199 and 219, the draft study/EA acknowledges that NPS nonfederal oil and gas regulations would primarily apply if NPS were to purchase lands where oil and gas rights are retained by another entity.

Language has been included in the selected alternative emphasizing that the selected alternative would not affect valid existing mineral rights. It should also be noted that the selected alternative has been revised to avoid areas of the Santa Susana Mountains with the highest concentrations of oil and gas operations. The resource description for mineral resources has also been revised to acknowledge

mineral rights in the study area (see *Errata* for page 41 of the draft study/EA).

Water Resources

Public Concern: *Figure 2-4: Flood Protection and Water Transfer Facilities* is missing several important well-known Los Angeles County flood control dams and water transfer facilities, including but not limited to Devil's Gate Dam and the dam and transfer facility at Eaton Canyon.

Response: *Figure 2-4: Flood Protection and Water Transfer Facilities* (page 49) identifies Devil's Gate Dam as well as the basin behind the dam. The dam is also listed on page 355 in *Table D-1: Dams within the Study Area* and in several other locations (page 50, 95, 118, and 381). The transfer facility to convey water from Devil's Gate Dam area to Eaton Canyon is not shown on in *Figure 2-4: Flood Protection and Water Transfer Facilities* on page 49 because this facility has not yet been constructed.

Public Concern: *Figure 2-3: Major Watersheds* does not list the Arroyo Seco as a major watershed yet it is one of the major restoration projects listed that could be funded under alternatives C and D.

Response: The Arroyo Seco Watershed is not shown in *Figure 2-3* because it is a sub-watershed of the Los Angeles River Watershed shown on the map. Sub-watersheds are not identified on *Figure 2-3*.

Public Concern: Metropolitan Water District of Southern California facilities, including eight water supply pipelines and the Joseph P. Jensen Water Treatment Plant, are not included in the description of water resources/land use.

Response: The water resources description did not include an inventory of water supply pipelines nor water treatment facilities, however, a written description of the MWD water supply pipelines and the Joseph P. Jensen Water Treatment Plan has been added to page 49 (see *Errata*).

Public Concern: The description of water reclamation plants in Appendix D incorrectly identifies Los Angeles Department of Water and Power, instead of the Department of Sanitation as the agency in charge of these City of Los Angeles facilities. The description is also missing the Terminal Island Reclamation Plant.

Response: The agency identified as managing the City of Los Angeles' water reclamation plants has been updated on page 356 (see *Errata*); however, the Terminal Island Reclamation Plant is not included in the inventory because it is located outside of the study area.

Public Concern: The role of the City of Los Angeles Department of Sanitation and Department of Water and Power, as well as other agencies, in the preservation and quality of the Los Angeles River and Sepulveda Basin is not acknowledged.

Response: Efforts to preserve and improve the quality of the Los Angeles River and Sepulveda Basin have involved a broad range of agencies and stakeholders. Given the scope of the study, these activities are described generally and do not include exhaustive lists of participants in these efforts.

Biological Resources

Public Concern: The flowering ash is an important woodland and forest tree of the Santa Susana Mountains, but it is not mentioned in the Study.

Response: The study area is large and exceptionally diverse, which makes it impractical to mention every species found in the area. The species which are mentioned in the draft study/EA generally fall into one of three categories: species characteristic of a vegetation habitat type under the California Wildlife Habitat System; special status species; and species with a particularly unusual or rare natural history.

Public Concern: The use of scientific names is inconsistent. Some common names are listed with scientific names, but others are not.

Response: The scientific name is included the first time a species is mentioned. To make the document easier to read, only the common name was used in each subsequent mention. In addition, for some species, such as birds, there is a formal common name.

Public Concern: The map of Federally Listed Threatened and Endangered Species (Figure 2-7) does not indicate the number of individuals sighted at each mapped instance. Without this information the map is meaningless.

Response: The purpose of the map is to show the diversity and abundance of resources in the area, and would be unreadable with the suggested level of detail. The study draws broad conclusions based on analysis of a variety of resources and these conclusions would not differ by adding more detail. Detailed information on each mapped instance, including number of species sighted, is publically available from the California Natural Diversity Database, maintained by the California Department of Fish and Wildlife.

Public Concern: The description of vernal pools in the study area on page 61 is incorrect in referring to "verified" vernal pools. "Verified vernal pool" has a legal meaning in some New England states, but not in California.

Response: The *Errata* for the draft study/EA contains a correction to this paragraph and removes the erroneous "verified vernal pool" terminology.

Public Concern: The study does not list the following vernal pools in (or just outside) the study area and their sensitive species: Tierra Rejada (California Orcutt grass, Critical Habitat for Riverside fairy shrimp, and other rare wetland plant species); Santa Clarita vernal pool (near the end of Via Princessa, Riverside fairy shrimp); Golden Valley Ranch vernal pool (Riverside fairy shrimp and spadefoot toad); Chatsworth Preserve (dry reservoir and multiple vernal pools, spadefoot toad, others); East of Moorpark College (two pools with spadefoot toad); Newhall Ranch (two pools with spadefoot toad).

Response: Those additional pools cited in the concern that could be confirmed based on a published study or agency report have been added to the *Errata*.

Public Concern: Table D-7 is misleading because it only includes sightings from the California Natural Diversity Database and a few published studies. Area organizations can provide a much more complete picture of the range of species of interest in the study area.

Response: The level of detail regarding individual species sightings provided sufficient information to demonstrate the diversity and rarity of biological resources in the study area, determine their national significance, and evaluate the importance of including their habitat in a potential boundary adjustment. If Congress were to expand the SMMNRA boundary, park managers would complete more detailed and comprehensive inventories of resources and would coordinate with area organizations in this effort.

Cultural Resources

Public Concern: In the document, the NASA test stands at the Santa Susana Field Laboratory site may be confused with “the Bowl” test stands. Department of Energy activities are also combined with other site activities.

Response: NPS has revised the draft study/EA to clarify that the Alfa, Bravo, Coca, and Delta test stands were developed later in Area II (see *Errata* for pages 97 and 98).

Public Concern: Documentation cited in the EA regarding the 1959 Sodium Reactor Experiment has been refuted by a number of investigators, none of which are cited in the draft study/EA. The effects of the 1959 accident are less than many believe. Two radioactive gases, certain isotopes of xenon and krypton, both inert, were released in small quantities.

Response: NPS has revised the draft study/EA to reflect the more recent studies on the effects of the 1959 accident at the nuclear reactor noted in the comment (*Errata* for page 98).

Public Concern: The Fernandefio Tataviam Band of Mission Indians provided a number of technical corrections to description of the Tataviam and their associated sites in the resource description, national significance analysis, and environmental consequences sections of the draft study/EA.

Response: The NPS has made the requested corrections to the draft study/EA (see *Errata* for Chapters 2, 3, and 6). *Figure 2-11: Ethnographic Native American Territories* in Chapter 2 has been renamed, *Linguistics: Regions in which the languages of California were spoken prior to European contact*.

Public Concern: The draft study/EA does not include important historical accounts of the Los Angeles River, the branches of the Zanjias, and El Pueblo de Los Angeles related to grapes and their vines, vineyards, wine and brandy production, imbibing, and sales.

Response: The NPS has revised the draft study/EA to include information about vines, vineyards, and wine production (see *Errata* for pages 84 and 86).

Public Concern: The environmental assessment does not recognize that the NASA-administered sites of the Santa Susana Field Laboratory are considered a sacred site pursuant to Executive Order 13007. The Santa Ynez Band of Chumash Indians designated the NASA portion of the Santa Susana Field Laboratory property as an Indian sacred site pursuant to Executive Order (EO) 13007 by letter dated December 10, 2012.

Response: The NPS has revised the draft study/EA to reflect that a portion of the NASA-administered lands at the Santa Susana Field Laboratory has been designated as an Indian sacred site (see *Errata* for pages 80 and 279 of the draft study/EA).

Recreational Resources

Public Concern: The correct name is Los Encinos State Historic Park, not Los Encinos State Park.

Response: Corrections have been made in the *Errata* for the draft study/EA.

Public Concern: The study did not correctly convey Resource Conservation District programming in the recreation description, which is conducted under a contract with the San Fernando Valley Audubon Society.

Response: Corrections have been made in the *Errata* based on the details provided in the comment (see *Errata* for page 115 of the draft study/EA).

Public Concern: On page 18, the study refers to the *County of Los Angeles Santa Susana Mountains Trail Master Plan* as "underway." That plan is now completed and has been adopted as a component of the County *General Plan*.

Response: Corrections have been made in the *Errata* for the draft study/EA (see page 18).

New National Park Unit Criteria Analysis

Significance

Public Concern: The significance of the Santa Susana Mountains in the areas of mountain building, scenery, and natural resources is not adequately described in the report. The Santa Susana Mountains are among the fastest growing in the world.

Response: Although there are many outstanding characteristics of the Santa Susana Mountains described in the draft study/EA, the NPS was unable to verify that the Santa Susana Mountains are among the fastest growing in the world. If designated by Congress as part of a SMMNRA boundary addition, additional information would be sought.

Suitability

Public Concern: The description of Land Ecosystems on page 161-163 is incorrect. Some of the biomes receive mention; others don't. Dry coniferous forest is not a biome.

Response: The description of Land Ecosystems in the suitability analysis is a tool to compare the study area to other national park units under the NPS thematic framework. For a park 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 system or comparably protected. The publication *National History in the National Park System and on the National Registry of Natural Landmarks* (NPS 1990) describes parks according to a series of natural history themes, including the land ecosystem types listed in the study. This guide does not provide a complete description of biomes, but rather broad categories of ecosystem types used to categorize and compare national parks. For a more complete overview of ecosystems in the study area, arranged according to a more commonly used classification scheme (the California Wildlife Habitat Relation System), see Chapter 2: Resource Description, pages 53-61 in the draft study/EA.

Feasibility

Public Concern: Federal resources are not sufficient to support an expansion of Santa Monica Mountains National Recreation Area. Specific concerns include:

- The difficulty in managing an area with the sheer size and configuration of the expanded boundary has been grossly underestimated.
- Inadequate staffing could result in a lack of trail safety and increased wildfire risks.
- Proposed partner agencies, such as California State Parks, SMMC, and MRCA, are also underfunded and will not be able to help the NPS achieve collaborative conservation goals (such as additional trails or land acquisition) in the area.

Response: If Congress were to authorize any of the study recommendations, actual funding would be determined by Congress within the broader federal budgetary process. The study recognizes that funding is limited given current budget constraints and that this may affect the timing and level of implementation efforts.

Public Concern: *Figure 3-3: Land Use* does not contain certain known land uses, including:

- the commercial industrial corridor of Woodbury Road in Altadena
- existing industrial and commercial areas of incorporated and unincorporated East Pasadena, including enterprise zones,
- industrial zones in Sierra Madre (some of those have been continuously industrial for over 100 years), in incorporated and unincorporated Arcadia, and in Glendale
- agricultural land in Sierra Madre

Response: *Figure 3-3: Land Use* was developed using data from the Southern California Association of Government's 2005 land use data mapped at the 2.5-acre minimum scale. The parcels listed in this comment may not be of a size that would be visible at this scale. In addition, the areas specifically mentioned are outside of the study area and therefore do not affect it or the selected alternative.

Public Concern: There study maps are missing over 2,000 acres of preserved and protected public lands in the Santa Clarita area.

Response: For the most part, the additional open space areas owned by the City of Santa Clarita and its partners that were provided to the NPS as a data layer have been added to the map of the final selected alternative. The only exception is the Newhall Ranch Open Space because it is contingent on development plans and the area is not currently open to the public.

Public Concern: The Forest Lawn property should be mapped as a cemetery. Characterizing the Forest Lawn Property as "Other Open Space," is inaccurate and misleading.

Response: *Figure 3-3: Land Use* includes cemeteries as "other open space." For the purposes of the map, cemeteries are displayed in this broader category of land use. Including the 565 acres of land dedicated to cemetery operation and development would account for less than one-tenth of one percent of the overall study area and would be difficult to read on the scale of *Figure 3-3*. As a result, mapping these areas as cemeteries would not change the percentage of land in the study area that is undeveloped or protected open space. In addition, the NPS has provided additional information about this type of land use in the narrative describing land use. Please see the *Errata* for page 185 of the special resource study.

It should also be noted that being located within the boundary of SMMNRA would not change their use, or local regulatory processes, or local ordinances that apply to cemetery use and management.

Public Concern: The outlines of existing oil fields should be included on *Figure 3-3: Land Use*.

Response: In response to this and other similar comments about existing oil fields, the NPS has prepared a separate map of existing oil fields in the study area (see *Errata* for the draft study/EA *Figure 2-2a: Existing Oil Fields*).

Public Concern: The County of Los Angeles Department of Parks and Recreation has recently purchased a 27.15 acre parcel referred to as "Browns Canyon" in unincorporated Chatsworth (within the Alternative C proposed boundary addition). The property is situated adjacent to the Michael D. Antonovich Regional Park which is maintained by the Mountains Recreation and Conservation Authority (MRCA). This is not reflected on the maps of public lands in the study area.

Response: The NPS has added the 27.15 acre parcel owned by Los Angeles County Department of Parks and Recreation in Brown's Canyon to the base map of public lands for the selected alternative.

Boundary Adjustment Criteria Analysis

Public concern: The alternatives include land uses that are incompatible with NPS regulations and policies, including boundary adjustment criteria. Agricultural, oil and gas, other mineral, residential and commercial land uses on private property are not compatible with park purposes. Therefore lands with these uses should not be included in SMMNRA.

Response: The current Santa Monica Mountains National Recreation Area contains a wide range of land uses, including agricultural, residential, and commercial properties that remain in private ownership. Appropriate uses of these lands are determined by county or municipal zoning ordinances.

Although there are NPS regulations that pertain to oil and gas operations within a national park unit (36 CFR Part 9, Subpart B - Non-Federal Oil and Gas Rights), such activities are not necessarily incompatible with park purposes. Within the national park system there are over 500 active oil and gas wells in 12 national park units. As stated in 36 CFR, Section 9.30, Purpose and Scope, "These regulations are not intended to result in the taking of a property interest, but rather to impose reasonable regulations on activities which involve and affect federally-owned lands."

Areas with high concentrations of oil and gas production and active mineral extraction have largely been excluded from the selected alternative. Facilities that remain are included because they are interspersed with resources of significance. Residential, commercial, and industrial areas on the periphery of the most urban areas, and areas with landfills or other solid waste facilities have also been excluded to the extent practicable from the selected alternative.

Public Concern: Including any additional areas in SMMNRA boundary will not enhance protection for new areas because of the limited SMMNRA budget. The USFS and NPS also have sufficient existing authorities to promote cooperative and voluntary protection and enhancement of habitat connections and recreation, to provide regional coordination to complete the Rim of the Valley Trail, and to acquire land. The action alternatives are unnecessary because existing federal, local, and state interests in the study area are sufficient to protect resources.

Response: The NPS study finds that although other agencies and organizations would provide some level of protection under current conditions, a boundary adjustment would provide NPS with the widest range of conservation tools and authorities. These tools include direct land conservation by the NPS to protect the broader ecosystem and funding to provide facilities that support recreation and public enjoyment. Many of the agencies that currently manage land for conservation and recreation within the proposed boundary adjustment have supported including these lands within the boundary of SMMNRA.

Public Concern: The Los Angeles River tributaries and other areas should not be dismissed as a potential trail or wildlife corridor. Use of roadways, including underpasses and storm drains by wildlife is well-documented.

Response: The draft study/EA acknowledges the importance of the Los Angeles River and its tributary, the Arroyo Seco, as important for wildlife movement and recreation (see *Table 4:1 SMMNRA Boundary Adjustment, Areas Eligible for Inclusion in SMMNRA*). Portions of the Los Angeles River and its tributaries have been included in the selected alternative. Other tributaries are outside the study area authorized by Congress. In these areas, the NPS could work cooperatively under existing authorities to explore wildlife movement and trail opportunities to connect tributaries.

Study Process

Public Concern: The NPS study alternatives encompass up to 23,000 acres of Newhall Land's private property, which conflicts with the 2008 Congressional authorization to complete a special resource study. According to P.L. 110-229, the Rim of the Valley study was to focus on mountain areas, not on the flatland river areas.

Response: The National Park Service defined the area for study by examining the study act's legislative history and intent, through public documents that use the term "Rim of the Valley Corridor," and through the public scoping process. The team determined that the area "known as the Rim of the Valley Corridor" refers to the State of California's Santa Monica Mountains Conservancy Zone - Rim of the Valley Corridor map first approved by the State of California in 1984. This map was adopted as the study area for this special resource study (draft study/EA, page 4).

Public Concern: The City of Los Angeles includes 95 Neighborhood Councils, the members of which are elected officials. Because West Hills, a community represented by a Neighborhood Council, is not represented on study maps though it is included within the study boundary, Neighborhood Councils may not have been contacted during the study outreach process.

Response: As part of the outreach and public engagement process, NPS staff sent materials to all names on the publicly-available contact lists for all City of Los Angeles Neighborhood Councils that are within the study boundary, including West Hills Neighborhood Council. West Hills is included in the description of communities on pages 192 and 280 in the draft study/EA.

Public Concern: The legislative history of the study legislation places a high priority on the protection of private property rights that is not reflected in the study analysis. Congress directed the NPS to respect the legitimate private property values of existing property owners. Therefore, the study should focus on collaboration rather than boundary expansion.

Response: Although the final study authorizing legislation did not emphasize protecting the rights of private property owners, it is the practice of the NPS to do so. The study emphasizes that the proposed boundary adjustment would not affect private property or other valid existing rights, such as mineral rights. Whereas all action alternatives include collaborative management, similar to that used by the

SMMNRA now, the selected alternative was modified, in part, to minimize the amount of private property in the revised boundary configuration. As a result, the selected alternative focuses on connecting areas of existing public land, anchoring proposed expansion areas to those existing public lands where possible.

Alternatives

General Concerns Relating to a Boundary Addition (No Alternative Specified)

Public Concern: Any facilities constructed in an expanded SMMNRA should emphasize sustainability using U.S Green Building Council's Leadership in Energy and Environmental Design (LEED) building standards and locally sourced materials. Wind and solar energy should be used to supply power and best practices for water storage and sewage/solid waste management should be used.

Response: If a boundary adjustment to SMMNRA was implemented by Congress, the National Park Service could explore the potential need for facilities to support visitor use and park management. The Department of the Interior has identified goals for sustainable development. NPS is required by management policies to attain LEED silver or better building standards in the construction of new facilities (but generally self-certifies). The Santa Monica Mountains Anthony C. Beilenson Visitor Center at King Gillette Ranch is the first "net zero" visitor center in the national park system and the NPS is working with the U.S. Green Building Council to qualify the building as a LEED certified facility.

Public Concern: Shooting ranges should be allowable uses within the boundary adjustment.

Response: Although shooting ranges would not be permitted on NPS-owned and managed lands, any shooting ranges located on other public or private land would continue to be regulated by local and state agencies or other federal authorities that have jurisdiction in the area.

Public Concern: Alternatives should make it clear that nothing resulting from this study will result in a loss of existing private property rights and controls.

Response: The proposed boundary addition would not affect private property or other valid existing rights, such as mineral rights. NPS policy is to acquire lands and interests in lands only from willing sellers. In some cases Congress has expressly limited NPS land acquisition authorities in subsequent legislative proposals by limiting NPS land acquisition only to lands for which there are willing sellers. As stated on pages 222-223 of the draft study report/EA, most NPS regulations do not apply to privately-owned lands.

Public Concern: The NPS and the Secretary of the Interior should ensure that any proposed legislation to authorize any portion of the Study Area for inclusion in the SMMNRA also protect access to private oil and gas mineral rights.

Response: As stated in 36 CFR, Part 1, Section 9B, NPS regulations of nonfederal oil and gas leasing are designed to ensure that activities undertaken pursuant to these rights are "conducted in a manner consistent with the purposes for which the national park system and each unit thereof were created, to prevent or minimize damage to the environment and other resource values, and to ensure to the extent feasible that all units of the national park system are left unimpaired for the enjoyment of future generations." These regulations are not intended to result in the taking of a property interest, but rather to impose reasonable regulations on activities which involve and affect federally-owned lands.

This language has been included in the selected alternative. It should also be noted that the selected alternative does not include areas of the Santa Susana Mountains with the highest concentrations of oil and gas operations.

Public Concern: Add the following areas (outside the study area) to the selected alternative:

- Verdugo Wash: With the approval of the Army Corps of Engineers Los Angeles River study, major ecological restoration of the wash's wetlands habitat is possible, and this could reconnect the wildlife corridor between the Santa Monica and Verdugo Mountains.
- Southwest portion of Simi Valley, including the Arroyo Simi Greenway/Bike Path Corridor, to accommodate a potential Rim of the Valley Trail alignment.
- Little Tokyo, Boyle Heights and Vernon Central in downtown Los Angeles.
- Protected Lands to the north of the current Alternative D boundary, including areas between the study area and Los Padres National Forest to include rare species habitat (least bell's vireo and California gnatcatcher habitat near the intersection of the 118 and 405 freeways and California gnatcatchers and spineflowers habitat near the 210 freeway).

Response: The boundaries of the selected alternative do not extend beyond the area that Congress intended the NPS to study or beyond areas that have been vetted by the public in previous public engagement periods for this study. However, as is currently the case with Santa Monica Mountains National Recreation Area, the selected alternative proposes that the NPS to provide technical assistance to communities beyond proposed National Park Service boundaries for planning, interpretation and education.

Public Concern: The Santa Susana Field Laboratory property should not become part of a potential boundary addition until the site has been remediated.

Response: The Department of the Interior discourages acquisition of property contaminated with hazardous substances. Inclusion of these lands in the proposed boundary addition does not imply that the NPS would acquire the property. Department of Interior policy states that contaminated lands should not be acquired unless otherwise directed by Congress, court order, or as determined by the Secretary of the Interior. Although the area is within the proposed boundary addition, nothing in the study could be used to prevent or change existing plans for remediating the site.

Cooperative Conservation Areas

Public Concern: The following areas should be added as Cooperative Conservation Areas:

- Expand Alternative D cooperative conservation area to include Vasquez Rocks to the east.
- Expand cooperative conservation areas linking to the Los Padres National Forest (critical wildlife area).

Response: The selected alternative incorporates the language pertaining to the cooperative conservation areas as proposed in alternatives B and D in the draft study/EA. This language emphasizes that the NPS would use existing authorities to pursue voluntary cooperative conservation of critical habitat linkages outside of the proposed boundary addition. This authority need not be limited to a specific location.

Areas suggested for Exclusion from a Selected Alternative

Public Concern: The boundary addition should exclude any properties within the administrative boundary of the Angeles National Forest.

Response: The Angeles National Forest has been excluded from the selected alternative.

Public Concern: Oil and gas operations are incompatible with NPS policies and should not be included in the SMMNRA boundary addition.

Response: Areas with high concentrations of oil and gas production in the Santa Susana Mountains have largely been excluded from the selected alternative. Areas that remain are included because they connect public lands and resources of significance such as wildlife habitat. Although there are NPS regulations that pertain to oil and gas operations within a national park unit (36 CFR Part 9, Subpart B - Non-Federal Oil and Gas Rights), such activities are not necessarily incompatible with park purposes. Within the national park system there are over 500 active oil and gas wells in 12 national park units. As stated in 36 CFR, Section 9.30, Purpose and Scope, "These regulations are not intended to result in the taking of a property interest, but rather to impose reasonable regulations on activities which involve and affect federally-owned lands."

Public Concern: Residential (and proposed residential developments such as Newhall Ranch) should be excluded from any proposed boundary addition.

Response: The selected alternative excludes most high density residential, commercial, and industrial areas along the periphery of the proposed boundary adjustment. Private land remaining within the proposed boundary would continue to be subject to local land use zoning and regulations.

Public Concern: Exclude any land classified by the California State Mining and Geology Board and subject to the protections of the Surface Mining and Reclamation Act from the proposed boundary addition.

Response: Existing aggregate mining areas have generally been excluded from the selected alternative. Valid existing rights are not affected through inclusion in a national park boundary. If the lands subject to future mining operations are privately-owned, then the NPS permits and regulations would not generally apply, unless such activities required access on or across federally-owned lands. If access was needed across federal lands, some regulations may apply to minimize adverse impacts on the federal lands and visitors.

Public Concern: The Forest Lawn Cemetery should be excluded from a boundary adjustment to SMMNRA. It would not contribute to the purposes of the park.

Response: The inclusion of Forest Lawn Cemetery within the proposed boundary of the selected alternative would not change the land use zoning of this private land nor affect the operations of this or any other privately owned cemetery. The draft study/EA acknowledges that the eastern Santa Monica Mountains contain areas of high biodiversity and corridors important for wildlife movement (see *Table 4:1 SMMNRA Boundary Adjustment, Areas Eligible for Inclusion in SMMNRA*).

Public Concern: The boundary adjustment should exclude all landfills.

Response: Solid waste facilities are generally not allowed to operate in a national park unit per 36 CFR, Chapter 1, Part 6. Therefore, active solid waste facilities have generally been excluded from the selected alternative. However, there are some closed or inactive landfills included.

Public Concern: Exclude the Metropolitan Water District of Southern California's (MWD) facilities and related

rights-of-way and include express language reserving MWD and other agencies' rights to conduct necessary maintenance and repairs of their facilities within the boundary addition area.

Response: The selected alternative acknowledges the need for public utilities in a complex urban area such as the greater Los Angeles Metropolitan region. It should be noted that NPS policies related to rights-of-way pertain to federally-owned lands under NPS jurisdiction. The proposed boundary addition contains private, state, and locally-owned lands (with some parcels federally-owned and managed by the U.S. Army Corps of Engineers) and therefore, the NPS policies and guidelines would not pertain to these lands.

It is not the intent of NPS to acquire all of the land in the proposed boundary addition, but to manage lands cooperatively with existing private, state and local entities. Permits are required on NPS managed lands. NPS would work with the permittees on a case by case basis according to NPS laws and policies including: 36 CFR, Part 14, Director's Order 53: *Special Park Uses*, and *NPS Management Policies 2006*, Section 8.6.4. It should be noted that two MWD pipelines traverse the existing boundary of SMMNRA.

Public Concern: Exclude the portion of the San Gabriel Mountains Watershed east of La Crescenta Valley from the boundary addition.

Response: Only very small areas of the upper Rio Hondo Watershed (also a tributary to the Los Angeles River) are included in the proposed boundary addition. These areas are located in the San Gabriel Mountains foothills and provide entry points to the Rim of the Valley Trail where it enters the Angeles National Forest.

Areas Suggested for Inclusion in a Boundary Addition

Public Concern: The boundary addition should only include a narrow corridor along the southeastern fringe of the Santa Susana Mountains (to avoid the mineral estates).

Response: The Santa Susana Mountains contain resources of significance and important connectivity for wildlife and recreation, therefore adding a narrow sliver along the southeastern fringe would not fulfill the purpose and need of the boundary addition. However, in the selected alternative the proposed boundary excludes the most active oil and gas operations within the Santa Susana Mountains.

Public Concern: Alternative C should include the habitat linkages in the western Santa Susana Mountains, Simi Hills, Conejo Valley, and Calleguas Creek watershed.

Response: The selected alternative includes 53,000 acres of lands in the western Santa Monica Mountains, Calleguas Creek area, Conejo Mountain area, and western Simi Hills in the boundary addition. These areas serve as important regional wildlife corridors and were also part of Alternative D in the draft study/EA.

Public Concern: Alternative C should include the western Santa Susana Mountains, including the Rim of the Valley trail connection to Happy Camp.

Response: The western Santa Susana Mountains area is not included in the selected alternative. However, the NPS could provide technical assistance in exploring potential trail alignments in this area, if the selected alternative were implemented.

Public Concern: The boundary addition should include the upper Santa Clara River and wildlife connections to the Angeles National Forest.

Response: Although the upper Santa Clara River area has not been included in the selected alternative, if implemented, the NPS could work through existing authorities to explore opportunities for cooperative conservation.

Public Concern: The alternatives should include the Angeles National Forest lands and a proposed transfer of this area from USFS to NPS.

Response: The NPS determined that USFS-managed lands in the Angeles National Forest were not feasible for addition to the Santa Monica Mountains National Recreation Area.

Public Concern: Lands between San Fernando Valley and Santa Clarita/Acton should be included in the Rim of Valley study area. Without inclusion, there could be significant impacts from the proposed bullet train.

Response: Where authorized by Congress, these areas were evaluated in the special resource study. However, only those areas that meet NPS criteria for boundary adjustment may be included in a final recommendation. The selected alternative includes some of these areas.

Public Concern: Only the portions hashed and marked "essential connectivity areas" should be considered for additional protection. The vast majority of the land considered under this proposal is already protected by the USFS, the SMMC, private conservation easements, parkland status, or highly restrictive local hillside zoning ordinances that effectively prevent building.

Response: The NPS study found that although other agencies and organizations would provide some level of protection under current conditions, a boundary adjustment would provide NPS with the widest range of conservation tools and authorities. These tools include direct land conservation by the NPS to protect the broader ecosystem and funding to provide facilities that support recreation and public enjoyment. Many of the agencies that currently manage land for conservation and recreation within the proposed boundary adjustment have supported including these lands within the boundary of SMMNRA.

Other Alternatives

Public Concern: The NPS should recommend Alternative C, but with the cooperative conservation partnership authority of Alternative B (linkages).

Response: The selected alternative is a hybrid of alternatives C and D, including cooperative conservation. The selected alternative incorporates the language pertaining to the cooperative conservation areas as proposed in alternatives B and D in the draft study/EA. This language emphasizes that the NPS would use existing authorities to pursue voluntary cooperative conservation of critical habitat linkages outside of the proposed boundary addition. This authority need not be limited to a specific location.

Public Concern: The NPS should consider a new alternative that adds all of the Los Angeles River tributaries to Alternative D. These areas have high value as wildlife corridors, for water flow and quality, and to provide access to recreation and nature for underserved populations.

Response: The boundaries of the selected alternative do not extend beyond the area that Congress

intended the NPS to study or beyond areas that have been vetted by the public in previous public engagement periods for this study. In such areas where there are opportunities to provide recreational connections to surrounding urban communities, the NPS would work through existing authorities and partnerships to provide such connections. If vacant or underutilized lands adjacent to the urban river corridors were to become available for restoration to provide habitat or recreational opportunities, the NPS could pursue minor boundary adjustments where appropriate. As stated in the selected alternative the NPS could work through existing authorities to look at recreational and habitat connections for tributaries that extend beyond the proposed boundary.

Other Comments on the Boundary Adjustment Alternatives

Public Concerns: The following comments have been grouped together because they pertain to specific actions more related to implementation of a boundary addition to SMMRNA.

- Specific suggestions for trail use and trailhead locations that could be implemented under Alternative C included: 1) equestrian and hiking trails would be more appropriate in remote sensitive habitat, and geologically unique areas such as Chatsworth; 2) link the Rim of the Valley Trail to the Interagency SMMNRA Visitor Center at King Gillette Ranch; 3) the NPS should construct parking trailheads at least every 10 miles so that senior citizens can do five mile trips in both directions; 4) implementation should include coordination with home and landowners regarding passing through on the Rim of the Valley Trail; 5) the Rim of the Valley Trail should be extended to include the Conejo Valley; and 6) it is important to include a feasible Rim of the Valley Trail option as well as the best possible habitat linkage.
- Comments suggesting priority areas for management should a boundary adjustment be established by Congress included: 1) Implementation should establish future funding for creating recreational opportunities near urban areas as a priority. Second in priority would be protection of regional wildlife corridors; 2) high priority should be given to expanding parks close to the core urban areas that are readily accessible to the Metro and other public transportation; and 3) priority land acquisition should be given to areas between Chatsworth Nature Preserve, Santa Susana Pass State Historic Park, Runkle Ranch, and other existing parklands to make connections.
- The boundary adjustment areas should not allow motorized vehicles in protected areas.
- The boundary adjustment should continue to provide areas that allow dogs on leash.
- Suggest that Alternative D include the reintroduction of species (especially keystone species and predators) that were historically present to balance the ecosystem and reduce diseases (e.g. Lyme disease).
- In Alternative D, land acquisition and cooperative conservation should focus primarily on habitat connectivity, cultural, geological, and historical resources.
- Within Alternative D, many of the wildlife corridors are crossed by major roads or freeways, therefore bridges may need to be built for wildlife. This will require the support of Caltrans.
- Alternative D should focus on urban hillside wildlands and watersheds like those at Debs Park over a focus on solely on the Los Angeles River.
- Alternative D is preferred, but should be managed as two separate districts.
- Comments recommended specific implementation actions related to education and outreach. Comments including: 1) Alternative D should emphasize school trips for children; 2) Alternative D should emphasize education interpretive signs, video, hands on workshops, and schools/churches/youth groups working on projects and restoration of land; and 3) the NPS should think of creative ways to expand access and recreation including welcoming interpretive centers that reflect the region's diversity, shuttles, and technological advances.
- Institutionalize Transit to Trails to increase access to public parklands.
- Alternative D should include cost saving measures.

Response: These comments address issues that pertain to detailed future management actions that are beyond the scope of the study. If Congress were to implement a boundary addition, the NPS would complete implementation plans that would identify trail alignments, transportation opportunities, land acquisition priorities, interpretive and educational opportunities, cost implications, resource management objectives, and appropriate recreational opportunities. Property and home owners, other agencies and organizations would be engaged in implementation planning.

Public Concern: Why does Alternative D preclude land acquisition outside of the study area? Why establish that constraint now?

Response: Unless otherwise authorized in legislation, national park units can only acquire lands within an authorized boundary. Additional areas could be added to the boundary at a later date where appropriate should those areas meet NPS requirements for a minor boundary adjustment (usually areas directly adjacent to existing park lands).

Other Designations Suggested in the Public Comments

Public Concern: The Santa Susana Field Laboratory NASA property should be designated as a National Monument.

Response: Designation of a national monument is a separate federal action at the discretion of the President of the United States under the authority of the Antiquities Act of 1906 or can be created by Congress through legislation, the same way that Congress would create or expand a national park or national recreation area.

The Santa Susana Field Laboratory property is included in the proposed SMMNRA boundary addition in the selected alternative.

Public concern: Alternative D should be a separate unit of the national park system. Santa Monica Mountains National Recreation Area (within its existing boundary) should also be designated as Santa Monica Mountains and Seashore National Park.

Response: The NPS found that a boundary addition to SMMNRA was a more feasible option for NPS management. Many of the significant resources within the study area augment the national significance of SMMNRA and provide habitat connectivity essential for long-term preservation of the significant resources within the Santa Monica Mountains and Simi Hills, thus warranting physical connection to SMMNRA and/or a seamless, collaborative management approach.

The NPS recognizes that a change in the SMMNRA boundary may suggest a change in its designation name. However, this would be at the discretion of Congress.

Environmental Assessment

Need for an EIS

Public Concern: An EIS is needed to fully analyze the socioeconomic costs and benefits of designating tens of thousands of acres as an addition to SMMNRA and for developing the Rim of the Valley Trail which would affect air, water and wildlife.

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.

Cumulative Impacts

Public Concern: Provide information regarding the effects of the alternatives on:

- Newhall Ranch Development
- Canyon Hills Development
- Upper Browns Canyon/Hidden Creeks Estates
- Canyon Park Homes/Big Tujunga Canyon
- Rose Bowl Operating Company/Arroyo Seco
- Scholl Canyon landfill

Response: Because the study area is so large and because much of it is close to developed areas, some specific development proposals were not listed by name in the cumulative effects section or in other corresponding sections of the document (such as in Related Plans and Studies). Instead, these development proposals were referred to collectively. If the area was designated by Congress, private lands proposed for development would continue to be under the jurisdiction of local authorities.

Public Concern: Provide information regarding the effects of the alternatives on high speed rail.

Response: Because at this there is no selected route for high speed rail, the specific impacts cannot be analyzed at this point in time. Additional information about the project and potential routes has been included in the *Errata* for the draft study/EA. If the boundary addition was designated by Congress, lands owned and managed by local, state, and other federal jurisdictions would continue to be managed under those authorities.

Impacts on Traffic

Public Concern: Although the EA acknowledges that there would be changes in access and transportation related to more public use and the expansion of public lands, it does not conclude whether these would adversely affect traffic.

Response: On page 316, the EA notes that dispersal of visitors to new areas could improve traffic conditions in some places. It goes on to state, however, that the overall “because of continued growth

and visitors looking for new places to go, that this would not be discernible given regional traffic patterns and trends” and that conditions attributed to the park would remain minor and adverse with some beneficial effects. Under cumulative effects, the analysis notes that “documentation of traffic impacts is widespread in the region” and “that predictions in the GMP identified level of service reductions (more traffic/longer waits) on most major roads in the SMMNRA.”

Future site specific environmental impact analysis related to specific proposals would likely also conclude that there would continue to be adverse impacts on area traffic from visitor transportation and access to park sites, but that these would generally not be discernible, except in the case of special events hosted on park lands, given existing regional traffic conditions.

Public Concern: There would be adverse effects on transportation and access related to commercial vehicle access in the boundary expansion area from NPS regulations which prohibit commercial vehicles from using government roads without a permit within park areas, when such use is not connected with the park's operation. Superintendents may also place more restrictions on commercial vehicles.

Response: NPS regulations do not pertain to private property access; unless such access must cross NPS-managed land. NPS will allow access when access is the landowner's right by law or by deed reservation (NPS *Management Policies* 2006, 8.6.5).

As stated in the alternatives, SMMNRA is cooperatively managed area that includes public and private lands. Existing roads in the proposed boundary adjustment area are both publicly- and privately-owned. Since NPS land acquisition would be limited, completed over time, and from willing sellers, it would likely have a negligible impact on the existing use of commercial vehicles on roads within the proposed boundary addition area.

Climate Change

Public Concern: There should be additional discussion of the effects of climate change in the study report, in particular the effects of climate change on water resources. The NPS should also address more clearly the impact of climate change on people, and on low income communities and communities of color in particular.

Response: The NPS considers climate change to be one of the greatest challenges facing parks today, and is committed to mitigating and adapting to its impacts. The study considers numerous topics related to climate change, including the effect of climate change on species movement and the need for connected open spaces (chapters 1, 2, and 6), opportunities in the study area to both study and mitigate climate change (chapters 3, 4, 5, and 6), potential climate change impacts to species, habitat, water resources, and fire regimes (chapters 2, 4, 6, and appendices), and existing NPS programs related to climate change (chapters 2, 4, 6). In particular, the impact of climate change on water resources is addressed as part of the description of existing resource degradation and threats (new park unit feasibility) on page 196, though it was omitted from the environmental consequences chapter. For clarity, this has been added to the water resources cumulative impacts on page 292 (see *Errata* for the draft study/EA).

Although the study addresses climate change as it relates to study objectives, a comprehensive analysis of climate change on urban populations is beyond the scope of this study. As described in Chapter 1, purpose and need, the study looked at four primary issues related to the protection and enjoyment of resources in the study area: resource protection, habitat connectivity, recreational access, and regional

coordination. The actions proposed as part of the selected or other alternatives are unlikely to have a discernable impact on the effects of climate change in urban areas.

Effects on Recreation Use and Visitor Experience

Public Concern: The proposed boundary addition, if enacted by Congress, may delay the completion of the SMMNRA interagency trail management plan.

Response: The SMMNRA interagency trail management plan is currently underway and is scheduled for completion in the next few years. A reissued federal Notice of Intent to prepare an EIS was published in the Federal Register on January 31, 2014. A boundary addition would not delay completion of the planning effort.

Public Concern: Expansion of SMMNRA may adversely affect hang gliding and paragliding where it has been practiced for four decades in the Angeles National Forest. NPS regulations prohibit operation of aircraft on lands governed by the NPS (36 CFR, Section 2.17(a)). A ban on hang gliding should be avoided for areas where this has been practiced for nearly half a century. The NPS should promulgate special regulations to allow this use or amend Section 2.17 to clarify the term “aircraft” to specific that it does not apply to hang gliders and paragliders. Locations in the San Gabriel Mountains in the Angeles National Forest are the last remaining hang gliding launch sites. There are precious few hang gliding launch and landing sites left. A site in Trancas Canyon was lost when SMMNRA was expanded in 1990.

Response: The alternatives do not include any U.S. Forest Service (USFS) managed lands in a boundary adjustment for SMMNRA. Management and ownership of the Angeles National Forest and San Gabriel Mountains National Monument would be maintained in all alternatives and USFS policies would continue to be applied to management of these lands (draft study/EA, page 232). For other sites used for hang gliding in the proposed boundary adjustment, NPS management policies related to recreational use would only apply to land federally-owned under NPS jurisdiction. A privately-owned landing site would not be subject to NPS regulations. However, if the NPS were to purchase land with existing launch or landing sites, service wide regulations addressing hang gliding would require that special park specific regulations be developed before these uses may be allowed in the national recreation area. If such regulations were passed, the NPS could establish a permitting system to allow this use.

Public Concern: Expansion of SMMNRA may adversely affect the ability of recreational target shooting venues to operate.

Response: No Angeles National Forest lands are in the selected alternative. The ANF would continue to be managed by the USFS. For shooting ranges located on other public or private land, any recreation uses would continue to be regulated by local and state agencies or other federal authorities that have jurisdiction in the area. As within the SMMNRA boundary, the NPS would only consider acquiring land on a limited basis from willing sellers within an expanded NRA boundary and NPS regulations would only apply to federally-owned lands under NPS jurisdiction.

Public Concern: The boundary addition may affect the ability of miners to prospect in open and unclaimed land.

Response: The selected alternative does not include any federal public lands that are open to mineral prospecting.

Effects on Water Resources

Public Concern: Page 290 of the EA should cite the amended water quality objective for REC-1, which uses *E. coli* rather than fecal coliform for this beneficial use. The bacteria water quality objective in the Los Angeles Regional Board's Basin Plan for the water contact recreation beneficial use (REC-1) in fresh water, the water quality objective has been amended and information on this can be found at http://63.199.216.6/bpa/docs/R10-005_RB_BPA.pdf and http://63.199.216.6/bpa/docs/R10-005_RB_RSL.pdf.

Response: Page 290 has been modified to include this information. See *Errata* for the draft study/EA.

Effects on Biological Resources

Public Concern: Public recreational use in or near oil field lands could require installation of fencing in the Santa Susana Mountains Special Ecological Area, which could impede wildlife movement in the area.

Response: The study alternatives discuss general ways to improve and enhance recreational opportunities in the study area, such as facility improvements or new trails. If the recommendations described in the study are enacted by Congress, specific locations for trail alignments would continue to be determined by existing agencies and landowners 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.

Public Concern: There is no discussion of the benefits of grazing in the study analysis. Studies show that well managed cattle grazing may enhance the environment, rehabilitate grasslands, and complement wildlife management efforts. Grasslands maintained and stimulated by grazing can sequester carbon, retain water, and reduce erosion, among other benefits.

Response: The draft study/EA recognizes the important role of private land stewardship in the conservation of resources in the study area. On page 234 of the study report, the No Action Alternative description states, "Many of the study area's privately owned lands, whether small urban green spaces or large ranches, provide valuable habitat for wildlife." Each of the action alternatives also acknowledges that private land stewardship would continue to play an important role in conservation efforts (see sections on non-governmental organization and private land stewardship on pages 242, 250, and 256). There are no public grazing lands within the proposed boundary addition in the selected alternative.

Public Concern: No consideration was given to the environmental and economic impacts of the reduction and removal of cattle grazing from the study area.

Response: The study alternatives, including the selected alternative, state that, "Local ordinances would continue to determine appropriate uses for private lands. Private land stewardship actions would continue to be voluntary on the part of the landowner." With the exception of solid waste facilities and certain mineral operations, the NPS only has the authority to directly regulate lands under NPS ownership/management. No changes in the management of private grazing lands are proposed in the selected alternative or would be conferred by including the areas in a boundary adjustment.

Socioeconomic Effects

Public Concern: Because the study does not disclose the extensive oil and gas operations within the study area, it inadequately analyzes the socioeconomic impacts of NPS oil and gas regulations from a potential boundary addition. Specific concerns identified include:

- Inability of oil and gas operators to access their sites until they file and receive approval of a plan of operations (which would serve as the operators access permit).
- Concern that existing oil and gas operators could have their operations plans rejected.
- Lost production and jobs and other adverse impacts to oil and gas operations.
- Inability to evaluate and develop additional oil and gas fields in the boundary expansion area because of NPS regulations governing nonfederal oil and gas rights.

Response: In developing the selected alternative for the final study report, the NPS consulted with District 2 of the California Department of Conservation, Division of Oil, Gas & Geothermal Resources as well as NPS regulatory specialists. Additional information on oil and gas operations within the study area has been added to the *Errata* for the draft study /EA (see *Errata* for page 41).

The selected alternative also excludes those areas with the highest concentrations of existing oil and gas operations. Only those areas with the most significant resource values have been retained.

Regulation of oil and gas operations by the National Park Service would not prevent access to valid existing mineral rights. As stated in 36 CFR, Part 1, Section 9B, NPS regulations of nonfederal oil and gas leasing are designed to ensure that activities undertaken pursuant to these rights are “conducted in a manner consistent with the purposes for which the National Park System and each unit thereof were created, to prevent or minimize damage to the environment and other resource values, and to ensure to the extent feasible that all units of the National Park System are left unimpaired for the enjoyment of future generations.” These regulations are not intended to result in the taking of a property interest, but rather to impose reasonable regulations on activities which involve and affect federally-owned lands.

In the national park system there are over 500 active oil and gas wells in 12 national park units. About 40% of those operators are regulated under 36 CFR, Chapter 1, Part 9B which requires operators to obtain NPS approval of their plan of operations. The remaining 60% of these operators fall outside of the scope of the regulations.

It should also be noted that nonfederal oil and gas leasing is typically subject to state and local laws, ordinances, and rules, and that the NPS would continue its longstanding practice of working with all other permitting entities to reduce duplication and maximize efficiencies. Operators with existing state or local permits would continue to be able to access their sites.

Public Concern: Expand the discussion of socioeconomic impacts to include: the need for small, minority, women, and veteran-owned enterprises to enjoy economic benefits, and the need to avoid displacement and gentrification.

Response: The alternatives examined in the special resource study would not affect small, minority, women, and veteran-owned enterprises or displacement and gentrification, so this topic is not evaluated in the draft study/EA.

Public Concern: Impacts on future television and motion picture production should be clearly identified and specifically listed.

Response: Motion picture filming currently takes place in the Santa Monica Mountains National Recreation Area. The national recreation area has played a significant role in film history and this is acknowledged in the national recreation area's purpose and significance statements. Television and motion picture production would continue to be allowed on NPS lands with a commercial use authorization. There would be no effect on television and film productions on privately-owned lands or lands under state or local jurisdiction.

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

Regulatory Authorities - General

Public Concern: Identify NPS policies related to ridgeline viewsheds in the special resource study and how these compare to California Coastal Commission policies.

Response: There are no specific NPS guidelines related to ridgeline viewsheds in SMMNRA. With the approval of the *Malibu Local Coastal Plan*, California Coastal Commission policies now take into account ridgelines and viewsheds in assessing the impacts from proposed development in that area. The plan area includes unincorporated areas of the Santa Monica Mountains within the coastal zone (much of the SMMNRA). The plan has both significant adopted and proposed ridgelines identified for protection.

Public Concern: Local public agencies will use the Rim of Valley Corridor designation to impose additional regulations on privately owned properties adjacent to public lands. For example, there are indirect effects of locating public land adjacent to private property, such as special assessments, including special taxes and special brush clearance requirements.

Response: As mentioned on page 286 of the environmental assessment in the draft study/EA, local public jurisdictions may use the designation of a boundary adjustment for the SMMNRA as an opportunity to protect other areas. Because, however, it is unknown what restrictions or development constraints might be placed on adjacent private property, it is difficult to provide more than a general analysis of the effects of designating additional public lands in the study area. There are no proposals for a boundary buffer zone in the study report and none currently exist for the SMMNRA.

Water Supply, Wastewater, Flood Protection Operations and Facilities/Other Infrastructure and Rights-of-Way

Public Concern: The study does not address the impacts of the proposed expansion on existing water rights, surface water runoff, flood control, and stormwater runoff conservation (replenishment) activities, and flood control water conservation facility operations and maintenance activities. Because these are not listed in the study, it is unclear why the alternatives will not impact these.

Response: The study acknowledges that the greater Los Angeles metropolitan region has highly complex systems of public infrastructure including facilities to transport and store local and regional water supplies, manage flood protection, treat wastewater, and convey power (electricity). None of the alternatives 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/EA, page 233).

Public Concern: Several public utilities expressed concern that the alternatives may affect infrastructure and right-of-ways related to electrical and telecommunications and water supply. The comments requested that the NPS protect and preserve these land use authorizations in final recommendations.

Response: The selected alternative has been revised to acknowledge the need for public utilities in a complex urban area such as the greater Los Angeles Metropolitan region. The NPS also added information about these facilities (as provided in public comments) to the *Errata* for the draft study/EA (see *Errata* page 185). Determination of specific language that would accompany any future legislation regarding a boundary addition for SMMNRA, however, remains under the purview of Congress.

It should be noted that NPS policies related to rights-of-way only pertain to federally-owned lands under NPS jurisdiction. The proposed boundary addition contains private, state, and locally-owned lands (with some parcels federally-owned and managed by the U.S. Army Corps of Engineers) and therefore NPS policies and guidelines would not pertain to these lands.

It is not the intent of NPS to acquire all of the land in the proposed boundary addition, but to manage lands cooperatively with existing private, state and local entities. NPS land acquisition would likely take place over time in small increments as funding is available or if lands are donated to the NPS. Priorities for land acquisition would be determined through implementation plans. Permits would only be required on NPS managed lands. NPS would work with the permittees on a case-by-case basis according to existing laws and NPS *Management Policies* 2006 including: 36 CFR, Part 14, Director's Order 53: *Special Park Uses*, and NPS *Management Policies* 2006, Section 8.6.4.

Agriculture and Grazing

Public Concern: The boundary adjustment may affect existing agricultural operations such as leases for tenant farmers.

Response: The study alternatives, including the selected alternative, state that, "Local ordinances would continue to determine appropriate uses for private lands". With the exception of solid waste facilities and certain mineral operations, the NPS only has the authority to directly regulate lands under NPS ownership/management.

Public Concern: The study did not analyze the cumulative effects of urban sprawl on grazing.

Response: Although the conversion of grazing lands to urban development within and outside the study area is indeed an issue, none of the proposals considered in the study would affect the level of conversion of grazing lands to urban areas. The study outlines many existing private, local, and state programs that contribute to protection of agricultural lands in the alternatives descriptions.

Landfills/Solid Waste

Public Concern: Because landfills are included in the boundary modifications, they would be subject to burdensome NPS regulations. These increased regulations could lead to additional impacts on the environment if they resulted in the closure of the landfills and/or reduced ability to use them and the consequent need to truck waste elsewhere. The socioeconomic impact analysis related to solid waste

operations did not include an annual cost estimate for studies, permits, changes in operations.

Response: Active landfills and other solid waste facilities have been specifically excluded from the boundary adjustment recommendation in the selected alternative. The NPS has sought to identify those areas that would be affected by existing regulations.

Public Concern: Landfills are identified in the Rim of the Valley Study and they are included within the boundaries of the Rim of the Valley Corridor (Alternative C [NPS Preferred Alternative]). Will the National Park Service be liable should barriers in the Scholl Canyon Landfill (eastern Glendale, northeast of Eagle Rock, south of Pasadena) be breached during a seismic event? The barriers partially constrain the westward flow of toxic waste into the aquifer and water wells for Glendale and the Los Angeles River aquifer. There are no “backup” barriers in place should the current barriers be breached.

Response: Active landfills and other solid waste facilities have been excluded from the boundary adjustment recommendation in the selected alternative.

Mineral Rights and Operations

Public Concern: The inclusion of properties with active mineral operations (such as aggregate mining) would be the equivalent of a taking.

Response: Inclusion of active aggregate mining operations in a boundary adjustment would not constitute a taking. Valid existing rights are not affected simply by inclusion of areas within a national park boundary. If the lands subject to future mining operations are privately-owned, then the NPS permits and regulations would not generally apply, unless such activities required access on or across federally-owned lands. If access was required, some regulations may apply in order to minimize adverse impacts on the federal lands and visitors.

Private Property Rights

Public Concern: Recreational opportunities near private lands may affect private property and certain existing land uses such as agriculture and oil and gas operations. Specific concerns include:

- Recreational activities around and near industrial and oil extraction operations could be hazardous to public safety, damaging to the environment, and/or create an opportunity for vandalism.
- Effects on ranchers, cattle ranches, and grazing lands may result from trail and trailhead access, trail use, off-trail impacts, vehicle traffic, cattle disturbance, off-leash dog harassment of livestock, off-leash dogs spooking horses, closed gates left open, and illegal uses, including trespassing and vandalism (graffiti, poaching, theft, cut fences, and fires).

Response: The NPS recognizes that there may be locations with the proposed boundary adjustment that are not appropriate for future trails and public access. Future trail locations and trail design would be considered in collaboration with other agencies and landowners.

Consultation and Coordination

Public Concern: A plan and budget should be prepared for the protection of cultural and archeological resources and sites, which will suffer an increased risk for vandalism, looting, and accidental disturbance as a result of the project.

Response: If a boundary adjustment to SMMNRA was implemented by Congress, the National Park

Service would complete appropriate documentation and planning documents as required for the protection of cultural resources in NPS *Management Policies* 2006, Director's Order 28: *Cultural Resources Management*, Director's Order 28A: *Archeology; Native American Graves Protection and Repatriation Act*, and *The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation*.

Public Concern: Tataviam should be consulted by any agency seeking to produce or modify cultural, archaeological, or historical programs or displays associated with traditional Tataviam territory as a result of the project. Such activities include, but are not limited to, archaeological surveys, geological surveys, excavation, grading, coring, trenching, and removal of deep rooted vegetation, such as oak trees.

Response: If a boundary adjustment to SMMNRA was implemented by Congress, the National Park Service would consult with the Fernandeño Tataviam Band of Mission Indians and other tribal organizations regarding any projects that may affect resources associated with the traditional Tataviam territory. Consultation may be either formal, as when it is required pursuant to the Section 106 of the National Historic Preservation Act or the Native American Graves Protection and Repatriation Act, or informal, when there is not a statutory requirement.

Public Concern: Was the California Department of Conservation, Division of Oil and Gas consulted as part of the study process, with regard to the oil and gas resources in the area?

Response: The study cites information from the California Department of Conservation, Division of Oil and Gas regarding resources in the study area. Following the public comment period, the NPS also contacted District 2 of the California Department of Conservation, Division of Oil and Gas to discuss oil and gas resources in the area.

Appendix A: List of Agencies and Organizations Commenting

Organizations (90)

- Aerospace Contamination Museum of Education
- Amigos de los Rios
- Arroyo Seco Foundation
- Asian Pacific Policy and Planning Council
- Asian and Pacific Islander Obesity Prevention Alliance
- Audubon Center at Debs Park
- Arroyos and Foothills Conservancy
- BikeSGV
- Brentwood Hills Homeowners Association
- Cahuenga Pass Property Owners Association
- California Association for Health, Physical Education, Recreation and Dance
- California Independent Petroleum Association
- California League of Conservation Voters
- California Native Plant Society, Santa Monica Mountains Chapter
- California Native Plant Society, San Gabriel Mountains Chapter
- California Wilderness Coalition
- Chatsworth Nature Preserve Coalition
- Chinese American Citizens Alliance - Los Angeles
- Citizens for Los Angeles Wildlife (CLAW)
- The City Project
- Committee to Bridge the Gap
- Community Hiking Club
- Concerned Citizens of South Central Los Angeles
- Concerned Off-Road Bicyclists Association
- Conejo Oak Tree Advocates
- Consumer Watchdog
- CORE Advocacy for Nuclear & Aerospace Workers
- Crescenta Valley Community Association
- Federation of Hillside and Canyon Associations, Inc.
- Forest Lawn Memorial-Park Association
- Foundation for the Preservation of the Santa Susana Mountains
- Friends of Griffith Park
- Friends of Los Angeles River
- Glendale Homeowners Coordinating Council
- Glenoaks Canyon Homeowners Association
- Hispanics Enjoying Camping, Hunting, and the Outdoors (HECHO)
- Human Synergy
- Jean-Michel Cousteau's Ocean Futures Society
- Kagel Canyon Civic Association
- LA River Revitalization Corporation
- LA River Expeditions
- Las Virgenes Homeowners Federation
- Latino Coalition for a Healthy California (LCHC)
- Los Angeles Audubon Society

- Los Angeles Conservation Corps
- Los Angeles Kayak Club
- Los Angeles Wilderness Training
- Los Encinos Docent Association
- Los Feliz Improvement Association
- Los Padres Forest Watch
- Montrose/Verdugo City/Sparr Heights Neighborhood Association
- Mountains Conservancy Foundation
- Mountainlands Conservancy, LLC and Wilderness Conservation Foundation
- Mountains Restoration Trust
- Mujeres de la Tierra
- National Parks Conservation Association
- Natural Resources Defense Council
- New Mexico Environmental Law Center
- Oaks Homeowners Association
- Old Agoura Homeowners Association
- Outpost Homeowners Association
- Pacoima Beautiful
- Palisades Preservation Association
- Pasadena Audubon Society
- Pasadena Bait Club
- Physicians for Social Responsibility Los Angeles
- Poison Free Malibu
- Poverty & Race Research Action Council
- Public Lands for the People, Inc.
- Rocketdyne Cleanup Coalition
- San Fernando Valley Audubon Society
- San Gabriel Mountains Forever
- Santa Clara River Watershed Conservancy
- Santa Clara Valley Historical Society
- Santa Susana Field Laboratory Community Advisory Group
- Santa Susana Mountain Park Association
- Save Coldwater Canyon
- Save Open Space/Santa Monica Mountains
- Save Porter Ranch
- Sierra Club Angeles Chapter
- Sierra Club - Los Padres Chapter
- Sierra Club - San Fernando Valley
- Social and Public Art Resource Center
- Sylmar Hang Gliding Association, Inc.
- Teens Against Toxins
- The Nature Conservancy
- Trust for Public Land
- United States Hang Gliding and Paragliding Association
- Ventura County Cattlemen's Association
- Ventura County Coalition of Labor, Agriculture, and Business
- WE ACT for Environmental Justice

Professional Societies (2)

- California State Park Rangers Association
- Society of Organic Architects

Local Governments (14)

- Agua Dulce Town Council
- City of Agoura Hills
- City of Burbank
- City of Calabasas
- City of Glendale
- City of Los Angeles
- City of Moorpark
- City of Pasadena
- City of Santa Clarita
- City of Thousand Oaks
- Conejo Open Space Conservation Agency
- Conejo Recreation and Parks District
- Santa Clarita Watershed Recreation and Conservation Authority
- Van Nuys Neighborhood Council

County Government (6)

- County of Los Angeles, County Sanitation Districts
- County of Los Angeles, Department of Parks and Recreation
- County of Los Angeles, Department of Public Works
- County of Los Angeles, Department of Regional Planning
- County of Ventura, Board of Supervisors
- County of Ventura, Resource Management Agency Planning Division

Water Districts and Agencies (3)

- Los Angeles Department of Water and Power
- Metropolitan Water District of Southern California
- Raymond Basin Management Board

Regional and State Agencies (5)

- California High Speed Rail Authority
- California Regional Water Quality Control Board, Los Angeles
- California State Parks, Angeles District
- Resource Conservation District of the Santa Monica Mountains
- Santa Monica Mountains Conservancy

Elected Officials (12)

- California State Senator, Fran Pavley
- City of Los Angeles, Mayor Eric Garcetti
- City of Los Angeles, Councilmember David E. Ryu
- County of Ventura Board of Supervisors, Peter C Foy
- Los Angeles County Board of Supervisors, Sheila Kuehl

- United States Representative, Xavier Becerra
- United States Representative, Judy Chu
- United States Representative, Tony Cardenas
- United States Representative, Ted Lieu
- United States Representative, Lucille Roybal-Allard
- United States Representative, Adam Schiff
- United States Representative, Brad Sherman

Businesses (11)

- California Resources Corporation
- Chevron
- Diamond W Cattle Company
- LT-WR, LLC
- P.W. Gillibrand Co., Inc.
- Southern California Edison
- The Enoteca LLC
- The Newhall Land and Farming Company
- The Termo Company
- Waste Management of California, Inc.

Tribes (2)

- Fernandeño Tataviam Band of Mission Indians
- Santa Ynez Band of Chumash Indians

Appendix B: Comments with Recommendations for Future Legislation that Would Expand Santa Monica Mountains National Recreation Area

A number of commenters suggested that specific language be included in any legislation that may result in implementing study recommendations. The following is a summary of the suggestions made. If Congress introduces legislation as a result of this study, it is within their discretion to determine whether to incorporate any specific language.

Note: To the extent possible, the commenter's own wording has been retained. Comment sources are available upon request. Including the language in this document should not be considered as a recommendation by the National Park Service. This is provided for informational purposes only.

Commenters' Suggested Language pertaining to Oil and Gas Operations

The NPS and the Secretary of the Interior should ensure that any proposed legislation that would authorize any portion of the Study Area to be included in the SMMNRA also protect access to private oil and gas mineral rights in the area.

We would encourage the NPS and Congress to include language ensuring that any adoption Act would provide for the continued and adequate access to non-federally owned land or mineral interests within the Area in respect of long-standing legal protections of private mineral and surface rights.

At a minimum, given the location of such extensive and productive mineral resources in and near the Study Area, the Study should recommend that mineral owners be allowed to continue to exercise their right to access mineral resources. This right has been recognized in other federal public land conservation laws, including the California Desert Protection Act of 1994 ("CDPA") and the Alaska National Interest Lands Conservation Act ("ANILCA"). (10)

The Secretary shall provide adequate access to non-federally owned land or interests in land within the boundaries of the conservation units and wilderness areas designated by this Act which will provide the owner of such land or interest the reasonable use and enjoyment thereof.

Commenters' Suggested Language pertaining to Local Land Use Authorities

Specific language should be included which states that the Rim of the Valley legislation shall not alter any of the existing zoning or development regulations that presently govern properties within its boundaries.

Commenters' Suggested Language pertaining to Private Property and Eminent Domain

I request that any Rim of the Valley regulations specifically prohibit the use of eminent domain for acquiring properties or any trail easements.

Any final Rim of the Valley regulations should specifically prohibit the use of eminent domain for the acquisition of properties or any property rights including, but not limited to, any trail easements. The Rim of the Valley documents produced thus far by the National Park Service specifically state that it is the policy of the Park Service to only acquire property from willing sellers. While I appreciate and applaud that policy, this does not ensure that eminent domain will not be used in the future. I therefore request that any final regulations include specific

language that prohibits the use of eminent domain for both the acquisition of properties as well as for any easements or other property rights.

Commenters' Suggested Language pertaining to Water Rights and Water Supply Facilities and Infrastructure

WATER RIGHTS; WATER RESOURCE FACILITIES; PUBLIC ROADS

(a) No Effect on Water Rights.--Nothing in the Boundary Adjustments to incorporate the Rim of the Valley Corridor into the NPS.

(1) shall affect the use or allocation, in existence on the date of the enactment of this Act, of any water, water right, or interest in water (including potable, recycled, reclaimed, waste, imported, exported, banked, stored water, surface water, groundwater, and public trust interests);

(2) shall affect any public or private contract in existence on the date of the enactment of this Act for the sale, lease, or loan of any water (including potable, recycled, reclaimed, waste, imported, exported, banked, stored water, surface water and groundwater);

(3) shall be considered to be a relinquishment or reduction of any water rights reserved or appropriated by the United States in the State on or before the date of the enactment of this Act;

(4) authorizes or imposes any new reserved Federal water rights or expands water usage pursuant to any existing Federal reserved riparian or appropriative rights.

(5) shall be considered to be a relinquishment or reduction of any water rights (including potable, recycled, reclaimed, waste, imported, exported, banked, stored water, surface water and groundwater) held, reserved or appropriated by any public entity, or other person or entities, on or before the date of the enactment of this Act.

(6) shall be construed to, or shall interfere or conflict with the exercise of the powers or duties of any watermaster, public agency, or other body or entity responsible for groundwater or surface water management or groundwater replenishment as designated or established pursuant to any adjudication, or Federal or State statute including, without limitation, the management of the San Gabriel River watershed and basin, to provide water supply and other environmental benefits as described in (i) the Southwestern Willow Flycatcher Management Plan San Gabriel River – Morris Reservoir to Santa Fe Dam dated September 2012; or (ii) the Long-Term Management Plan: West Fork San Gabriel River dated May 8, 1989, prepared by USDA Forest Service, California Department of Fish and Game and other stakeholders. Notwithstanding any other law, no action by any person to implement or carry out this Act in any portion of the San Gabriel River subject to the management plans referred to in subsections (i) and (ii) above shall be subject to section 1536 or section 1538 (a) of Title 16 United States Code.

(7) shall be construed to, or shall interfere or conflict with any provision of any judgment or court order issued, or rule or regulation adopted, pursuant to any adjudication affecting water, water rights or water management in the San Gabriel River or Lytle Creek watersheds and basins.

(8) shall be construed to impede or adversely impact any previously adopted Los Angeles County Drainage Area project, as described in the report of the Chief of Engineers dated June 30, 1992, including any supplement or addendum to that report, or any maintenance agreement to operate the project.

(9) shall interfere or conflict with any action by a watermaster or public agency that is authorized pursuant to Federal or State statute, water right or adjudication, including, but not limited to, actions relating to water conservation, water quality, surface water diversion or impoundment, groundwater recharge, water treatment, conservation or storage of water, pollution, waste discharge, the pumping of groundwater; the spreading, injection, pumping, storage, or the use of water from local sources, storm water flows, and runoff, or from imported or recycled water, that is undertaken in connection with the management or regulation of the San Gabriel River or Lytle Creek watersheds and groundwater basins.

(10) shall interfere with, obstruct, hinder, or delay the exercise of, or access to, any water right by the owner of a public water system, or other person or entity, including, but not limited to, the construction,

operation, maintenance, replacement, repair, location, or relocation of any well; pipeline; or water pumping, treatment, diversion, impoundment, or storage facility; or other facility or property necessary or useful to access any water right or operate any public water system.

(11) As used in this section, "adjudication" means any final judgment, order, ruling, or decree entered in any judicial proceeding adjudicating or affecting water rights, surface water management, or groundwater management.

The proposed project must not restrict any of [Metropolitan Water District of Southern California]'s day-to-day operation and/or facilities access. Metropolitan requests that NPS expressly exclude Metropolitan's facilities and related rights-of-way from the Project site, and include express language reserving Metropolitan's and other public agencies' right to conduct necessary maintenance and repairs of their facilities within the Project site, especially where the facilities are providing an essential public service, like the supply of drinking water.

Commenters' Suggested Language Pertaining to Solid Waste Facilities, Flood Protection Facilities, Treatment of Water and Wastewater

The study should recommend 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. This includes exemption from 16 U.S.C. § 4601-22(c) (prohibition of solid waste disposal operations in national parks) for existing solid waste facilities and operations, such as landfills and transfer stations.

Commenters' Suggested Language Pertaining Telecommunications and Electrical Infrastructure

Southern California Edison (SCE) requests the National Park Service Project team include provisions in the final EA and report to protect and preserve land use authorization for electrical and telecommunications infrastructure similar to that proposed for the water supply, flood protection, and sanitation infrastructure facilities and functions. SCE also requests that the National Park Service Project team work with SCE to ensure these provisions are included in draft legislation if either Alternative C or D is adopted.

Commenters' Suggested Language Pertaining to Hang Gliding

These lands should not be governed under NPS regulations" if 36 CFR §2.17(a) would be applied to prohibit the sport of hang gliding and paragliding on those lands. A National Recreation Area should not discriminate against the sport of hang gliding and paragliding. There is no reason why 36 CFR §2.17 (a) is necessary or desirable to prohibit the sport of hang gliding or paragliding in the San Gabriel or Santa Monica Mountains. Any enabling legislation or regulatory changes should exempt the sport of hang gliding and paragliding from that prohibition on these lands.