



P.O. Box 711

Pasadena, California

91102

October 13, 2016

Justin Seastrand
Environmental Coordinator
Angeles National Forest
701 North Santa Anita Avenue
Arcadia, CA 91006

Re: San Gabriel Mountains National Monument Plan and Land Management Plan Amendment #46964

Dear Mr. Seastrand:

This letter transmits the comments of Pasadena Casting Club (PCC) on the San Gabriel Mountains National Monument Plan and Land Management Plan Amendment #46964 published on August 16, 2016. The Pasadena Casting Club, founded in 1947, is a 300-member family oriented fly fishing organization, with a long history of supporting conservation of our local wild trout streams. We have a stake in the management direction, strategy, and priorities that are laid out in the National Monument plan and environmental assessment. Here we articulate our concerns about several areas of the plan that affect the fishery and recommend changes.

Purpose of the Monument Plan

"The management plan does not include specific project and activity decisions." We feel the plan is inadequate in this respect. The management plans of other national monuments do include stated objectives and timelines. The SGMNM plan is broad in scope and ambitious in goals, but without objectives and timelines it risks remaining a high-level assessment of problems, but without solutions.

Mining

We are pleased that the documents explicitly recognizes that all mining activity, other than currently permitted sand and gravel mining, is prohibited and should be stopped, and also that this may need to be accomplished through the use of law enforcement measures. However, there is no specific language about either increased law enforcement, or how those engaged in illegal mining will be cited. Because the Forest Service lacks appropriate citations to use when responding to illegal mining, including so-called recreational mining, it should use the authority granted to the Secretary of Agriculture, and residing with the Regional Forester, to promulgate the necessary citations. In our view the 1928 Act withdrawing ANF from the Mining Act clearly gave the USFS and the Secretary of Agriculture the option to promulgate and cite for mining infractions since Congress was then silent as to mining in ANF. Contained within the powers granted to the Secretary of Agriculture by Congress is the authority to manage these public lands.

Critical Biological Land Use Zones

We note that Critical Biological Land Use Zones have been extended to include portions of the North and East forks of the San Gabriel River. Recent genetics studies have found that the purest populations of remnant southern California coastal steelhead are found in the headwaters of the San Gabriel (Jacobson et al, 2014). These populations should be managed as an at-risk species and the waters in which they are found should be included in the Critical Biological Land Use Zones. We believe the Land Use Zone boundaries of the West, North, and East forks of the San Gabriel River should be evaluated to ensure they are inclusive of the reaches in which these remnant populations were discovered in the Jacobson study. Detailed maps of these zones should then be published.

Wild and Scenic Rivers

The waters in the Monument declared eligible for Wild and Scenic River designation are Little Rock Creek, San Antonio Creek, and the West, North, and East forks of the San Gabriel River. A timeline for the initiation and completion of the requisite suitability studies should be specified in the Monument plan. The suitability study for the lower West Fork San Gabriel River should determine the best way to operate Cogswell Dam to sustain threatened native fish and provide high quality fishing and other recreational opportunities downstream. In the interim, there should be declared a Wild and Scenic River Land Use Zone for each of these eligible waters.

Recreation: West Fork TMDL

The Total Maximum Daily Load for Trash on the West Fork SGR requires a management strategy to bring it into compliance with the state regulations.

Visitor and Carrying Capacity Studies

While capacity studies are mentioned positively in the EA and Plan, a timeframe for their completion should be specified.

Together with other stakeholders, we look forward to working with Angeles National Forest staff in bringing the SGMNM Management plan forward, and to helping to achieve the goals of the Proclamation.

Sincerely,



Leigh Ann Swanson
President
Pasadena Casting Club



John Tobin
Conservation Chair
Pasadena Casting Club