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August 26, 2022

Submitted electronically via website

Deputy Forest Supervisor Thomas Torres

ATTN: Piru Creek CRMP

Angeles National Forest

701 North Santa Anita Avenue

Arcadia, California 91006

Subject: United Water Conservation District's comments on the River Values Assessment for Piru Creek Wild and Scenic River

Dear Mr. Torres,

United Water Conservation District (United) submits the following comments regarding the draft River Values Assessment for Piru Creek Wild and Scenic River (Draft Assessment). United is a California Special District which owns and operates the Santa Felicia Dam, licensed by the Federal Energy Regulatory Commission (FERC, Project No. 2153), on Piru Creek directly downstream of the Draft Assessment's evaluation area. United has a contractual right to receive State Water Project (SWP) water released from Pyramid Dam that flows through the designated Wild and Scenic Rivers Act reaches on Piru Creek (hereafter, designated reaches), in accordance with the FERC license issued for Pyramid Dam and the South SWP Hydropower (No. 2426). United submits one general comment and three specific comments regarding the Draft Assessment, in the order in which the items appear in context of the Draft Assessment:

General Comment

United recognizes the free flow, water quality, and outstandingly remarkable values present within Piru Creek, and supports the existing Wild and Recreational designations. We understand that further evaluation will occur during the development of the Comprehensive River Management Plan (CRMP). Piru Creek is the sole conduit for United to receive SWP water into Lake Piru, which provides significant water resource conservation value to both human and environmental beneficial uses within the Santa Clara River valley and the Oxnard Plain. Notably, Santa Felicia Dam which forms Lake Piru was the first dam built solely to recharge groundwater and United's efforts throughout our service boundary have proven successful in combating seawater intrusion, protecting water quality in groundwater aquifers, and meeting our environmental obligations. United is actively investigating opportunities to increase the amount of SWP water that can be delivered via Piru Creek in a manner that would not adversely affect other sensitive resources of the watershed. United urges that the development of the CRMP account for the water resource value of these deliveries and that United's ability to take such deliveries to enhance local groundwater conditions are not hindered.



Specific Comments

Sixth paragraph of the “Wildlife – Baseline and Present Conditions” section (page 14) states:

The federally endangered California red-legged frog (Rana aurora draytonji) [sic] occurs primarily downstream of and not within the designated portion of Piru Creek (CDWR, 2019b).

This statement omits additional relevant information that is included in the cited source¹ (and elsewhere). Specifically, the most recent known detection of California red-legged frog (CRLF) within Piru Creek was in 2005² (more than two (2) miles downstream of the designated reaches) and annual surveys conducted downstream of the designated reaches of Piru Creek, since 2010, have not documented CRLF. Surveys met most of the CRLF presence/absence survey conditions, excluding non-breeding season surveys.

First paragraph of the “Free Flow” section (page 17) states:

The license allows for limited exceptions for emergency flood protection and other testing, and delivery of water to United Water Conservation District Lake Piru in the winter months (November to February) when flows would not interfere with arroyo toad reproduction. Pyramid Dam is unique because this large volume of water can be released out of the reservoir down the canal rather than into Piru Creek, directly.

This statement is factually incorrect in that these large volumes of water are released directly into Piru Creek and not into a canal. No canal exists downstream of Pyramid Dam. The natural stream channel of Piru Creek is the only conduit for United to receive its deliveries of SWP water from Pyramid Dam, which are conducted between November 1 to the end of February in accordance with Article 52 of the South SWP Hydropower FERC license (Project No. 2426). Furthermore, this statement represents a fundamental misunderstanding of the physical condition of Piru Creek and Pyramid Dam. If this misunderstanding was a significant factor considered within the original Eligibility Study³ in determining whether the recreational and wild reaches of Piru Creek are suitable additions to the National Wild and Scenic River System, then the original Eligibility Study (and the resulting Forest Plan Record of Decisions^{4,5}) is fundamentally flawed. However, our review of the Eligibility Study results contained no reference to a canal downstream of Pyramid Dam.

¹ California Department of Water Resources (CDWR) and Los Angeles Department of Water and Power (LADWP). 2019. Federal Energy Regulatory Commission Project No. 2426, South SWP Hydropower Study. ESA Listed Amphibian Species Study. <http://south-swp-hydropower-relicensing.com/studies/> (accessed August 12, 2022)

² CDWR and LADWP. 2020. South SWP Hydropower Relicensing, FERC Project No. 2426. Initial Study/ Mitigated Negative Declaration. March 2021.

³ U.S. Department of Agriculture, Forest Service. 2005. Southern California Forests Land Management Plans Final Environmental Impact Statement, Volume 2, Appendix E – Wild and Scenic Rivers. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5320706.pdf (accessed August 12, 2022).

⁴ U.S. Department of Agriculture, Forest Service. 2006a. Southern California Forests Land Management Plans, Angeles National Forest Record of Decision. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5313167.pdf (accessed August 12, 2022).

⁵ U.S. Department of Agriculture, Forest Service. 2006b. Southern California Forests Land Management Plans Los Padres National Forest Record of Decision. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5337803.pdf (accessed August 12, 2022).



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Second paragraph of the “Free Flow” section (page 17):

The Draft Assessment reports a maximum discharge of 779.5 cfs in February 1988. The data available online⁶ begin in October 1988 (i.e., do not include February 1988) and include numerous measurements greater than 779.5 (e.g., maximum of 6,000 cfs on February 23, 1998). It appears that the Draft Assessment may be reporting the monthly mean for February 1998. Regardless, use of a monthly mean oversimplifies the flashy nature of Piru Creek hydrology. Flow within Piru Creek can change significantly over the course of hours. United recommends using hourly or, at minimum, daily averages (in the absence of finer scale data) to characterize flows. Additionally, USGS Stream Gage 11109550 Piru Creek Above Frenchman’s Flat is situated approximately 1.5 miles downstream of the Pyramid Dam outlet and is within the designated recreational reach. Data from this Stream Gage would more accurately characterize peak flow within the designated reaches. For example, USGS Stream Gage 11109550 recorded a maximum discharge of 11,500 cfs on February 21, 2005.

Second paragraph of the “Free Flow” section (page 17) states:

Winter discharge rates increase in very wet winters when the dam operators are [sic] release large amounts of water to make room for additional storage anticipated for March and April rainfalls in the northern portions [sic] of California.

Releases of this nature do not occur within the current operational regime at Pyramid Dam. As described in the preceding paragraph of the Draft Assessment, releases at Pyramid Dam are conducted in a manner to “match outflows from Pyramid Lake to natural inflows to Pyramid Lake.” Winter discharge rates do increase during wet winters, but as a response to increased natural inflow into the lake (or as a delivery of SWP water to United), not to create storage capacity within the lake.

Thank you for the opportunity to participate in the CRMP development process.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Anthony A. Emmert'.

Anthony A. Emmert
Assistant General Manager

EL/ae

⁶ https://waterdata.usgs.gov/nwis/inventory?site_no=11109525&agency_cd=USGS (accessed August 12, 2022)