

August 26th, 2022

Thomas A. Torres
Deputy Forest Supervisor
Angeles National Forest
701 North Santa Anita Avenue
Arcadia, Ca 91006-2725

RE: River Values Assessment for Piru Creek Wild and Scenic River

Deputy Forest Supervisor Torres,

California Trout, Inc. (CalTrout) appreciates the opportunity to provide comments on the National Forest Service – Angeles and Los Padres National Forests (FS) River Values Assessment draft. CalTrout's Ventura Office is currently leading two large watershed restoration projects in the Santa Clara River watershed and serves as the Santa Clara River Steelhead Coalition Coordinator. Our efforts focus on recovering a resilient Southern California steelhead (*Oncorhynchus mykiss*) population in the Santa Clara River basin. At the population level, CalTrout is leading the effort to list Southern steelhead as endangered under the California Endangered Species Act (CESA).

On the whole, CalTrout is pursuing a watershed scale restoration program to affect population level impact for Southern steelhead. As a part of this, it essential that any agency resource planning policy restore critical ecosystem function and integrity at the largest scale possible. The River Values Assessment is an excellent opportunity to achieve these goals. It could help foster a more robust community understanding of the extinction threat this species is facing, the role this sub-watershed plays in the continued existence of this species and the conservation steps necessary to avoid an irreversible loss of this keystone species.

The National Marine Fisheries Service (NMFS) identifies the Santa Clara River watershed as a stronghold for Southern steelhead and prioritized for restoration activities by the federal recovery plan (NMFS 2012). The Piru Creek sub-basin is central to these recovery goals for the sub-population in the Santa Clara River watershed and for the species continued existence as a whole.

The Piru basin population of *O.mykiss* retains invaluable life-history attributes that will be vital to this species survival. The majority of the Piru basin is inaccessible to upstream migration due to the presence of two major dams without fish passage facilities. In the shadow of these structure after 50-plus years of reproduction isolation, the population of resident rainbow trout in the Piru watershed are still nearly genetically identical to their downstream neighbors. They continue to pass down genetic material likely central to full anadromy in spite of the inability to access the ocean and then return to their natal system.

O. mykiss face accelerating degradation of available remaining suitable habitat imposed upon them by climate crisis and the lasting legacy of urban development in the region. The resident rainbow trout hold on to the hope at the genetic level that one day they will be fully connected to the ocean and able to complete this impressive journey. In the face of these obstacles, that is priceless.

The Piru Creek *O.mykiss* population exists in the farthest flung corner of a large watershed in comparison to other sub-populations in Southern California. They survived for eons in seasonal disconnected habitats that experience higher daily average temperatures that their more coastal and northern brethren. This innate ability to persist in higher water temperatures is insanely unique, increasingly rare and beyond remarkable. Climate crisis forecast for this region suggest that this adaptability will be vital for their survival in a harsher climate

future. Sub-populations of *O. mykiss*, like those in the Piru basin, will be able to provide genetic material to neighboring watersheds to support a more resilient population going forward.

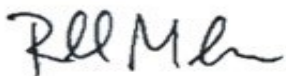
CalTrout is in full agreement with the assessment that the Wilderness Section fishery is remarkable. CalTrout feels the FS evaluation should be extended into the Recreation reach as well. This entire reach could provide better habitat and be recolonized by *O. mykiss* with full restoration of ecologically functional flows and management of aquatic invasive species in this area. This would help to re-establish instream processes, reduce the known adverse impacts of non-native species on *O. mykiss* and support a healthier and more resilient resident rainbow population for the entire assessed reach.

The designation of the entire reach assessed as remarkable would be consistent with CalTrout's principal recommendation put forward as part of our CESA petition. We recommended that all *O. mykiss* in waters below natural or man-made barriers be given full protection under CESA. We specifically chose this delineation to ensure Southern Californians have access to fishing opportunities in our backyards. There is no better place for the community to learn the key role *O. mykiss* play to total ecosystem health than stream side enjoying amazing catch and release rivers like Piru Creek. Fishing is a gateway to a greater understanding of the rivers we depend on to thrive as a society and the actions we can take to protect and conserve their value.

We acknowledge the constraints placed on the FS to perform this assessment but with this stretch of river bookended by two major dams, labeling this section of Piru Creek as "free flowing" is tenuous at best. This stands in particular contrast to the findings on the value of this fishery as remarkable. That conclusion is supported in part by the known presence of the *O. mykiss* genetic material likely indicating the ability to express anadromy. Accepting this section of Piru Creek as "free-flowing" would be short sighted, if that designation is carried through by the FS into the larger Comprehensive River Management Plan. The remarkable nature of the fish present here is contingent on their innate genetic ability to utilize the ocean if given the opportunity. That we could value the ability to express this life history trajectory, but not provide the pathway for it to occur seems incongruent. The FS, as land manager for the majority of the Piru watershed, must be a leading voice for advancing plans to restore connectivity to the ocean for Southern steelhead in the Piru basin.

In the past 25 years, only 177 adult Southern steelhead have been observed. We must adopt resource plans that focus on process-based management to protect native species while also promoting public stewardship of the environment. These are vital conservation actions that must be maximized for scope and scale. Please see this River Value Assessment as an opportunity to advance these goals.

Respectfully,



Russell Marlow
CalTrout – Senior Project Manager, Ventura
Santa Clara River Steelhead Coalition Coordinator