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August 30, 2022

Mr. Justin Seastrand
Angeles National Forest
701 N. Santa Anita Avenue
Arcadia, CA 91006

Mr. Michael Papa
Los Padres National Forest
1980 Old Mission Drive
Solvang, CA 93463

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

Dear Mr. Seastrand and Mr. Papa:

Thank you for inviting public comment in response to the River Values Assessment for Piru Creek Wild and Scenic River (Assessment). American Whitewater and the undersigned avid whitewater paddlers provide the following comments.

Many of us participated in the 2019-2020 controlled flow whitewater boating study conducted by the California Department of Water Resources and the Los Angeles Department of Water & Power under the auspices of the FERC relicensing of the South State Water Project hydroelectric license No. 2426-227. This study confirmed that there are two distinct whitewater runs below Pyramid Dam.¹ There is a 3-mile reach that offers excellent play and teaching resources, accessible put-ins, and take-outs. There is also the 15-mile “wilderness” run below Frenchman’s Flat which flows through the geologic faults and rock formations that are identified as an Outstandingly Remarkable Value for the Wild & Scenic Piru Creek.

We are astonished that the River Values Assessment for Piru Creek concludes that “Recreational values on Piru Creek WSR are not considered outstandingly remarkable.” We are particularly concerned about the Assessment’s evaluation of whitewater boating on Piru Creek and its findings, which include:

- “Whitewater boating is constrained due to flows and challenging topography and vegetation.” – While it’s true that chronic drought has reduced opportunities to run Piru

¹ FERC Project No. 2426-227 – South SWP Hydropower – Filing of Whitewater Boating Level 3 Controlled-Flow Boating Report, eLibrary no. 20200403-5124



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Creek in the past, the whitewater flow study proves that State Water Project releases can be regulated in terms of timing and amount to provide a few days of whitewater boating when the United Water Conservation District (UWCD) contract is fulfilled, in addition to the occasional high-water year when sufficient flows are naturally provided. Challenging topography creates the whitewater we seek and the fact that vegetation can be a constraint is just a fact of boating life associated with the smaller whitewater streams in California (and in particular, southern California).

- “Lack of egress and the technical nature of its rapids further limits these opportunities to experts.” – It is documented in the whitewater study that the 3-mile reach directly below Pyramid Dam is easily accessible for multiple runs in a day. Additionally, lack of easy egress to Piru Creek on the 15-mile reach is simply the nature of the creek’s wilderness run – it should be considered an attractive recreation value instead of a constraint. Piru Creek’s rapids are less technical than other designated and eligible Wild and Scenic Rivers in California that offer more challenging runs limited to boating experts (NF Kern/Forks of the Kern class IV-V, Kings Canyon Run class V, North Yuba River multiple runs class IV-V+). And yet the whitewater recreation values of these eligible and designated Wild and Scenic Rivers have been officially recognized by the Forest Service.

The Assessment then concludes that “There are other boating opportunities that are similarly constrained within the region of comparison.” While we agree that many streams in southern California suffer from too little water (for safe boating) and difficult access, this somewhat confusing statement ignores the fact that Piru Creek is unique in southern California in terms of providing a reliable and outstanding whitewater recreation experience less than an hour outside of Los Angeles.

The whitewater boating flow study confirmed that regulating the timing and amount of water released into Piru Creek to fulfill the downstream UWCD contract can provide a few precious days a year for whitewater boating in a region that otherwise offers little to no such activity. And the opportunities for whitewater boating on Piru Creek will increase during wetter years.

Piru Creek’s unique whitewater opportunities will be enhanced by the Forest Service’s Preliminary Terms and Conditions, and Recommendations for the operation of Pyramid Dam. This document specifies that up to six days of water will be released on weekends, from Nov. 1 through Feb. 28, depending on the water release requirements of the given year. This will provide up to six weekend days of optimum boating flows (300 CFS) in Piru Creek downstream of Pyramid Dam. Regularly scheduled boatable flows in Piru Creek will undoubtedly attract visitors from the region and beyond, as it has done on the North Fork Feather River.



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Outdoor photographer and kayaker Gary Valle perhaps best describes Piru Creek's unique whitewater boating opportunities:

Add water and the reach between Pyramid dam and Lake Piru becomes one of the most unique, isolated, and scenic one-day, road accessible, whitewater runs in the Western U.S. It is considered a "must do" classic by many expert whitewater kayakers...Overall, there are many stretches of moderate class II-III water, but there are also many class IV rapids and at least one gnarly, backed class V-VI hole. This feature is found downstream of the "Falls" gorge, in an area of large Eocene era conglomerate boulders...Part of the appeal of this reach is its isolation. More than 10 miles of the creek is totally wild and cannot be accessed by road or maintained trail. Hiking in or out is a formidable task. Such wilderness is rare in Southern California. Rarer still is the special combination of wildness and natural wonder found here.²

No other stream in Los Angeles, Ventura, Orange, San Bernardino, San Diego, and Riverside Counties can provide this unique whitewater boating opportunity, except Piru Creek. While Sespe Creek, Little Rock Creek, and other streams in the region can provide expert whitewater boating opportunities during wet years, Piru Creek is the only stream in the region that will offer expert whitewater boating on a reliably scheduled basis.

We urge the Forest Service to recognize whitewater boating on Piru Creek downstream of Pyramid Dam as an outstandingly remarkable recreation value, to be protected and enhanced.

Thank you,

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² <https://www.sierraphotography.com/creeking/piru02.htm>



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