



Submitted via email and [website](#)

August 30, 2022

Angeles National Forest,
701 North Santa Anita Avenue
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ATTN: Piru Creek CRMP
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RE: Comments on the Piru River Resource Assessment

To whom it concerns,

Thank you for the opportunity to submit comments on the Piru River Resource Assessment (Assessment). The assessment is incomplete in evaluating the Outstanding Remarkable Values (ORVs) in several areas. Including all the ORVs in the assessment is important because it is the basis for developing the Comprehensive River Management Plan (CRMP) [emphasis added].

The lack of identification of ORVs for scenery, wildlife and botany conflicts with the available data and determinations for these ORVs as discussed below.

Scenery

The Evaluation Criteria require

“The landscape elements of landform, vegetation, water, color, and related factors result in notable or exemplary visual features and/or attractions”
(at pg. 7).

In this arid area, the landscape element of water and the riparian vegetation it supports amidst more arid adapted vegetation provides a “ribbon of green” in an otherwise arid landscape - a notable visual feature/attraction. The steep walled canyon (landform) that Piru flows through is also a notable visual feature.

The determination also recognizes these values stating:

“The presence of water in such relatively dry, steep topography does offer some scenic attractiveness, especially in the wild segment of Piru Creek” and

“rock formations along the canyon in the wild segment are rare and visually interesting”
(At pg. 7)

Because these features occur within the Wild and Scenic Corridor designation in both the recreational and wild sections, ORVs must be updated to include Scenery in both Wild and Recreational reaches of Piru Creek.

Wildlife

The Evaluation Criteria require:

Wildlife values may be judged on the relative merits of either terrestrial or aquatic wildlife populations or habitat, or a combination of these conditions.

- **Habitat.** The river, or area within the river corridor, provides uniquely diverse or high-quality habitat for wildlife of national or regional significance, and/or may provide unique habitat or a critical link in habitat conditions for federal or state-listed or candidate threatened, endangered species, or species of conservation concern. Contiguous habitat conditions are such that the biological needs of the species are met.
- **Populations.** The river, or area within the river corridor, contains nationally or regionally important populations of indigenous wildlife species. Of particular significance are species diversity, species considered to be unique, and/or populations of federal or state-listed or candidate threatened or endangered species, or species of conservation concern.
(at pg. 14)

The Assessment fails to include the following species of conservation concern which are State Species of Special Concern¹ that have been documented to occur within the Wild and Scenic corridor:

- Foothill yellow legged frog (*Rana boylei*) – occurrences documented in both the Recreational and Wild reaches;
- Coast horned lizard (*Phrynosoma blainvillii*) – occurrences documented in both the Recreational and Wild reaches;

The Present Conditions notes the presence of Forest Service sensitive species including the striped garter snake (*Thamnophis hamondii*) and southern Pacific pond turtle (*Actinemys marmorata pallida*) within the Wild and Scenic corridor (at pg. 13). Both species are State Species of Special Concern. The Present Conditions also recognizes that federally designated Critical Habitat occurs within the Wild and Scenic corridor for both the southwestern willow flycatcher, which relies on riparian vegetation for successful reproduction, and the California condor. While these Critical Habitat areas may not currently have documented occurrences of these species, Critical Habitat is designated to provide habitat for recovery of threatened and endangered species. The Present Conditions also states that arroyo toad Critical Habitat is designated ½ mile downstream of the Wild and Scenic corridor (at pg. 13) – a distance that arroyo toads can easily travel, because arroyo toads have been documented to travel up to 2

¹ CNDDDB 2022

miles from breeding pools.² The Present Conditions also note that the federally endangered least Bell's vireo has potential to occur within the Wild and Scenic corridor (at pg. 14). The presence of four species of conservation concern (Forest Service sensitive species and/or State Species of Special Concern) within the Wild and Scenic corridor meets both the habitat and population criteria to qualify as a wildlife ORV. While the federally endangered Southern California DPS of steelhead is addressed in the "Fisheries" section where it is found to be an ORV in the Wild reach of Piru Creek, fish are also wildlife. Therefore, the presence of the federally endangered species should trigger ORV determination in the Wild reach for Wildlife. In addition, two federally designated Critical Habitat units occur in the Wild and Scenic corridor which meets the habitat criteria to qualify as wildlife ORV.

It is unclear how the Determination concludes "There is nothing rare, unique, or exemplary about the wildlife populations or habitat in Piru Creek WSR." (at pg.14) based on the criteria for nationally or regionally (State) important populations and habitat. Instead, the Determination downplays federally designated Critical Habitat, and ignores the Forest Service's documentation of State Species of Special Concern and the State's documentation of two additional Species of Special Concern within the Wild and Scenic corridor. For these reasons, the Assessment needs to revise the ORV for Wildlife to include both the Recreational and Wild reaches.

Botany

The Botany section does not identify the Evaluation Criteria for ORVs designation.

While we agree that the botanical resources are understudied within the Wild and Scenic corridor, a State Sensitive Plant Community – Southern Willow Scrub is located within both the Recreational and Wild reaches of Piru Creek. Its presence is one of the reasons for the designation of Critical Habitat for the southwestern willow flycatcher in the area.

It is unclear how the Determination for Botany ORVs was made based on the lack of criteria. Regardless, the riparian resources including the State Sensitive Plant Community – Southern Willow Scrub – is adequate to elevate Botany to an ORV in both the Recreational and Wild reaches of Piru Creek.

Conclusion

In general, the Determinations for ORVs in the Assessment fail to adequately identify ORVs for Scenery, Wildlife and Botany based on the Evaluation Criteria presented. The final Assessment must include Scenery, Wildlife and Botany as ORV for both Recreational and Wild reaches of Piru Creek.

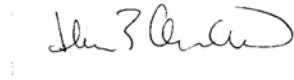
In the subsequent draft CRMP, the Forest Service must accurately evaluate the User Capacity based on the existing use. If an increase in the User Capacity is proposed, the accompanying NEPA document must analyze the potential impacts to resources from the proposed increase.

We also agree with and support the group comments submitted by CalWild and others on August 30, 2022, on this matter.

² USFWS 1999

Please feel free to reach out to us with any questions at the contact information below.

Sincerely,



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References:

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<https://apps.wildlife.ca.gov/myaccount/login?ReturnUrl=%2frarefind%2fview%2fRareFind.aspx>

U.S. Fish and Wildlife Service (USFWS) 1999. Arroyo southwestern toad (*Bufo microscaphus californicus*) recovery plan. U.S. Fish and Wildlife Service, Portland, Oregon. vi + 119 pp.
https://ecos.fws.gov/docs/recovery_plan/990724.pdf