

**DEPARTMENT OF WATER RESOURCES**

P.O. BOX 942836  
SACRAMENTO, CA 94236-0001  
(916) 653-5791



November 25, 2024

*Electronically Filed*

Mr. Justin Seastrand  
Angeles National Forest  
701 North Santa Anita Avenue  
Arcadia, California 91006

FERC Project No. 2426—South SWP Hydropower, Comments on Draft Piru Creek Wild and Scenic River Comprehensive River Management Plan Environmental Assessment

Dear Mr. Seastrand:

The California Department of Water Resources (DWR) is in receipt of the United States Forest Service's (USFS) draft *Piru Creek Wild and Scenic River Comprehensive River Management Plan Environmental Assessment* (EA). The draft EA was prepared to analyze environmental effects of the previously prepared Comprehensive River Management Plan (CRMP) under the National Environmental Policy Act. The CRMP identifies the river values and outstandingly remarkable values within the designated Piru Creek wild and recreation stream segments that would be managed by the USFS. The EA also identifies adaptive management actions and proposed future management actions that would be implemented to protect resources in Piru Creek.

Please find enclosed DWR's comments on this CRMP and draft EA. These comments take into consideration the collaborative coordination between DWR and the USFS for the Federal Energy Regulatory Commission (FERC) relicensing of the South SWP Hydropower, FERC Project No. 2426. Both the CRMP and the FERC license will document approaches for management of the same resources in Piru Creek.

DWR appreciates the dialogue with the USFS on DWR's FERC relicensing, and the opportunity to provide our comments on this CRMP and draft EA.

If you have any questions or would like to discuss this further, please contact me at (916) 699-8414 or your staff may contact James Gleim, Environmental Manager, at (916) 882-2004 or by email at [james.gleim@water.ca.gov](mailto:james.gleim@water.ca.gov).

Sincerely,

*James Cox Jr.*  
Jeremiah McNeil, Manager  
State Water Project Power Compliance Office

Enclosure

| DWR Comments  |  |   |  |
|---------------|--|---|--|
| CRMP Comments |  |   |  |
| Page          | Section                                      | Document Language   | DWR Comment  |
| 8 - 9         | Land Uses and Access in River Corridor       | <p>Pyramid Dam stores water from Pyramid Lake for use in Ventura and Los Angeles counties and is part of the State Water Project, the largest state-owned and operated water supply project in the U.S. The FERC license for this dam expired in January 2022 and at the time of writing, an integrated relicensing process is underway. Even though the dam is located north of the WSR corridor, its use and operations affect water flows in Piru Creek and the subsequent uses throughout the river corridor. Portions of the infrastructure licensed by FERC are within the WSR Corridor. These facilities include access adits into the Pyramid to Castaic tunnel, and the access road to them.</p> | <p>While the existing FERC license expired for South SWP Hydropower, which includes the licensed-facility Pyramid Dam, DWR and LADWP are currently operating under an annual FERC license that maintains the existing license terms and conditions until FERC issues a new license.</p> <p>For clarification purposes, the CRMP refers to the "Pyramid to Castaic tunnel." This tunnel is called the Angeles Tunnel.</p> |
| 11            | Baseline Conditions – Free Flow              | <p>Pyramid Dam impounds Piru Creek directly upstream of the designated segment. Pyramid Dam was constructed by the California Department of Water Resources in the 1960s and completed in 1973 as part of the State Water Project and has a storage capacity of 222,000 acre-feet of water.</p>   | <p>Pyramid Lake has a storage capacity of 161,375 AF. This storage capacity should also be corrected in the EA, page 15.</p>   |
| 11            | Baseline Conditions – Free Flow              | <p>The FERC license for Pyramid Dam includes access adits to the tunnel that is part of the hydroelectric infrastructure, as well as a paved road across Piru Creek to access these adits.</p>  | <p>DWR recommends moving this explanation up to the first mention of the adits, at the top of page 9.</p>  |
| 11, 17 & 23   | Baseline Conditions – Free Flow; Fisheries – | <p>Page 8 states: "a USGS gauging station (locally called "the waterfall") north of Frenchman's Flat."</p>  | <p>The CRMP discusses a nonfunctioning United States Geological Survey (USGS) gage located adjacent the channel spanning concrete "weir" and incorrectly refers to this gage as USGS</p>   |

| DWR Comments |   |   |  |
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|              | Baseline Conditions; Management Actions | <p>Page 11 states: "A review of the streamflow data (1988 to present) from USGS Stream Gauge 1109525 – Piru Creek below Pyramid Lake near Gorman, CA shows high fluctuations in discharge from a high of 779.5 cubic feet per second (cfs) recorded in February 1998 to a low of 1.8 cfs recorded in July 2018."</p> <p>Page 17 states: "The channel spanning weir at the gauging station impedes the free-flowing nature of the river and is likely a fish passage barrier during all flows."</p> <p>Page 22 states: "Work with USGS to consider repair or removal for the stream gauge which is a barrier to fish and other aquatic organisms and may affect free flowing character."</p> | <p>gage 1109525 Piru Creek below Pyramid Lake near Gorman, CA. Gage 11109525 is located immediately below Pyramid Dam (Latitude 34°30'30" N, Longitude 118°45'49" W) and it is owned by DWR. It is likely that the nonfunctioning USGS gage is USGS gage 1109550 Piru Creek Above Frenchmans Flat CA (Latitude 34°37'51" N, Longitude 118°44'51" W).</p>   |
| 16           | Fisheries – Baseline Conditions         | <p>Native fish species such as resident rainbow trout (<i>Oncorhynchus mykiss</i>) and arroyo chub (<i>Gila orcutti</i>), as well as non-native prickly sculpin (<i>Cottus asper</i>), inhabit the designated segments of Piru Creek. A species of sucker has been documented in the wild section of Piru Creek as recently as 2018 (CDWR and LA DWP 2019). Authors of the study were not able to identify these fish to species. <b>The arroyo chub, a Forest Service sensitive species, was introduced into Piru Creek and now is mostly extirpated from its native rivers in Southern California (Moyle 2002).</b></p>   | <p>Arroyo chub identified with the Project vicinity are considered introduced. Language from DWR's Final License Application which was filed with FERC states:</p> <p><i>Arroyo chub (Gila orcutti) and Sacramento hitch (Lavinia exilicauda) are listed as SSC, but they each occur in the Project vicinity <b>only as introduced species outside of their native ranges</b>. The arroyo chub is native to coastal drainages of the Los Angeles plain, where much of its habitat has been lost or degraded by development. There are records of introduced arroyo chub in the Santa Clara River (CDFW 2018b) and Agua Blanca Creek (a tributary of Piru Creek) (USFS 1979).</i></p> |

| DWR Comments |                                  |  |   |
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| 16           | Fisheries – Baseline Conditions  | <p>The initial stream releases were incorporated into Exhibit S (<b>19822</b>) of FERC license P-2426 and were later amended in 1993 to provide constant summer flows at the recommendation of CDFW. In 2005, Pyramid Dam's license requirements (<b>Articles 51 and 52.26</b>) to provide minimum flows for rainbow trout were waived to favor a more natural flow regime that would limit impacts to the federally endangered arroyo toad.</p> | <p>DWR suggests correcting "19822" to 1982, or clarify what 19822 refers to.</p> <p>DWR is unsure what "Article 52.26" refers to. DWR suggests correcting to state "Articles 51 and 52" or clarify what 52.26 refers to. Note that these corrections are also recommended for page 27 of the companion Environmental Assessment.</p>  |
| 20           | Recreation – Baseline Conditions | <p>The California State Water Board adopted an amendment to the Water Quality Certification issued by the State Water Board (SWB) for the relicensing of Pyramid Dam on March 14, 2023. This amendment may increase opportunities for whitewater boating for up to six weekends in the winter season by controlling the timing and rate of flow releases from Pyramid Dam.</p>   | <p>DWR would like to provide the following suggested text (italicized below) to help clarify that the flow releases for whitewater boating are subject to available SWP water supplies being delivered to United Water Conservation District:</p> <p>This amendment may increase opportunities for whitewater boating for up to six weekends in the winter season by controlling the timing and rate of <i>SWP water supply deliveries to United Water Conservation District, which are released in addition to the releases of natural inflow. The deliveries to United Water Conservation District are subject to SWP water supply availability on an annual basis. Whitewater boating opportunities may not be available in all years.</i></p> |
| 23           | Management Actions               | <p>Develop a Road Maintenance Plan with DWR and other partners, including the following:</p> <ul style="list-style-type: none"> <li>• Best Management Practices to reduce sedimentation, enhance safety, and manage woody debris</li> <li>• Evaluation of the DWR adit access road for potential improvements to water quality and aquatic organism passage</li> </ul>   | <p>DWR looks forward to collaborating on a Road Management Plan with the USFS, however a Road Management Plan is not included in DWR's FERC relicensing Protection, Mitigation, and Enhancement measures. A plan of this nature has not been included because the roads the USFS is looking to collaborate on management of near Piru Creek are almost entirely outside DWR's FERC project boundary. The roads in this area have shared uses and are not solely for FERC project use. Therefore,</p>  |

| DWR Comments |                                     |   |   |
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| 24           | Management Actions                  | <ul style="list-style-type: none"> <li>Continue full participation in FERC relicensing for Pyramid and Santa Felicia Dams, in order to implement Federal Power Act conditions for resource protection, including the Road Management Plan.</li> </ul> | collaboration on a Road Management Plan should remain separate from the FERC relicensing process. DWR suggests removing <i>“including the Road Management Plan”</i> from the proposed Management action. DWR appreciates the USFS’s full participation in the FERC relicensing process to date and looks forward to future collaboration.                                     |
| 24           | Potential Future Management Options | Designate Piru Creek as a priority watershed under the Watershed Condition Framework 2 to enhance funding opportunities to improve riparian conditions, fish habitat and water including eliminating or reducing sediment sources.                    | Since the federally endangered arroyo toad utilizes natural sedimentation within the Piru Creek system for its lifecycle, DWR recommends that references to “sediment elimination and reduction” be specific to shoreline and recreation-created erosion.   |
| 25           | Potential Future Management Options | Support National Marine Fisheries Service (NOAA) and United Water in reintroducing Pacific Steelhead to Piru Creek above Santa Felicia Dam; coordinate with California Department of Fish & Wildlife in achieving desired conditions for fisheries.   | This has the potential to further imperil the population of federally endangered arroyo toad present in Piru Creek due to increased predation associated with steelhead and the change in habitat to support steelhead. Consideration must be given to how the reintroduction of steelhead and the change in required habitat may affect the existing arroyo toad population. |
| EA Comments  |                                     |   |   |
| Page         | Section                             | Document Language   | DWR Comment   |
| 10           | Proposed Action                     | Encourage and promote access to the upper segment of the corridor (recreational segment) to geological classes, study groups, field trips, scientific research and the public in general.   | DWR supports access to this area for educational groups. However, DWR is concerned with increased access to the area below Pyramid Dam, especially during periods of high flow which may pose a safety hazard and a potential for increased security risks. DWR would appreciate coordination prior to an educational group visit.  |
| 11, 16 & 27  | Proposed Action                     | Page 11 states “Work with the US Geological Survey (USGS) to consider repair or removal for the stream gauge which is a barrier to fish and other   | The CRMP (page 11) and EA (pages 16 and 27) discusses a nonfunctioning United States Geological Survey (USGS) gage located adjacent the channel spanning concrete “weir” and  |

| DWR Comments |                 |  |  |
|--------------|-----------------|--|--|
|              |                 | <p>aquatic organisms and may affect free flowing character.”</p> <p>Page 16 states “The USGS gauge infrastructure from which these data were taken is damaged, and pieces of the weir have broken loose into the channel. The gaging weir is a impediment to free flow in the channel. The weir is also a grade control that protects the stream bed stability upstream from degrading or downcutting.”</p> <p>Page 27 states “The fishery in the recreational segment of Piru Creek is heavily impacted by the presence of infrastructure including a USGS stream gauging station and dilapidated concrete weir, roads, high recreational use, and a younger aged riparian vegetation since the Day Fire in 2006. The channel spanning weir at the gauging station impedes the free-flowing nature of the river and is likely a fish passage barrier during all flows.”</p> | <p>incorrectly refers to this gage as USGS gage 1109525 Piru Creek below Pyramid Lake near Gorman, CA. Gage 11109525 is located immediately below Pyramid Dam (Latitude 34°30'30" N, Longitude 118°45'49" W) and is owned by DWR. It is likely that the nonfunctioning USGS gage inferred in the EA is USGS gage 1109550 Piru Creek Above Frenchmans Flat CA (Latitude 34°37'51" N, Longitude 118°44'51" W).</p>   |
| 11           | Proposed Action | <p>Continue full participation in FERC relicensing for Pyramid and Santa Felicia Dams, in order to implement Federal Power Act conditions for resource protection, including the Road Management Plan.</p>   | <p>DWR looks forward to collaborating on a Road Management Plan with the USFS, however a Road Management Plan is not included in DWR’s FERC relicensing Protection, Mitigation, and Enhancement measures. A plan of this nature has not been included because the roads the USFS is looking to collaborate on management of near Piru Creek are almost entirely outside DWR’s FERC project boundary. The roads in this area have shared uses and are not solely for FERC project use. Therefore, collaboration on a Road Management Plan should remain separate from the FERC relicensing process. DWR suggests removing “<i>including the Road Management Plan</i>” from the proposed Management action. DWR appreciates the USFS’s</p> |

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|              |                                     |  | full participation in the FERC relicensing process to date and looks forward to future collaboration.   |
| 12           | Potential Future Management Options | Support National Marine Fisheries Service (NOAA) and United Water in reintroducing Pacific Steelhead to Piru Creek above Santa Felicia Dam; coordinate with California Department of Fish & Wildlife in achieving desired conditions for fisheries.  | This has the potential to further imperil the population of federally endangered arroyo toad present in Piru Creek due to increased predation associated with steelhead and the change in habitat to support steelhead. Consideration must be given to how the reintroduction of steelhead and the change in required habitat may affect the existing arroyo toad population.   |
| 27           | Fish – Affected Environment         | Native fish species such as resident rainbow trout ( <i>Oncorhynchus mykiss</i> ) and arroyo chub ( <i>Gila orcutti</i> ), as well as non-native prickly sculpin ( <i>Cottus asper</i> ), inhabit the designated segments of Piru Creek. A species of sucker has been documented in the wild section of Piru Creek as recently as 2018 (CDWR and LA DWP 2019). Authors of the study were not able to identify these fish to species. <b>The arroyo chub, a Forest Service sensitive species, was introduced into Piru Creek and now is mostly extirpated from its native rivers in Southern California</b> (Moyle 2002). | Arroyo chub identified within the Project vicinity are considered introduced. Language from DWR's Final License Application which was filed with FERC states:<br><br><i>Arroyo chub (<i>Gila orcutti</i>) and Sacramento hitch (<i>Lavinia exilicauda</i>) are listed as SSC, but they each occur in the Project vicinity <b>only as introduced species outside of their native ranges</b>. The arroyo chub is native to coastal drainages of the Los Angeles plain, where much of its habitat has been lost or degraded by development. There are records of introduced arroyo chub in the Santa Clara River (CDFW 2018b) and Agua Blanca Creek (a tributary of Piru Creek) (USFS 1979).</i> |
| 31           | Recreation – Affected Environment   | The California State Water Board adopted an amendment to the Water Quality Certification issued by the State Water Board for the relicensing of Pyramid Dam on March 14, 2023. This amendment may increase opportunities for whitewater boating for up to six weekends in the winter season by controlling the timing and rate of flow releases from Pyramid Dam.  | DWR would like to provide the following suggested text (italicized below) to help clarify that the flow releases for whitewater boating are subject to available SWP water supplies being delivered to United Water Conservation District:<br><br><i>This amendment may increase opportunities for whitewater boating for up to six weekends in the winter season by controlling the timing and rate of SWP water supply deliveries to United Water Conservation District, which are released in addition to the releases of natural inflow. The deliveries to</i>  |

## DWR Comments

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|  |  | <p><i>United Water Conservation District are subject to SWP water supply availability on an annual basis. Whitewater boating opportunities may not be available in all years.</i></p> |
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