Scott Harding
Stewardship Associate
scott@americanwhitewater.org
PO Box 34
Forks of Salmon, CA 96031
541.840.1662

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Roman Torres, Forest Supervisor
Angeles National Forest
701 North Santa Anita Avenue
Arcadia, CA 91006-2725

Submitted electronically via https://cara.fs2c.usda.gov/Public//CommentInput?Project=58710

Re: Piru Creek Final Comprehensive River Management Plan and Environmental Assessment

Dear Supervisor Torres:

Thank you for the opportunity to comment on the Piru Creek Wild and Scenic River Final Comprehensive River Management Plan (CRMP) and Environmental Assessment (EA). We appreciate the efforts of the Angeles and Los Padres National Forest staff in preparing these documents and responding to the public input submitted earlier this year on the Draft CRMP.

We respectfully incorporate by reference the comments we submitted on the Draft CRMP on August 30, 2024, and are resubmitting them now to ensure they are included in the NEPA record for this plan.

We acknowledge and commend the substantive responsiveness of the Final CRMP to public feedback, particularly the recognition of the unique and remarkable whitewater boating opportunities in the wilderness section of Piru Creek as an Outstandingly Remarkable Value (ORV).

However, we continue to advocate for the recognition of whitewater boating ORV in the reach upstream of Frenchman's Flat. Our rationale for this designation is detailed in our comments on the Draft CRMP (pages 2-11), and we stand by those points. Additionally, we remain committed to collaborating with the Angeles National Forest to explore solutions that provide boater access to the reach between the first bridge below Pyramid Dam and Frenchman's Flat. We would like to build on the discussions held on-site in April 2024, as public access to and enjoyment of this exceptional whitewater stretch is critically important.

As part of our submission, we are also providing a spreadsheet of flow data from 2007 to April 2024, along with our quantitative analysis. This analysis applies a robust methodology to determine the number of boatable days within this period. While we previously submitted summary results and charts in our comments on the Draft CRMP, we are now submitting the complete dataset to support the Forest Service in replacing the outdated and limited flow information currently presented in the Final CRMP, River Values Assessment, and EA. We welcome the opportunity to discuss our methodology and results in greater detail.

Once again, we appreciate the opportunity to comment on the Final CRMP and recognize the significant effort that has gone into its development. Our comments aim to contribute meaningful improvements that will ensure the plan effectively serves its purpose and fully recognizes the unique values of Piru Creek.

American Whitewater's Comments on the Piru Creek Wild and Scenic River Comprehensive River Management Plan (October 2024)

Comments on Final CRMP

Comment 1: In the section titled Federal Reserved Water Rights (Final CRMP, p. 7), update the language to explicitly include recreation as an Outstandingly Remarkable Value (ORV), alongside the recognized values of fisheries and geology. This ensures consistency with the CRMP's acknowledgment of recreation as an ORV for the wild segment of Piru Creek.

Comment 2: Although Pyramid Dam is located just upstream of the designated Wild and Scenic River (WSR) and outside the WSR corridor, other components of the South State Water Project are situated within the corridor. These include DWR's debris pile, adits, and other physical infrastructure associated with the project. The Land Uses and Access in River Corridor section (Final CRMP, p. 8) should be updated to provide a more comprehensive description of these uses and their presence within the WSR corridor to ensure clarity and completeness.

Comment 3: The USGS gage number referenced on page 11 of the CRMP should be corrected to *11109525*. This most recent monthly streamflow statistics from this gage date to September 2022; therefore this gage can only provide streamflow data up to that date, not to the present as stated in the CRMP. USGS gage 11109550 (Piru C AB Frenchmans Flat CA), also now defunct, provides data through May 1, 2023. The Department of Water Resources' Pyramid Dam outflow gage (PYM) provides data from 2007 to present (available via California Data Exchange Center) .

For consistency, we suggest that DWR's gage be used to characterize flow for the 2007-present time period and that one of the USGS gages be used to characterize flow prior to 2007.

Comment 4: The CRMP uses monthly mean flow values to characterize Piru Creek's streamflow. For a flashy, desert stream like Piru Creek, this approach lacks the detail necessary to describe its highly episodic flow regime. The use of monthly means overlooks high-magnitude, short-duration flow events, which characterize Piru Creek's flow and are critical in shaping the creek's physical setting and supporting its Outstandingly Remarkable Value (ORV) for whitewater recreation. The baseline conditions section should include a detailed discussion of these episodic flows, highlighting their role in creating and sustaining the river's unique attributes. This discussion should specifically address the flow conditions necessary to support whitewater recreation, including an analysis of peak flow events and their frequency, duration, and timing. The Affected Environment section of the EA should be correspondingly updated.

Comment 5: The CRMP's desired conditions in its management direction (Final CRMP, p. 22) notably lack any reference to the recreation ORV for the wild segment. To support this ORV:

1. Creek access at Frenchman's Flat should be managed to allow boaters to launch their craft within a reasonable distance of the parking area. This can align with the broader goal of providing reasonable access to all visitors, not just boaters, and likely requires no special accommodations.
2. Given the unique setting and conditions encountered while whitewater boating on Piru Creek, the desired conditions should include providing adequate information through signage or an information kiosk to enhance visitor preparedness and safety.

Comment 6: The potential future management action related to signage and information should be moved to the Management Actions section. Piru Creek has been a designated Wild and Scenic River (WSR) since March 30, 2009, yet there is still no relevant on-site signage, informational materials, or even an indicator sign to educate the public that Piru Creek is a designated WSR. The development and implementation of a sign plan is more than ripe for analysis and qualifies as minimally ground-disturbing. This action should be prioritized and promoted within the CRMP rather than delayed.

Appropriate signage and an information kiosk at key locations, including Frenchman's Flat, would address multiple management needs. In addition, the kiosk could include a river user registration box to support a recreation monitoring program, further enhancing management effectiveness.

Comment 7: The final CRMP, its River Values Assessment, and the Environmental Assessment (EA) continue to rely on outdated and limited flow data from 2007 to 2017 to characterize boating opportunities on Piru Creek. This is insufficient given the availability of more recent data and analysis.

In our comments on the Draft CRMP, we provided the results of a comprehensive flow analysis that included data from 2007 through early 2024, spanning dry, normal, wet, and very wet years. These updated results offer a more accurate and complete representation of boatable days, a key measure for evaluating whitewater recreational opportunities. Not only does our analysis consider a more recent temporal span with over six years of more recent data, it is much more precise in its methodology which considers both the specific range of flows that support boating, the duration of those flows necessary to complete a trip, and counts only those flows that occur during daylight hours throughout the span of the season.

Our updated analysis demonstrates that Piru Creek's Pyramid Run had between 0 and 67 boatable days per year, and the Wilderness Run had between 0 and 55 boatable days per year between 2008 and April 2024. Boatable days were distributed primarily across the months of January through April, indicating significant seasonal opportunities for whitewater recreation.

To ensure an accurate and informed portrayal of the river's recreational value, the Final CRMP, its River Values Assessment, and EA should:

1. Incorporate the most current and complete flow data (2007–2024) provided by American Whitewater.
2. Recognize boatable days as a key metric for evaluating whitewater recreation opportunities.
3. Highlight the importance of managed flow events in supplementing natural flows to enhance boating opportunities.

American Whitewater is providing a spreadsheet with flow data from 2007 through early 2024, along with the corresponding analysis and graphs, to support the revision of these sections. Using the most current data will ensure the CRMP and related documents accurately reflect the value and potential of Piru Creek as a destination for high-quality whitewater recreation.

Comments on Appendix A: River Values Assessment For Piru Creek Wild and Scenic River

Comment 8: The River Values Assessment (RVA) should reflect that Piru Creek's whitewater recreation ORV is rooted in its natural flow characteristics, with managed releases serving only

to supplement and enhance, but not define, its value. This distinction is critical to accurately documenting and protecting the ORV.

Although future FERC license conditions are expected to result in an increase in boatable days and a more predictable flow regime while DWR is delivering water to United Water Conservation District, the Outstandingly Remarkable Value (ORV) for whitewater boating recreation is merely augmented by these managed releases, not dependent upon them for its existence. Boating opportunities on Piru Creek below Pyramid Dam already exist without these releases, as flows naturally occur that support whitewater recreation. The Final River Values Assessment (page 9) should clearly state this distinction, as it serves as the formal documentation of ORVs and the rationale for their designation.

Comments on Appendix B: User Capacity Analysis for Piru Creek Wild and Scenic River Corridor

Comment 9: The User Capacity Analysis conflates the terms designation and classification in the first paragraph on page 2. To ensure accuracy, the text should be corrected to state:

> "In 2009, Congress designated 7.25 miles of Piru Creek on the Angeles and Los Padres National Forests as a Wild and Scenic River (WSR), with 3 miles classified as recreational and 4.25 miles classified as wild."

This clarification is necessary to accurately reflect the statutory distinction between designation and classification under the Wild and Scenic Rivers Act.

Comment 10: The User Capacity Analysis (page 9) mischaracterizes the effect of Pyramid Dam's presence and management on whitewater recreation in Analysis Area 3 (the wild-classified segment). Under its FERC license, DWR is required to mimic natural flows by passing the flow of Piru Creek, as measured upstream of the dam, through the dam and into the creek downstream. Consequently, the flow in the Wild and Scenic segments of Piru Creek is essentially identical to the natural flow that would occur if the dam did not exist.

Furthermore, the forthcoming new license for the South State Water Project is expected to include conditions allowing for additional boatable flows when DWR makes water deliveries to United Water Conservation District via Piru Creek. While these deliveries augment flows in a manner that enhances whitewater boating opportunities, whitewater recreation on Piru Creek is not dependent on the dam or water deliveries for its occurrence. The flows that sustain the creek and its whitewater recreation ORV are neither diminished by the dam's operation nor

reliant on these water deliveries. Including this clarification in the CRMP ensures an accurate representation of Piru Creek's flow dynamics, highlights the independence of the whitewater recreation ORV from the dam while noting that water deliveries can occasionally support boating opportunities, and informs effective management actions aligned with protecting this ORV.

Comment 11: The User Capacity Analysis (page 9) inaccurately implies that recreational use of Piru Creek by whitewater boaters is limited to weekends. The primary constraint on boating use is the episodic nature of boatable flows, not the day of the week on which they occur. Just as other recreational activities, such as fishing and hiking, take place mid-week, so too does whitewater boating when suitable flows are present. Additionally, the analysis should incorporate more current data to characterize the frequency of boating opportunities, rather than relying solely on data from 2007 to 2017. American Whitewater has provided an updated analysis of boatable days on Piru Creek through April 2024, which indicates a significant increase in the number of days with boatable flows since 2017. This updated data should be included in the analysis to reflect current conditions more accurately.

Comment 12: The User Capacity Analysis overlooks whitewater boating use in the recreational-classified segment upstream of Frenchman's Flat, which should be addressed. While the gated road poses access challenges, this reach is still boated, and usage by boaters is likely to increase due to the advent and proliferation of ultralight, portable boats like packrafts, which facilitate walk-in access for many users. Additionally, whitewater boating on Piru Creek occurs almost exclusively outside the peak season identified for other recreational activities (April through October). This distinction should be detailed in the analysis to provide an accurate understanding of seasonal use patterns.

Comment 13: On page 11, the User Capacity Analysis fails to list recreation as an Outstandingly Remarkable Value (ORV) for the wild-classified segment. This omission should be corrected to align with the designation in the CRMP.

Comment 14: The discussion of Analysis Area 3 in the Capacity Approach section (pages 24-25) should acknowledge that whitewater boating on the wild-classified reach of Piru Creek does not involve the use or creation of formal or informal trails, and therefore the sedimentation impacts attributed to recreational use in this section do not originate from whitewater boating. Additionally, this section should recognize that whitewater boating use primarily occurs between October and May, outside the peak use period for other recreational activities.

Comments on Environmental Assessment

Comment 15: The EA, on page 3, conflates the terms designation and classification in the first paragraph on page 2. To ensure accuracy, the text should be corrected to state:

> "A total of 4.25 miles of the river are classified as wild, and 3 miles are classified as recreational."

This clarification is necessary to accurately reflect the statutory distinction between designation and classification under the Wild and Scenic Rivers Act.

Comment 16: On page 11 of the EA, the acronym OHWM should be defined as "ordinary high water mark" to ensure clarity for all readers and consistency with standard terminology used in hydrology and river management. Providing this explanation will make the document more accessible to a broader audience, including those who may not be familiar with the acronym.

Conclusion

Thank you for considering our comments on the Piru Creek Wild and Scenic River Final Comprehensive River Management Plan and Environmental Assessment. We look forward to continued collaboration with the Forest Service to ensure the effective management and protection of Piru Creek's unique values. Please feel free to reach out if additional information or discussion would be helpful in your review.

Sincerely,

Scott Harding
Stewardship Associate
American Whitewater