March 26, 2024

Submitted electronically via website

Deputy Forest Supervisor Thomas Torres
ATTN: Piru Creek CRMP
Angeles National Forest
701 North Santa Anita Avenue
Arcadia, California 91006

Subject: United Water Conservation District's comments on the Draft Comprehensive River Management Plan for Piru Creek Wild and Scenic River

Dear Mr. Torres,

United Water Conservation District (United) submits the following comments regarding the Draft Comprehensive River Management Plan for Piru Creek Wild and Scenic River (Draft CRMP). United is a California Special District which owns and operates the Santa Felicia Dam, licensed by the Federal Energy Regulatory Commission (FERC, Project No. 2153), on Piru Creek directly downstream of the Draft CRMP's area of interest. United has an appropriative water right with priority date of September 18, 1947, to divert 75,000 acre-feet per year from Piru Creek for surface storage in Lake Piru. United also has a contractual right to receive State Water Project (SWP) water released from Pyramid Dam that flows through the designated Wild and Scenic Rivers Act reaches on Piru Creek, in accordance with the FERC license issued for Pyramid Dam and the South SWP Hydropower (No. 2426). United submits one general comment, two specific suggested revisions, and additional specific comments regarding the Draft CRMP:

General Comment

United recognizes the free flow, water quality, and outstandingly remarkable values present within Piru Creek, and supports the existing Wild and Recreational designations. Piru Creek is the sole conduit for United to receive SWP water into Lake Piru, which provides significant water resource conservation value to both human and environmental beneficial uses within the Santa Clara River valley and the Oxnard Plain. Notably, Santa Felicia Dam, which forms Lake Piru, was the first dam built solely to recharge groundwater. United's groundwater recharge efforts throughout our service boundary have proven successful in combating seawater intrusion, protecting water quality in groundwater aquifers, supporting the regional economy, and meeting our environmental obligations. United is pursuing opportunities to increase the amount of SWP water that can be delivered via Piru Creek in a manner that would not adversely affect sensitive resources of the watershed. United urges that the development of the CRMP account for the water resource value of SWP water deliveries and that United's ability to receive and seek increases to these deliveries for local groundwater recharge efforts are not hindered.

Specific Suggested Revisions

The Draft CRMP makes two statements related to "reintroduction of steelhead into Piru Creek." United assumes these statements are in reference to the possibility of implementing fish passage for Southern California steelhead [steelhead; *Oncorhynchus mykiss*] at or around Santa Felicia Dam and Lake Piru. The term "reintroduction" assumes previous presence and it should be noted that there are no reliable historical records of anadromous steelhead in Piru Creek. The only available historical information regarding the presence of an anadromous adult southern California steelhead in Piru Creek is a single photograph contained in the 2008 National Marine Fisheries Service (NMFS) biological opinion for UWCD's Santa Felicia Project FERC license[1]. A historical review conducted by UWCD indicates that the information attached to this photograph is unreliable (based on a conversation the historian had with the owner of the photograph) and that further anecdotal information from an exhaustive records search indicates that Piru Creek was not a popular destination for anglers[2]. Specific revisions to the two statements in the Draft CRMP are suggested below and the following summary is provided for context in considering United's suggestions regarding those statements in the Draft CRMP.

United is implementing activities associated with the *Santa Felicia Dam Fish Passage Feasibility Assessment Study Plan* (Feasibility Study)[3] in compliance with the license issued to United by FERC for the Santa Felicia Project (FERC No. P-2153) and Reasonable and Prudent Alternative (RPA) 3 of the associated biological opinion issued by NMFS. The Feasibility Study sets the framework for the Santa Felicia Dam Fish Passage Panel, an independent panel of fish passage experts, to assess the technical feasibility of providing fish passage at the Santa Felicia Dam establishes a process for making decisions in consultation with resources agencies, and includes provisions for further assessment of the biological and economic feasibility of panel recommended fish passage alternatives or changing direction to evaluate off-site alternatives in lieu of providing fish passage at the Santa Felicia Project.

RPA 3 of NMFS's biological opinion for the Santa Felicia Project requires United to "provide passage of steelhead at or around Santa Felicia Dam, ***or other suitable alternative to passage***." [emphasis added]. United's pre-implementation study activities for the Santa Felicia Project are currently underway and if fish passage is not found feasible a suitable alternative to passage may result. United therefore recommends revisions to the Draft CRMP to remove conclusive fish passage language to accurately reflect the uncertainty related to the conclusion of this process. Below, United submits suggested revised text, including reference to the original text, to both mentions related to "reintroduction of steelhead into Piru Creek," from pages 19 and 21 of the Draft CRMP.

[1] NMFS. 2008. Final Biological Opinion for the Issuance of a New License to United Water Conservation District for Operations of the Santa Felicia Hydroelectric Project (P-2153-012). May 5, 2008.

[2] Bowers, K. 2008. History of steelhead and rainbow trout in Ventura County: newsprint from 1872 to 1954, volume I, United Water Conservation District, July 10, 2008.

[3] *See* Santa Felicia Dam Fish Passage Panel, Santa Felicia Dam Fish Passage Feasibility Assessment Study Plan (2013): Prepared for the United Water Conservation District, in association with the National Marine Fisheries Service and California Department of Fish and Game.

Page 19, fourth bullet item
Original Text

- Fisheries: Maintain and improve habitat quality for the native population of resident rainbow trout (and other native species) with the long-term goal of supporting reintroduction of Southern California steelhead trout into Piru Creek WSR. Prioritize actions in Piru Creek and tributary drainages that restore fish passage, and benefit and enhance fish habitat and water quality. Maintain a low level of public use and access in the Wild section of Piru Creek.

Suggested Revised Text:

- Fisheries: Maintain and improve habitat quality for the native population of resident rainbow trout (and other native species). Prioritize actions in Piru Creek and tributary drainages that benefit and enhance fish habitat and water quality. Maintain a low level of public use and access in the Wild section of Piru Creek.

Page 21, last bullet item
Original Text

- 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 & Game in achieving desired conditions for fisheries.

Suggested Revised Text

- Coordinate with the California Department of Fish & Wildlife in achieving desired conditions for fisheries.

Additional Specific Comments

Pages 2 and 4, Figures 1 and 2
Fish Creek is incorrectly labelled "Aqua Blanco Creek".

Page 5, first paragraph
One of the largest river systems in the Southern California region, Piru Creek has water year-round (USDA Forest Service 2005b).

There are several reaches of Piru Creek that do not have water year-round; for example, USGS gage Piru Creek Above Lake Piru (11109600) for the period of June-November 2018[4].

Page 14, last paragraph
Native fish species such as resident rainbow trout (Oncorhynchus mykiss), prickly sculpin (Cottus asper), and arroyo chub (Gila orcuttii), inhabit the designated segments of Piru Creek.

Prickly sculpin are not considered native to the Santa Clara River watershed, including Piru Creek[5,6].

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[4] *https://waterdata.usgs.gov/monitoring-location/11109600/#parameterCode=00060&showMedian=true&startDT=2017-07-01&endDT=2020-12-01*. Access Date March 19, 2024
[5] Moyle, P.B. (2002) *Inland Fishes of California*. University of California Press, Oakland.
[6] Pam Fuller, and Matt Neilson, 2024, *Cottus asper* Richardson, 1836: U.S. Geological Survey, Nonindigenous Aquatic Species Database, Gainesville, FL, *https://nas.er.usgs.gov/queries/factsheet.aspx?SpeciesID=501*, Revision Date: 7/18/2016, Peer Review Date: 3/2/2012, Access Date: March 19, 2024

Page 15, second paragraph
Water releases have also introduced several nonnative species from the state water project…

Is there data to suggest that SWP water releases are the source of all these nonnative species? Numerous other potential methods for introduction are possible, including historic translocation by CA Department of Fish and Game [Wildlife] or the public.

…federally endangered arroyo toad (*Bufo californicus*)
The current classification for arroyo toad is *Anaxyrus californicus.*

Thank you for the opportunity to participate in the CRMP development process.

Sincerely,

Anthony A. Emmert
Assistant General Manager

cc: Mauricio E. Guardado, Jr., General Manager, UWCD
Maryam Bral, Ph.D., P.E., Chief Engineer, UWCD
Marissa Caringella, Environmental Services Manager, UWCD
Evan Lashly, Senior Environmental Scientist, UWCD