



PALMDALE WATER DISTRICT
A CENTURY OF SERVICE

March 28, 2024

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

Submitted electronically via website

**RE: COMMENTS ON THE DRAFT COMPREHENSIVE
RIVER MANAGEMENT PLAN FOR PIRU CREEK
WILD AND SCENIC RIVER**

DENNIS D. LaMOREAUX
General Manager

ALESHIRE & WYNDR LLP
Attorneys

Dear Mr. Torres:

Palmdale Water District (District) appreciates the notice and ability to comment on the Draft Comprehensive River Management Plan for Piru Creek Wild and Scenic River (Draft). Though remote from this area, the District is a State Water Project (Project) Contractor and has dealt with the movement of water from the Project through this section of Piru Creek. The District works with Ventura County Watershed Management District and United Water Conservation District (United) to make mutually beneficial exchange agreements with Project water. The continued ability to move Project water through the section is critical for combating seawater intrusion, protecting water quality in groundwater aquifers, supporting the regional economy, and meeting environmental obligations in the Santa Clara River watershed and Oxnard coastal plain.

The Santa Felicia Dam and Lake Piru, owned and operated by United, are crucial to the delivery and timing of Project water use. As stated above, Piru Creek is the only way for United to receive Project water into Lake Piru, which provides significant value for both human and environmental uses. The District's following comments echo some of United's comments and focus on statements in the Draft that could affect the operation and viability of Santa Felicia Dam.



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The Draft includes two statements related to “reintroduction of steelhead into Piru Creek.” The use of “reintroduction” carries both the presumption there were documented populations of steelhead in this section of Piru Creek and that it is feasible to introduce them to Piru Creek. While United is implementing activities associated with the *Santa Felicia Dam Fish Passage Feasibility Assessment Study Plan* (Feasibility Study) 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 results of the Feasibility Study are not yet known. 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. If fish passage is not found feasible, a suitable alternative to passage may result.

The District agrees with United’s recommendation to revise language in the Draft by removing conclusive fish passage language to accurately reflect the uncertainty related to the conclusion of this process. The following recommended changes will address this concern.

Page 19, fourth bullet item

Draft Language:

- 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 Revision:

- 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

Draft Language:

- 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 Revision:

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

Deputy Forest Supervisor Thomas Torres
ATTN: Piru Creek CRMP

March 28, 2024

Thank you again for the opportunity to comment on the Draft CRMP for Piru Creek. Please feel free to contact me if there are any questions about the comments.

Very Truly Yours,



DENNIS D. LaMOREAUX,
General Manager

DDL/dh

CC: Mauricio E. Guardado, Jr., General Manager, UWCD
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