4/16/2024

Los Padres National Forest
Angeles National Forest
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ATTN: Piru Creek CRMP
https://www.fs.usda.gov/project/?project=58710
Gary.Seastrand@usda.gov

RE: Comments on the Piru Creek CRMP

Dear USFS:

The Center for Biological Diversity ("Center") and Los Padres ForestWatch submit the following comments regarding the Piru Creek Comprehensive River Management Plan (CRMP) and River Values Assessment for Piru Creek Wild and Scenic River. The Center focuses on protection of native species and their habitats through science, policy, and environmental law. The Center has more than 1.7 million members and supporters throughout the United States, including residents in California and members who regularly visit and enjoy the 7.25-mile Piru Creek Wild and Scenic River section and intend to do so in the future. The Center has worked for many years to protect imperiled plants and wildlife, the habitat they depend on, open space, air, and water quality in California on public lands managed by the Los Padres and Angeles National Forests. The Center in conjunction with Los Padres ForestWatch submitted comments on the Draft River Values Report on August 30, 2022, which are incorporated herein by reference. We appreciated the opportunity to attend the field trip on April 12, 2024, with other stakeholders to understand more about the hydrological regime and recreation challenges.

Unfortunately, as detailed below, the draft CRMP is incomplete in several ways, most importantly because it fails to address all of the outstanding and remarkable values (ORV) of the Piru Creek Wild and Scenic River related to wildlife and user capacity issues. These issues are critical to the development of a meaningful management plan and environmental analysis.

Background

In enacting the Wild and Scenic Rivers Act (WSRA) Congress declared "certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be

protected for the benefit and enjoyment of present and future generations." 16 U.S.C. § 1271. The WSRA classifies rivers, or segments thereof, as a "wild," "scenic," or "recreational" river. 16 U.S.C. § 1273(b). "Wild" rivers are those in their most natural state, representing "vestiges of primitive America." *Id.* § 1273(b)(1). Wild rivers are free of impoundments and generally inaccessible except by trail, with watersheds or shorelines essentially primitive and waters unpolluted. *Id.* "Scenic" rivers are "free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads." *Id.* § 1273(b)(2). "Recreational" rivers are "readily accessible . . . may have some development along their shorelines, and . . . may have undergone some impoundment or diversion in the past." *Id.* § 1273(b)(3).

Congress designated two (2) segments of Piru Creek – 4.25 miles as wild, and 3.0 miles as recreational for a total of 7.25 miles starting from 0.5 miles below Pyramid Lake to the Los Angeles/Ventura County line. 16 U.S.C. § 1274 (a)(197).

The WSRA requires agencies "to protect and enhance the values which caused [the river] to be included in said system without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values. In such administration primary emphasis shall be given to protecting [the river's] esthetic, scenic, historic, archeologic, and scientific features. Management plans for any such component may establish varying degrees of intensity for its protection and development, based on the special attributes of the area." 16 U.S.C. § 1281(a).

The WSRA further requires agencies to develop comprehensive management plans. Two core aspects of a river's management plan are the identification of the river area's "outstandingly remarkable values" and "user capacities" that ensure protection of the river's values. "The WSRA framework designates rivers based on specific "outstandingly remarkable values" which both justify the initial designation of a river as a WSR S[ystem] component, *see* [16 U.S.C.] § 1271, and provide the benchmark for evaluating a proposed project affecting a designated river." *Friends of Yosemite Valley v. Kempthorne*, 520 F.3d 1024, 1027 (9th Cir. 2008).

"User capacities" must prevent harm to the river's values. *See Friends of Yosemite Valley*, 520 F.3d at 1034 ("A standard must be chosen that does in fact trigger management action before degradation occurs."); 16 U.S.C. § 1274(d)(1) ("[T]he Federal agency charged with the administration of each component of the National Wild and Scenic Rivers System shall prepare a comprehensive management plan for such river segment to provide for the protection of the river values. The plan shall address resource protection, development of lands and facilities, user capacities, and other management practices necessary or desirable to achieve the purposes of this Act.")

The Ninth Circuit has addressed user capacity issues in depth:

> Analyzing the plain meaning of the terms within the phrase "address . . . user capacities" as well the Secretarial Guidelines, we interpreted the requirement to "address . . . user capacities" to mean that the CMP must include "*specific measurable limits on use*." *Id*. at 797 (emphasis added). "[T]he plain meaning of

> the phrase 'address . . . user capacities,' is simply that the CMP *must deal with or discuss the maximum number of people that can be received at a WSRS* ." *Id.* at 796 (emphasis added). However, the plain meaning does not mandate "one particular approach to visitor capacity." *Id*.
>
> Furthermore, the Secretarial Guidelines "interpret[ed] the WSRA to require the preparation of river '[m]anagement plans [that] state . . . the kinds and amounts of public use which the river area can sustain without impact to the [outstandingly remarkable values] [ORVs],' and to mandate ongoing studies to 'determine the quantity and mixture of recreation and other public use which can be permitted without adverse impact on the resource values of the river area.'" *Id.* at 797 (quoting 47 Fed. Reg. 39,454, 39,458-59). The Secretarial Guidelines, however, do not require one particular method of limiting user capacity. *Id.* They do not mandate, for example, a numerical cap on visitors. *Id*. ("[T]he Secretarial Guidelines do not specify that this obligation can be satisfied only by capping the number of visitors.").
>
> We concluded that the VERP framework, as set out in the 2000 CMP, failed sufficiently to address user capacities because it did not adopt "quantitative measures sufficient to ensure its effectiveness as a current measure of user capacities." *Id*. Rather than establish specific indicators or standards to implement the VERP, the 2000 CMP provided "examples" of indicators and standards. *Id*. at 796. By only providing illustrative standards, "the [2000] CMP fail[ed] to yield any actual measure of user capacities, whether by setting limits on the specific number of visitors, by monitoring and maintaining environmental and experiential criteria under the VERP framework, or through some other method." *Id.* This "fail[ure] to provide any concrete measure of use," we found, was inconsistent with our interpretation of the phrase "address . . . user capacities." *Id*. at 797.
>
> We instructed that "[o]n remand, the NPS shall adopt specific limits on user capacity consistent with both the WSRA and the instruction of the Secretarial Guidelines that such limits describe *an actual level of visitor use that will not adversely impact the Merced's ORVs* ." *Id.* (emphasis added). . . .
>
> As elucidated in *Yosemite II* [*Friends of Yosemite Valley v. Norton*, 366 F.3d 731 (9th Cir. 2004)], in *Yosemite I*, "we held that the entire Merced Wild and Scenic River [CMP] is invalid due to two deficiencies: (1) a failure to adequately address user capacities; and (2) the improper drawing of the Merced River's boundaries at El Portal." *Yosemite II*, 366 F.3d at 731.

Friends of Yosemite Valley, 520 F.3d at 1029-30.

Missing Outstanding Remarkable Values (ORVs) for Wildlife

While we support the designation of fisheries and geology in both sections of Piru Creek, and scenery in the Wild section of Piru, wildlife must also be included as ORVs because of the

uniqueness of the species that live there. Despite our constructive scoping comments on the Draft Piru River Resource Assessment, the Final Piru River Resource Assessment and CRMP fails to adequately justify why these ORVs were rejected.

The Forest Service Handbook (FSH) 1909.12, Chapter 80, 82.73a, lays out the criteria for assessing Wildlife ORVs as follows:

> 5. Wildlife. Wildlife values may be judged on the relative merits of either terrestrial or aquatic wildlife populations or habitat, or a combination of these conditions.
>
> > a. 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.
> >
> > b. 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 or endangered species, or species of conservation concern. Contiguous habitat conditions are such that the biological needs of the species are met.

Id. at pg. 13.

The Rivers Value Assessment dismisses wildlife as an ORV based on an absence of certain evidence and the comparative amount of habitat at issue (Assessment at 14-15), but wholly fails to address the uniqueness of this protected river habitat within the region and its value for wildlife as required in the Handbook.

Many species and habitats within the Piru Creek W&S corridor qualify under the Wildlife ORV values described above. Piru Creek and its adjacent riparian areas provide habitat for many species including federally designated critical habitat for the California condor (42 Fed. Reg. 47840-47845). The designation of the condor as a ORV is closely tied to the Piru Creek Wild & Scenic River because California condors are known to use ridgelines, rocky outcrops, and steep canyons for roosting (U.S. Fish and Wildlife Service, 2013) and these features are found in both sections of Piru Creek (River Values Assessment at pg. 6 and pg. 11). The CRMP and Rivers Value Assessment dismiss California condors because "there are no *confirmed* nesting or roosting sites within Piru Creek WSR" (Assessment at 15), but without any discussion of survey effort or evidence that the corridor is not used by condors.

Federally designated critical habitat for the southwestern willow flycatcher (SWWF) (78 Fed. Reg, 344-534) is also present in the Wild and Scenic corridor. All willow flycatchers are listed as endangered under the California Endangered Species Act and all willow flycatchers rely on riparian vegetation for breeding and raising young. The Assessment dismisses the importance of

this critical habitat by comparing it to the overall amount of critical habitat for the SWWF and dismissing its value as "minimal" (Assessment at 15), but fails to address its regional significance for the SWWF or its value as a linkage with other habitats regionally or nationally. Riparian areas are important flyways for migratory birds (*see* Pacific Birds Habitat Joint Venture). While many threads exist in the Pacific Flyway, each unique one is important to the neotropical songbirds as they make their annual migration (*Id*).

The Wild and Scenic corridor contains riparian habitat that is important for other riparian-reliant sensitive species including federally and California endangered least Bell's vireo (*Vireo bellii pusillus*), which may use the riparian zone for migration and feeding (although at this time there are no known vireo nesting or roosting sites in the corridor). Other sensitive species include yellow breasted chat (*Icteria virens*), and yellow warbler (*Setophaga petechia*).

The southwestern pond turtle (*Actinemys pallida*) is currently a federally proposed threatened candidate species (88 Fed. Reg. 68370-68399) and it is documented to occur within the recreational segment of Piru River (CNDDB 2024). While this species is noted to occur in Piru Creek (Piru Creek Wild and Scenic River Assessment (at pg. 13)), it is not discussed subsequently in the Assessment. Because the documented location of the southwestern pond turtles is located in Frenchman's Flat, which experiences high recreational use, it is critical that the CRMP recognize this Wildlife ORV and provide safeguards to protect the species in that high-use area. In addition, the number of riparian obligate species and other species that are associated with Piru Creek WSR shows the uniqueness of this WSR corridor for wildlife.

Federal critical habitat for the threatened California red-legged frog (*Rana draytonii*) is designated less than 0.2 miles downstream of the Piru Creek Wild and Scenic River corridor and may be affected by management of the area. While no red-legged frogs were documented in surveys performed in 2019, the Piru Creek Wild and Scenic River corridor still has habitat for the frog and can provide a recovery opportunity but the CRMP fails to recognize this.

Approximately 0.5 miles downstream of the Piru Creek Wild and Scenic River corridor downstream boundary, federal critical habitat for the arroyo toad (*Anaxyrus californicus*) is designated. There is a requirement that flows released from Pyramid Lake mimic a more natural hydrology in order to facilitate the arroyo toad lifecycle with the goal of recovering the population. The Assessment mentions this context but the CRMP provides no data on the status of the arroyo toad within the Piru Creek Wild and Scenic River corridor or whether any recent surveys have been done for the species in the corridor. A 2008 study of the Santa Clara River system (including Piru Creek) noted the presence of arroyo toads at two locations within the WSR corridor. Arroyo toads are known to move over a half mile, especially up and down streams (Mitrovich et al., 2011) potentially within the Wild and Scenic Corridor. No data on surveys within the Wild and Scenic corridor are provided for arroyo toad. The arroyo toad needs recovery opportunities and therefore the CRMP needs to recognize it as a Wildlife ORV and include opportunities for it to move upstream from the documented populations downstream of the Wild and Scenic Corridor and include management for its recovery within the Wild and Scenic corridor. The Recovery Plan for the arroyo toad (U.S. Fish & Wildlife Service, 1999) identifies threats specifically for Piru Creek and benchmarks for downlisting and delisting of the species. The Wild and Scenic CRMP needs to address the threats in lower Piru Creek and

provide management guidance that supports the requirements for downlisting and delisting the arroyo toad.

The Piru Creek watershed also contains the westernmost extent of the range of the Desert banded gecko (*Coleonyx variegatus variegatus*), the only known location of this species in Ventura County and the only gecko species known to occur in Los Padres and Angeles National Forests.

The determinations for the ORV along Piru Creek are arbitrary, not in alignment with determinations of Wildlife ORVs in other recent CRMPs in the "region of comparison," and downplay the significance of the wildlife species and habitat found in the Piru Creek Wild and Scenic River corridor. In other determinations of ORVs for Wild and Scenic River Comprehensive Management Plans in the adjacent San Bernardino National Forest, which is within the same "region of comparison" as Piru, Wildlife was designated as an ORV for southwestern willow flycatcher in the Whitewater Draft CRMP, the Deep Creek Draft CRMP, potential habitat in the north fork of the San Jacinto River Final CRMP, and Bautista Creek Final CRMP despite the lack of federally designated critical habitat for the species in those areas. Yet, for Piru Creek which is designated as federal critical habitat for the southwestern willow flycatcher, the Forest Service dismissed recognition of this habitat as a Wildlife ORV. We urge the planning team to revisit the Wildlife ORV based on this and other information provided in this letter.

In the North Fork of the San Jacinto River, the Wildlife ORVs were determined based on:

> "The wildlife values along the North Fork San Jacinto River are recognized as being outstandingly remarkable based on the following: 1) the presence of historic and suitable habitat for mountain yellow-legged frog, 2) recognition of the value of this habitat based on the highly endangered status of the mountain yellow legged frog and, 3) the diversity of Forest Service Region 5 Sensitive Species present in the area, including the California spotted owl, southern rubber boa, and San Bernardino flying squirrel."

(U.S. Forest Service, 2022 – Appendix A at pg. 17).

The robust analysis of Wildlife ORV in the North Fork of the San Jacinto River CRMP includes critically endangered mountain yellow-legged frog – southern California DPS that is not currently present in that WSR, but its habitat remains suitable and has value for species recovery, and numerous non-federally listed Forest Service Sensitive species.

In Fuller Mill Creek, which is a re-introduction site for the previously extirpated federally and State endangered mountain yellow-legged frog – southern California DPS (*Rana muscosa*), the wildlife ORVs were determined based on:

> "The wildlife values along Fuller Mill Creek are recognized as being outstandingly remarkable based on the following: 1) the presence of occupied habitat for mountain yellow-legged frog and recognition of the value of this habitat for species recovery, 2) recognition of the significance of this occurrence;

it is one of only several occurrences in southern California, and 3) presence of other Forest Service Region 5 Sensitive Species including the California spotted owl and San Bernardino flying squirrel.

(Id, 2022)

Similar to the North Fork of the San Jacinto River Wildlife ORV determination, Fuller Mill Creek actually has a reintroduced population of mountain yellow-legged frogs that persist and the Wildlife ORV also identifies additional Forest Service Sensitive Species.

In the case here of Piru Creek, habitat for the historically documented population of the federally and State endangered foothill yellow-legged frog - south coast DPS (*Rana boylii* pop. 6) (CNDDB 2024), which was presumed extirpated in 1994, occurs. Based on the global amphibian die-off crisis (Luedtke et al., 2023), the need for recovery efforts for this local critically endangered South Coast DPS, the current flow regime that mimics more natural flow patterns, and the presence of habitat within the Piru Wild and Scenic River, should also trigger the Wildlife ORV as an important designation, as it has on National Forests in the "region of comparison" for other critically endangered frogs (see discussion above – North Fork of the San Jacinto and Fuller Mill – mountain yellow-legged frog).

Similarly, the opportunity to recover the federally threatened California red-legged frog which occupied Piru Creek (*CNDDB - Plants and Animals*, 2024) should be recognized in the CRMP and supports a Wildlife ORV here. The CRMP should include discussion of opportunities for red-legged frog to be re-patriated for recovery and for the Piru WSR to be managed for recovery of this and other critically endangered species.

As identified above, other CRMPs in the "region of comparison" include Forest Service Region 5 Sensitive Species as a value on which to identify Wildlife ORVs. These other regional CRMPs include wildlife ORVs based on sensitive species:

- Whitewater Draft CRMP (U.S. Forest Service, 2023d)- gray vireo (*Vireo vicinior*), and crissal thrasher (*Toxostoma crissale*) and desert bighorn sheep (*Ovis canadensis nelsoni*);
- Deep Creek Draft CRMP (U.S. Forest Service, 2023b)- several species of falcon, deer (*Odocoileus hemionus*) and black bears (*Ursus americanus*) as well as the riparian areas being used by migrating birds and other wildlife;
- Bautista Creek Final CRMP (U.S. Forest Service, 2022) - legless lizard, three-lined boa, two-striped garter snake, and San Diego ringneck snake. The greenest tiger beetle, a rare invertebrate, was collected in the 1970s along the creek and may still occur and federally designated critical habitat for the federally endangered Quino checkerspot butterfly.

Other CRMPs, potentially outside the "region of comparison" but still in Forest Service Region 5, in the Inyo National Forest CRMPs on two designated Wild and Scenic River corridors identified ORVs to include Wildlife ORVs based on the following:

- Owen River Headwaters CRMP (U.S. Forest Service, 2023c)- Federally threatened Yosemite toad and "one of the few occurrences of Yosemite toad within the Forest that is

outside of the USFWS designated critical habitat (USDA Forest Service 2017a)"; northern goshawk; potential habitat for willow flycatcher (includes Sierra Nevada mountain willow flycatcher and Great Basin willow flycatcher), but no known breeding habitats (California Department of Fish and Wildlife 2007; USDA Forest Service 2017b); significant seasonal migration corridor for mule deer, and summer foraging habitat and fawning areas; also provides an important trans-Sierra migratory corridor for black bear and bobcat. The WSR corridor also hosts a diverse community of bird species documented through survey that identified 17 bird species including "dark-eyed junco, mountain chickadee, and warbling vireo (Point Blue Conservation Science 2021)". The upper watershed may provide foraging habitat for California spotted owl; high diversity of butterfly species occurs "including six species listed as species of conservation concern (SCC) for the Forest (USDA Forest Service 2019) and potential aquatic snail detections or surveys for Wong's springsnail and Owens Valley springsnail, both of which are SCC species.

- Cottonwood Creek CRMP (U.S. Forest Service, 2023a) - The currently proposed threatened bi-state distinct population segment (DPS) of sage grouse, which is a Forest Service Species of Conservation Concern (SCC); northern goshawk; "WSR corridor also hosts a diverse community of bird species" based on surveys that identified 26 bird species along a transect near Cottonwood Creek including "dusky flycatcher, house wren, and song sparrow (Point Blue Conservation Science 2021)"; summer herd of mule deer and herds of Nelson desert bighorn sheep, a SCC; "Willow shrub communities within the riparian zone may provide habitat for migratory bird species including SCC willow flycatcher (includes Sierra Nevada Mountain Willow Flycatcher and Great Basin Willow Flycatcher), but no known breeding habitats"; "numerous spring systems may provide habitat for aquatic springsnails and create fens with wet organic layers. SCC Wong's springsnail and Owens Valley springsnail are present in this area, although they have not been found in the WSR corridor. Additional surveys for these species and monitoring for aquatic springsnail species are recommended." It should also be noted that the Cottonwood Creek Wildlife ORV included a very rare fish, the Lahontan cutthroat trout. SH/RT are aquatic wildlife and should be included as Wildlife ORV.

Other Region 5 National Forests evaluations of Wildlife ORVs both within the "region of comparison" as well as outside of it recognize the important wildlife values of federally designated critical habitat, re-introduction opportunities for critically endangered amphibians to suitable habitat where they may not currently be present, the importance of non-listed but species of conservation concern, the important values of riparian corridors for migratory birds, the importance of terrestrial habitat with water for more common species and invertebrates tied to water (springsnails) in identifying Wildlife ORV. Comprehensive inclusion of species particularly when surveys have not been implemented throughout the corridor, is needed in the Piru Creek CRMP. The Forest Service must implement consistent metrics for identifying Wildlife (ORV) for their CRMPs at least throughout Region 5. The Forest Service's failure to recognize Wildlife ORV in Piru Creek WSR is inconsistent with the Forest Service's own guidance and practice across Region 5.

Wildlife Connectivity and Linkages

The Piru Creek Wild and Scenic River area has been modeled to provide important wildlife connectivity by three different efforts as follows:

- The South Coast Missing Linkages includes a large portion of the Piru Creek Wild and Scenic corridor in its Sierra Madre-Castaic Linkage Design (South Coast Wildlands, 2008). Figure 1 overlays this linkage design over the Piru Creek Wild and Scenic River Corridor
- The Conservation Biology Institute included the Piru Creek Wild and Scenic River area in its modeling of Connectivity Linkages and Conditions for the Desert Renewable Energy Conservation Plan (Conservation Biology Institute, 2015). Figure 2 overlays this linkage over the Piru Creek Wild and Scenic River Corridor.
- California Department of Transportation and California Department of Fish and Game commissioned the California Essential Habitat Connectivity Project identify a functional network of connected wildlands that is essential to the continued support of Californias diverse natural communities and wildlife (California Department of Transportation & California Department of Fish and Wildlife, n.d.). Figure 3 overlays this habitat connectivity with the Piru Creek Wild and Scenic River Corridor.

These three figures show the importance of the Piru Creek Wild and Scenic River Corridor for wildlife movement and linkages. Wildlife connectivity allows for the movements of organisms, for gene flow, and for range shifts and therefore is a key factor in the long-term viability of populations, particularly for animal species (Liu et al., 2018). Because the Piru Wild and Scenic Corridor is included in no less than three separate wildlife connectivity efforts that are relied on by State and federal agencies, the Piru CRMP must also include Wildlife as an ORV.

Federal Reserved Water Rights

The CRMP recognizes that

> "The amount of the federal reserved water right is not identified at designation, and therefore must be quantified and secured through applicable state-based processes. To date, a federally reserved water right has not been asserted for this river."

CRMP at pg. 7

The CRMP fails to provide any timetable for asserting and securing the federal reserved water right. Water is a critical component of the "Wild and Scenic" designation and management under the Act. The CRMP must identify a reasonable timeline for securing the water rights for this section of Piru Creek.

User Capacity and NEPA Missing

In commenting on other CRMPs, the User Capacity and NEPA document have always been provided as part of a comprehensive CRMP comment period. In discussion with the Forest

Service representatives at the field meeting on 4/12/2024, we understood that the User Capacity document and the NEPA document (and Environmental Assessment) will be released in the future. The Forest Service needs to revise the CRMP and in particular the ORV assessment *prior* to embarking on the User Capacity and NEPA documents so that the appropriate resources – including the Wildlife ORVs – are included in the revised CRMP.

Conclusion

Based on the data presented above, the draft CRMP's failure to designate Wildlife as an ORV for both the Recreational and Wild sections of Piru Creek is unsupportable and Wildlife ORVs must be included in a revised CRMP and addressed in the User Capacity and the NEPA document discussed above. In addition, other issues identified in our scoping comments remain unaddressed as explained in the paragraphs above. We look forward to reviewing a revised CRMP and environmental documents. Please keep us on the list of interested public for all notices associated with this project.

Sincerely,

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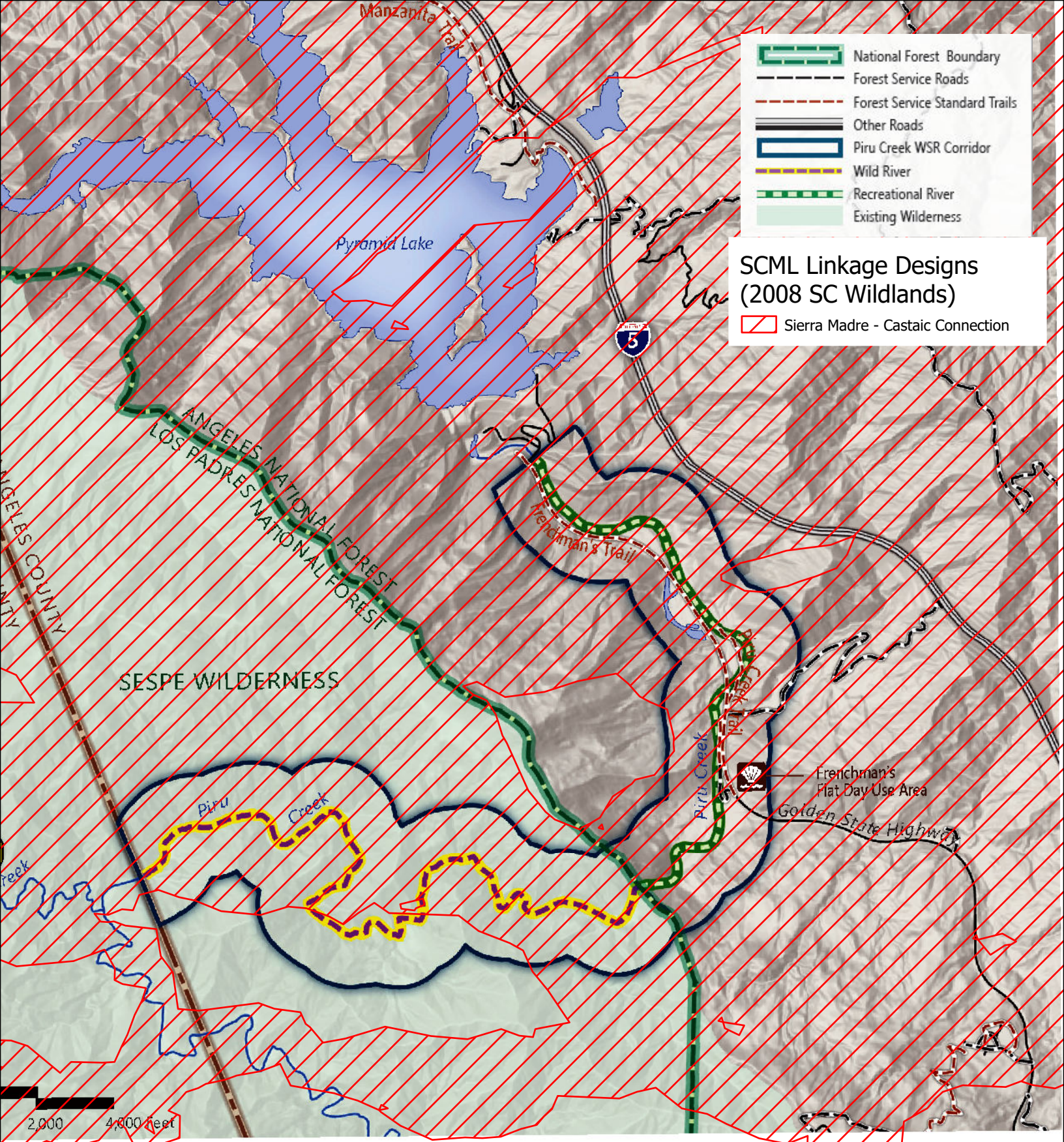
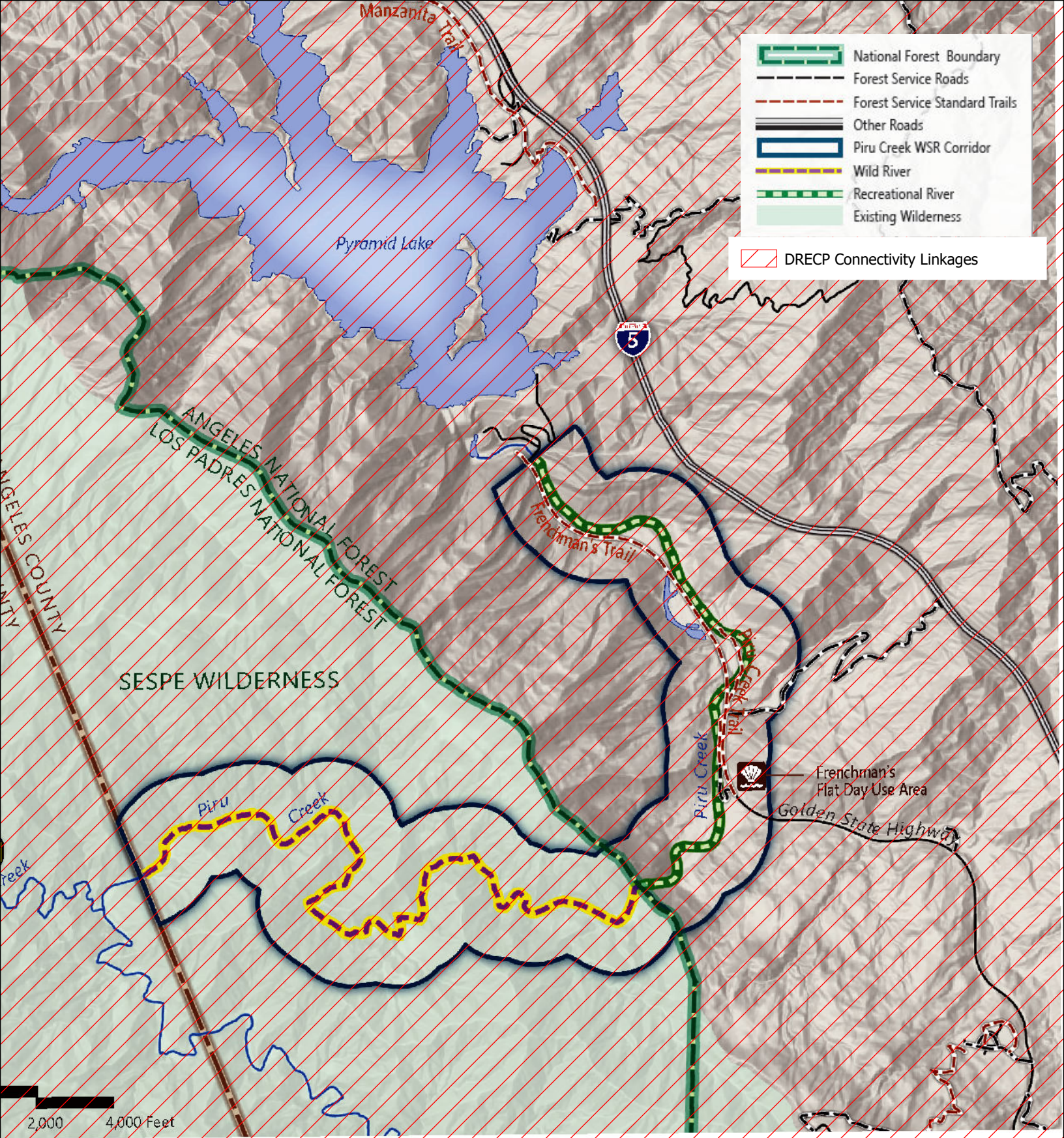


Angeles National Forest &
Los Padres National Forest
Los Angeles County, California

Piru Creek Comprehensive River Management Plan

Figure 1

Project Area and Proposed Final Boundary

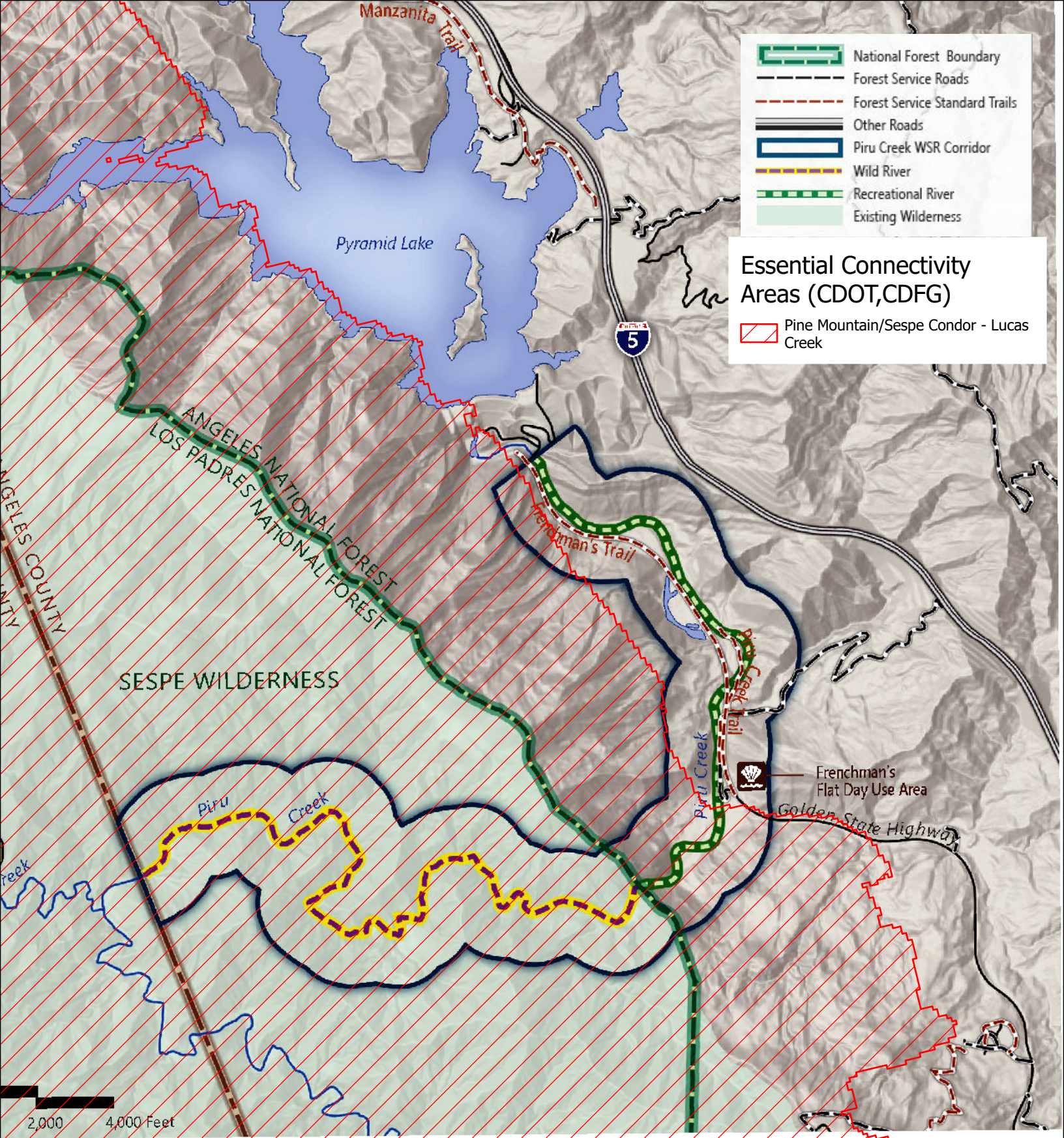


Angeles National Forest &
Los Padres National Forest
Los Angeles County, California

Piru Creek Comprehensive River Management Plan

Figure 2

Project Area and Proposed Final Boundary



Angeles National Forest & Los Padres National Forest
Los Angeles County, California

Piru Creek Comprehensive River Management Plan

Figure 3

Project Area and Proposed Final Boundary