



April 16, 2024

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

**Attn: Piru Creek CRMP and River Values Report**

Dear Supervisor Torres:

Thank you for soliciting public comments in response to the Piru Creek Wild and Scenic River Draft Comprehensive River Management Plan (CRMP) and River Values Assessment. The following are the joint comments of CalWild and other organizations.

**Piru Creek Is A Special Place**

Despite the extensive resource information in the draft CRMP and River Values Assessment, the Forest Service fails to capture in its documents the very special nature of Piru Creek. The name “Piru” is derived from the native Tataviam word “Pi’irukng” or “place of grass.”<sup>1</sup> From its source in the Sespe Wilderness, Piru Creek flows east and then south to its confluence with the Santa Clara River. After traversing its semi-wild headwaters, the creek meets two dams but then enters the Sespe Wilderness cutting “...a dramatic rocky canyon through the formidable south face of the Santa Ynez Mountains.”<sup>2</sup>

Here is what Los Angeles Magazine says about Piru Creek:

Of the countless myths that have defined Los Angeles, the most persistently misguided one is that the city is too congested, too paved, to allow the natural

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<sup>1</sup> Salazar, Alan. *A Tataviam Creation Story*. Sunsprite Publications 2021, pg.

<sup>2</sup> Palmer, Tim. *Field Guide to California Rivers*. University of California Press 2012, pg. 238.

world much chance of survival. Our principal artery of water may be a concrete trench, but just an hour north up the Golden State Freeway runs a trout stream as wild and pristine as any that Hollywood could conjure. Our mention of **Piru Creek** is made in the hope that with awareness comes conservation, that its 14-mile course, through canyons and cottonwoods, from Pyramid Lake to Lake Piru, will be cherished as the rarest of urban treasures. A segment near Frenchman's Flat is designated catch-and-release only, and the omnibus lands bill passed by Congress this spring will afford the fishery even greater protection, but it remains fragile.<sup>3</sup>

#### A Chronology of Piru Creek Protection Efforts

1982 – Piru Creek was included by the National Park Service in the Nationwide Rivers Inventory, which identified the creek between Pyramid Dam and Piru Reservoir as potential National Wild and Scenic River with outstanding scenery, wildlife, and geology values.

1988 – The Forest Service assessed the creek for its National Wild and Scenic River potential in the 1988 Los Padres National Forest Plan, but expressed doubts that the stream was free flowing, categorically denied that it possessed any natural or cultural values that would make it eligible for protection, and even raised the issue that upstream dam releases made it unsafe for public recreation. Conservationists appealed the ineligible determination for Piru Creek.

1992 – Congress passes the Condor Range and River Protection Act, which directs the Forest Service to conduct a formal Wild and Scenic River Study of Piru Creek in three years.

1999 – Piru Creek was identified by Forest Service biologists as an area of high ecological significance, to be considered a key part of the ecological heritage of southern California.<sup>4</sup>

2005 – In the Los Padres Forest Plan Revision, the Forest Service chose not to recommend National Wild and Scenic River protection for the creek, even though the segment between Pyramid Dam and Piru Reservoir (including the 7.25-mile segment protected by Congress as a Wild and Scenic River) was finally determined by the agency to be free flowing and to possess an outstandingly remarkable geological value. Conservationists appealed this decision.

2009 – Congress passes omnibus legislation signed by President Obama adding 7.25 miles of Piru Creek downstream of Pyramid Dam to the National Wild and Scenic Rivers System.

2012 – The Forest Service fails to develop a Comprehensive River Management Plan for the Piru Creek Wild and Scenic River within the three-year period after designation required by law.

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<sup>3</sup> <https://www.lamag.com/guide/sports-recreation/piru-creek/>

<sup>4</sup> Stephenson, John R., Gena M. Calcarone. *Southern California Mountains and Foothills Assessment*, Forest Service Pacific Southwest Research Station December 1999, pgs. 335, 350.

2018 – The Forest Service settles a lawsuit challenging the agency’s failure to develop a Comprehensive River Management Plan for the Piru Creek Wild and Scenic River and initiates the planning process 12 years after the legally required deadline.

2020 – A whitewater boating study conducted as part of the federal relicensing of the State Water Project (which includes Pyramid Dam), identifies an opportunity to provide whitewater kayaking flows in Piru Creek downstream of Pyramid Dam when state water is released downstream to water contractors. The preliminary 4(e) license conditions recommended by the Forest Service include the provision to coordinate downstream water releases to provide up to six weekend days annually during the winter of sufficient flows to kayak Piru Creek downstream of the dam.<sup>5</sup>

2022 – The Forest Service releases for public review a draft River Values Assessment (a key step in CRMP development) for the Piru Creek Wild and Scenic River. In response to input from the National Marine Fisheries Service, the Forest Service identifies fish as an outstandingly remarkable value for Piru Creek (the native rainbow trout in Piru Creek are genetic southern steelhead and could play a role in the restoration of this species). In addition, the Forest Service identifies an outstandingly remarkable scenery value. Despite extensive comments submitted by conservationists, the agency continues to balk at identifying an outstandingly remarkable recreation value.

2023 – The Forest Service releases the draft CRMP and a “final” River Values Assessment that continues to reject any consideration of recreation as an outstandingly remarkable value of Piru Creek.

The Forest Service has a long history of discounting Piru Creek, both as a recreational resource and as a potential Wild and Scenic River. The good news is that the agency has responded positively to input from other agencies and the general public about the values of the creek. It is our hope that the Forest Service will carefully review the information provided by the public and reconsider its finding that Piru Creek has no outstandingly remarkable recreation value.

### **Piru Creek Possesses an Outstandingly Remarkable Recreation Value**

The designated segment provides popular, diverse, and rare recreational opportunities, all in a relatively short but accessible 7.25-mile segment. According to Forest Service guidelines:

To be identified as outstandingly remarkable, a river-related value must be unique, rare, or exemplary feature that is significant when compared to similar values from other rivers at a regional or national scale. Unique, rare, or

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<sup>5</sup> Forest Service. *Preliminary Terms and Conditions, and Recommendations for the South SWP Hydropower Project*, FERC No. P-2426-227, California Dept. of Water Resources and Los Angeles Dept. of Water and Power, Jan. 25, 2021.

exemplary features are those that are conspicuous examples of these values, among the best representatives of these features, within a region or the nation.<sup>6</sup>

Although the guidelines define outstandingly remarkable values as unique, rare, or exemplary features that are conspicuous examples of the values they represent, they do not require the values to be conspicuously dissimilar (as incorrectly claimed in the draft River Values Report on pg. 2) to be considered outstandingly remarkable. In fact, a value may be unique, rare, or exemplary, but it need not exhibit more than one of these traits. As explicitly stated in the guidelines, the bottom line is that a value may be considered outstandingly remarkable if it possesses unique, rare, or exemplary features that are conspicuous example of these values.

In summary, Piru Creek's outstandingly remarkable recreation value includes:

Fishing – One of only two trout streams in southern California restricted to catch and release only with barbless hooks (the other being Sespe Creek). The Fisheries Resource Volunteer Corps (FRVC) conducts public education and safety patrols on Piru Creek and removes litter, fire rings, and wading pool dams, while servicing the angler survey box and temperature monitors. From 2009 to 2018, the FRVC made 1,002 visitor contacts and forwarded 89 angling surveys to the California Dept. of Fish and Wildlife. Although angler satisfaction and success has reportedly decreased since the elimination of fish flows from Pyramid Dam, Piru Creek still offers an easy escape fishing from the nation's second largest city and fishing success (and the size of trout caught) seem to increase as you head downstream from Frenchman's Flat.<sup>7</sup> Despite the degradation of the sport fishery caused by the 2005 elimination of fish flows, Piru Creek seems to still be a popular destination for catch and release trout fishing. Here is a sampling of Piru Creek fishing videos:

- [https://www.youtube.com/watch?v=Lmq\\_PI7\\_HyE](https://www.youtube.com/watch?v=Lmq_PI7_HyE)
- [https://www.youtube.com/watch?v=tEZ\\_4NL3zX0](https://www.youtube.com/watch?v=tEZ_4NL3zX0)
- <https://www.youtube.com/watch?v=gYajOCedIWY>
- <https://www.youtube.com/watch?v=oso4myYMGNA>
- <https://www.youtube.com/watch?v=xmNGy8V0rf0>

Day Use Recreation – The Forest Service acknowledges in the River Values Report that visitor use at Frenchman's Flat is high and typically exceeds the parking capacity of its parking lot during high use periods of April to November. Visitors enjoy picnicking beside the stream, wading in the creek, fishing, and other typical day use pursuits. Frenchman's Flat is a popular summer destination for families from low-income communities of color seeking low-cost relief from the summer heat. With easy access from Interstate 5, Frenchman's Flat is perhaps the closest and most accessible river-based day use recreation site on National Forest lands in northern Los Angeles County. A short trail provides access from Frenchman's Flat to the downstream Wild segment. In addition to the more traditional day use recreation pursuits,

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<sup>6</sup> FSH 1909.12, Chap. 80, 1/30/2015, sec. 82.73, pg. 9.

<sup>7</sup> [https://www.ecoangler.com/habitat/Piru\\_Creek\\_California.html](https://www.ecoangler.com/habitat/Piru_Creek_California.html)

Frenchman's Flat also is a relatively newly developed area for climbers to practice bouldering.<sup>8</sup> The site is also visited by entomologists because the creek supports fascinating species of damsel and dragon flies.<sup>9</sup> A limited number of dispersed camping sites are also available along the creek.

Whitewater Kayaking – During good water years, Piru Creek between Pyramid Dam and Piru Reservoir provides an extraordinary class III-V whitewater kayaking adventure unparalleled in southern California. This extraordinary recreation value is perhaps best documented by Gary Valle'. According to his website:

Few of the hundreds of thousands of people that have driven up Interstate 5's Castaic grade, thirty minutes north of downtown Los Angeles, are aware of the stunning gorges that are found along Piru Creek upstream and downstream of Pyramid Reservoir...Add water and the reach between Pyramid Dam and Lake Piru becomes one of the most unique, isolated, and scenic one-day, road accessible, whitewater runs in the Western U.S. It is a "must do" classic by many expert whitewater kayakers...Water is the key. Water years with average or above average precipitation will usually produce some boatable days in February and March...Part of the appeal of this reach is its isolation. More than 10 miles of the creek is totally wild and cannot be accessed by road or maintained trail. Hiking in or out is a formidable task. Such wilderness is rare in Southern California. Rarer still is the special combination of wilderness and natural wonder found here.<sup>10</sup>

Depending on the water year, Piru Creek will not always have natural flows of sufficient amount and duration to provide whitewater recreation (defined in the DWR whitewater boating study as at least 200 cfs of flow for 4 daylight hours). But in the 17-year period between 2007 and 2024, there was sufficient natural flows in the creek in 11 years to provide anywhere from one to 22 days of winter whitewater boating, with a whopping 73 boatable days in 2024 (the water year of record). Whitewater opportunities will increase when the new FERC license is fully implemented. The license provides for the coordination of downstream water contract deliveries that would provide up to 6 weekend days of winter boating annually. No other stream south of the Tehachapi Mountains can boast of similar opportunities.

To view a video of the newly minted Pyramid Run on Piru Creek (the 3-mile segment upstream of Frenchman's Flat), visit: <https://www.facebook.com/watch/?v=2649913611758236>. The ease of access to this class III run (which parallels the old Golden State Highway) will likely attract organized groups as well less expert boaters, providing an outstanding recreation opportunity found nowhere else in the region. Whereas the downstream wilderness run will

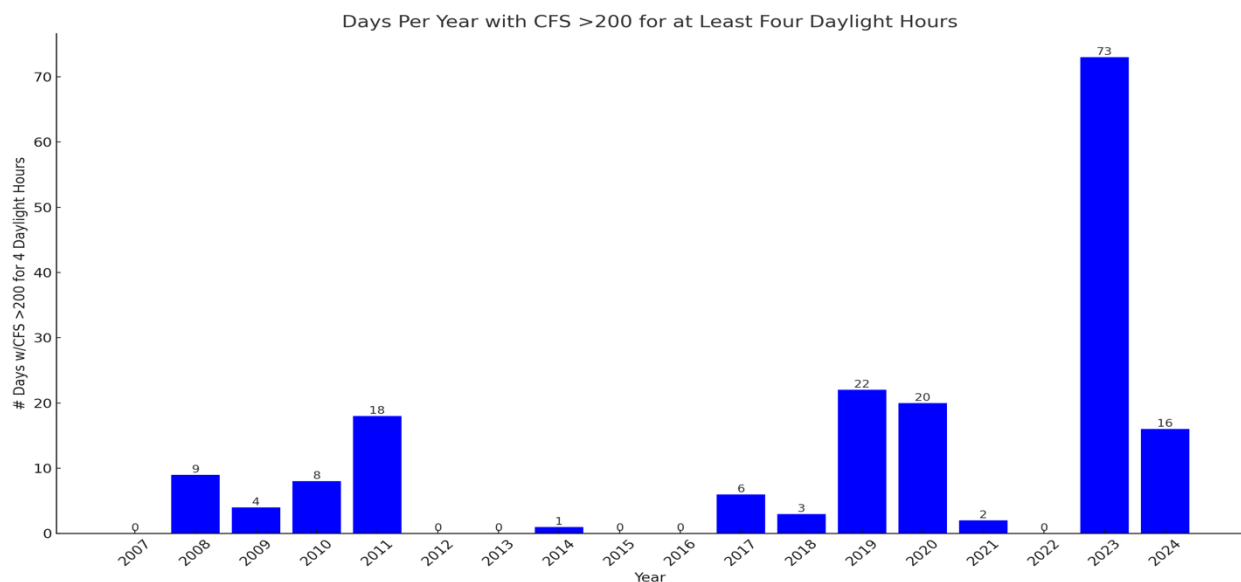
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<sup>8</sup> <https://www.mountainproject.com/area/112785290/piru-creek>

<sup>9</sup> <http://creagrus.home.montereybay.com/CA-LA-Piru.html>

<sup>10</sup> <https://www.sierraphotography.com/creeking/piru02.htm>

likely attract expert boaters. Regardless, the whitewater experience provided by both segments constitute an outstandingly remarkable recreation value.



Source: American Whitewater, USGS gauge data.

Canyoneering – The rugged, remote, and trackless canyon through which Piru Creek flows from Frenchman’s Flat to Piru Reservoir is an excellent destination for canyoneers. These are people who enjoy exploring trail-less river canyons. Although this recreation seems restricted to only those who have the physique and skill, a quick search of the internet documents numerous canyoneering adventures in the rugged gorges below Frenchman’s Flat. Just a sampling:

- Remote Piru Creek, in the Los Padres National Forest north of Los Angeles, offers a challenging wilderness experience, by Jerry Schad.<sup>11</sup>
- Piru Creek, from Pyramid Lake to Lake Piru, by David Stillman.<sup>12</sup>
- Lost in the Los Padres: Piru Creek Drainage from Lake Pyramid to Lake Piru, by Christopher Lord.<sup>13</sup>
- Backpacking Piru Creek Wild & Scenic River, by Kenneth Kramm.<sup>14</sup>
- Backpacking Light – Piru-Maniacs: Three Back to Back Trips Through the Piru Creek Watershed: Part III: Down the River, by Nico.<sup>15</sup>
- Adventure Hikes and Canyoneering in the Southwest: Hike K5, Piru Gorge, by Christopher Brennen.<sup>16</sup>

<sup>11</sup> <https://www.sandiegoreader.com/news/2007/nov/15/remote-piru-creek-los-padres-national-forest-north/>

<sup>12</sup> <http://davidstillman.blogspot.com/2012/05/piru-creek-from-pyramid-lake-to-lake.html>

<sup>13</sup> <https://christopherplord.blogspot.com/2018/05/piru-creek-drainage-from-lake-pyramid.html>

<sup>14</sup> <https://www.youtube.com/watch?v=9Axw994n8iU>

<sup>15</sup> <https://backpackinglight.com/forums/topic/64501/>

<sup>16</sup> <http://www.dankat.com/swhikes/piru.htm>

- Beautiful Creek & Wild Canyon near L.A., Piru Creek Trail Hike, Wild Flowers by Ms. Ada K.<sup>17</sup>
- Piru Creek Trip Report, by beestakingthe405.<sup>18</sup>
- Sierra Club Hundred Peaks Section: The Piru Narrows, by Erik Siering.<sup>19</sup>

All of these blogs and reports emphasize the special nature of Piru Creek's wild canyon between Frenchman's Flat and Piru Reservoir. Although other remote stream canyons in southern California are explored by canyoneers, Piru Creek seems to be winning the internet battle in terms of coverage.

The bottom line is that Piru Creek offers a diversity of recreational opportunities, including catch and release trout fishing, day use recreation at Frenchman's Flat, class IV whitewater kayaking, and canyoneering. This combination of recreation opportunities are unparalleled in the southern California region. Day use recreation at Frenchman's Flat and canyoneering in the track-less canyon downstream are exemplary of the recreational services provided by streams flowing through public lands in southern California, while catch and release trout fishing with barbless hooks and class IV whitewater kayaking opportunities are rare indeed in this region.

The reasons cited in the River Values Report as to why the Forest Service thinks that these diverse recreational values are not outstandingly remarkable include:

*The recreational opportunities are similar to several other rivers in the region of comparison and are not unique or rare. A variety of other developed recreation sites on the National Forests of southern California offer opportunities for accessible water play and dispersed recreation access.*

Rebuttal – The opportunities are similar only because streams flowing through public lands offer typical water-based recreation activities. Ease of access, its location in northern Los Angeles County, the diversity of opportunities, and the creek's well-documented high quality recreational opportunities such as whitewater kayaking and canyoneering in a track-less wilderness gorge are quite rare in southern California.

*Fishing success is below average due to lack of stocking and several other rivers in the region are recognized as California Wild and Heritage Trout Waters.*

Rebuttal – Fishing success in Piru Creek's catch and release section has decreased. This is likely attributable to the elimination of fish flows and fish stocking. Nevertheless, Piru Creek's catch and release segment represents only 1 of 2 rivers with catch and release requirements in the region of comparison (the other is Sespe Creek). Anglers continue to fish the catch and release segment and share their experience with fellow anglers on the internet. Piru Creek fishing is

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<sup>17</sup> <https://www.youtube.com/watch?v=iJnZ0TcykxE>

<sup>18</sup> [https://www.reddit.com/r/socalhiking/comments/30yyv5/piru\\_creek\\_trip\\_report/?rdt=37879](https://www.reddit.com/r/socalhiking/comments/30yyv5/piru_creek_trip_report/?rdt=37879)

<sup>19</sup> <https://hundredpeaks.org/archives/hps01346.htm>

enough of a going concern to motivate the Fisheries Resource Volunteer Corps to service the angler surveys, clean up litter and graffiti, remove wading dams, and educate the public.

*Access to the wild section is limited due to topography and offers non-technical canyoneering opportunities comparable to other river canyons in the region.*

Rebuttal – Limited access to the wild canyon between Frenchman’s Flat and Piru Reservoir is central to this activity. No other unroaded and trail-less river canyon in southern California is featured in as many posted videos and blogs on the internet

*The potential for whitewater boating is constrained due to flows as well as challenging topography and vegetation and the technical nature of rapids limits opportunities to experts. The Santa Clara, San Gabriel, Ventura, and Los Angeles River offer boating opportunities similarly constrained by consistent lack of flows. Whitewater boating opportunities do not draw visitors from outside the region.*

Rebuttal – A recreational pursuit may be limited to experts and still be rare, unique, or exemplary, and therefore outstandingly remarkable. The fact is expert kayakers consider Piru Creek to be a rare if not unique whitewater run. The stream is likely to become more of a kayaking destination when whitewater flows are implemented. Most of the rivers cited by the Forest Service as providing similarly constrained boating opportunities don’t even flow through National Forest lands. The *Southern California Creeking* blog provides perhaps the most comprehensive inventory of whitewater kayaking runs in southern California, featuring 37 runs on 22 creeks.<sup>20</sup> While whitewater boating on the streams in the inventory share similar traits (they’re typically limited to expert kayakers, have short seasons due to the arid nature of southern California and multi-year droughts, and suffer vegetation hazards), Piru Creek is clearly the stand-out in this inventory in terms of ease of access, outstanding scenery, and the wild nature of the boating experience. It is also the second longest run in the inventory. Further, no other stream in the region of comparison has a FERC license provision that provides for at least six weekend days annually of whitewater boating, in addition to the days when natural flows are sufficient.

We must challenge the unsupported statement in the river values report that whitewater boating opportunities do not draw visitors from beyond the region. There is no data to confirm this. Several boaters living more than 100 miles away from Piru Creek participated in the boating study for the FERC license. It seems certain that Piru Creek will attract boaters from beyond the region once the boating releases are implemented and become known to the whitewater community. Certainly, whitewater boating on both the Recreation and Wild segments of Piru Creek has the potential to attract visitors from beyond the region, which meets the guidelines.

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<sup>20</sup> <https://www.sierraphotography.com/creeking/socalcreeking.htm> by Gary Valle’ and Gary Gunder.



In summary, we believe that Piru Creek's Recreational and Wild segments possess outstanding recreation value. This value includes the diversity of recreational opportunities as well as whitewater kayaking, canyoneering, and catch and release fishing opportunities that are rare in the region.

### **User Capacity Analysis**

Completion of a user capacity analysis is crucial to the protection of Piru Creek's free flowing character and outstanding values, particularly in the heavily used Frenchman's Flat area. The day use area is often over capacity (in terms of its parking lot and in regard to people on the ground) during summer weekends. We urge the Forest Service to carefully follow the guidance provided in the Interagency Wild and Scenic River Coordinating Council's white paper, *Steps to Address User Capacities for Wild and Scenic Rivers*.

### **Management and Potential Future Management Actions**

We generally support the list of management and potential future management actions provided in the draft CRMP. One useful addition from the reviewers perspective would be to explain why some are management actions and others are simply "potential" managements actions. What is the threshold or action that triggers moving an action from the potential list to be implemented?

### **Invasive Vegetation Removal**

There is tamarisk visible growing on the flat currently used by DWR for storage of debris removed from the Angeles Tunnel. There is also tamarisk and scotch broom visible along the trail that leads downstream towards the Wild segment from Frenchman's Flat. The CRMP should identify and remove non-native and invasive tamarisk along the Recreational segment.

### **Coordination With and Support of Volunteer Stewards**

There is a high level of public interest in stewardship activities, particularly at Frenchman's Flat. The FRVC routinely patrols the area, services the angler survey box, picks up litter, and removes graffiti and wading dams. Other groups have organized clean ups of the area, including the Santa Clarita-based Community Hiking Club and the Backcountry Horseman and Anglers. The CRMP should include commitments from the Forest Service to support these efforts.

### **Angeles Tunnel Debris Piles**

There is a large flat on Piru Creek's Recreational segment accessed by a DWR road to the Angeles Tunnel adit. Currently much of this flat is covered by tunnel muck and wood debris from the tunnel. We assume this activity is covered by a special use permit. The CRMP should consider including a potential future management action to clear the debris piles and restore the flat to public recreation uses and wildlife habitat, while maintaining DWR's access to the

adit and require future debris to be removed from the river corridor. We understand that DWR will likely be concerned about cost but this essential restoration activity should be covered by the State Water Project. There should be no assumption that this flat can continued to be used in perpetuity for debris storage.

### **Piru Ponds Restoration**

Downstream of the flat where the Angeles Tunnel adit is located, there are the so called “Piru Ponds” to the west of the road. This is actually the former streambed of Piru Creek. It seems likely that this river bend was closed off and the creek rerouted east of the highway to avoid the cost of building two bridges. It also seems likely that this reroute has adversely affected the ecological functions of the creek. The CRMP should consider including a potential future management to determine the need, efficacy, and cost of restoring the original streambed.

### **Former USGS Gauge Station**

The USGS has removed the stream gauge but left the concrete structure that formed the pool in which the gauge was located. The structure was grandfathered into the Recreational segment which permits past impoundments or diversions. Since it is no longer needed, the CRMP should include as a management action a request that USGS remove the structure as well as the gauge and work with DWR and the Forest Service to stabilize the adjacent eroded banks. If the former creek bed known as the Piru Ponds is restored, this action would not be needed.

### **Recreational Facilities and Signage**

The CRMP should include as a management action providing reasonable access for whitewater boaters to the stream somewhere in the vicinity of DWR’s access bridge to Pyramid Dam. This should include a dedicated parking area and a trail of sufficient size to allow boaters to carry their kayaks down to the creek. It should also include a permit mechanism to allow boaters motorized access beyond the Frenchman’s Flat gate on days when whitewater releases are available.

The flat currently used to store Angeles Tunnel debris is one of the few large flat areas in the Recreational segment. It potentially could be an ideal campground or environmental education camp site. This should be considered in the CRMP as a potential future management action.

Visitors to the Recreational segment can be confused by the wide variety of signs in disrepair in the Recreational segment. The CRMP should include a comprehensive signage strategy that is coordinated with various partner agencies (DWR, CDFW, FRVC, etc.).

## Encouraging CDFW to Enforce Fishing Regulations

The CRMP should include a Forest Service action to urge the California Department of Fish and Wildlife to regularly patrol the Frenchman's Flat area and the catch and release segment upstream. More signage is needed to educate visitors about fishing regulations.

Thank you for considering our comments. We collectively are looking forward to working with the Forest Service on protecting the free-flowing character and outstanding values of the Piru Creek Wild and Scenic River.

Sincerely,



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Also signing for:

Scott Harding, Stewardship Associate, American Whitewater  
Anthea Raymond, California Director, American Canoe Association  
Anthea Raymon, Club Contact, Los Angeles Kayak Club  
Carla Mena, Director of Policy & Legislative Affairs, Los Padres Forest Watch  
Dianne Erskine-Hellrigel, Executive Director, Community Hiking Club  
Alasdair Coyne, Conservation Director, Keep the Sespe Wild  
Jim Hines, Conservation Chair, Santa Barbara-Ventura Chapter Sierra Club