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April 16, 2024

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

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

**Re: Piru Creek Draft Comprehensive River Management Plan**

Dear Supervisor Torres:

Thank you for the opportunity to comment on the Piru Creek Wild and Scenic River Draft Comprehensive River Management Plan (CRMP) and the accompanying 2024 River Values Assessment (Assessment). We value the efforts of the Angeles and Los Padres National Forest staff in preparing these documents and appreciate the chance to discuss them during the April 12 on-site meeting at Piru Creek.

We believe that the whitewater recreation values of Piru Creek clearly meet the criteria for classification as an Outstandingly Remarkable Value (ORV) under agency guidelines. This letter provides additional data and narrative to support our position, emphasizing the unique whitewater recreation resources of Wild and Scenic Piru Creek. Our primary focus is on the River Values Assessment, Appendix A of the CRMP.

Alongside this individual submission, American Whitewater has contributed to a group comment letter with CalWild and other stakeholders, dated April 16, 2024. Our intent is to detail the specific concerns about whitewater recreation in this letter, while the group letter addresses broader issues.

**Whitewater Recreation on Wild and Scenic Piru Creek**

Whitewater boaters have been paddling Piru Creek between Pyramid Dam and Lake Piru since at least the 1980s, mostly in hardshell kayaks, although it is suited to other small craft such as inflatable kayaks, packrafts, and even stand-up paddle boards. As the nearest whitewater

stream for Los Angeles area residents, Piru Creek offers a valuable and accessible recreation opportunity that is significantly closer than other Southern California rivers like the Kern.

Based on the difficulty and character of its whitewater, Piru Creek is divided into two distinct whitewater boating runs:

- 1) The Pyramid Run: between the Pyramid Dam bridge and Frenchmans Flat, this road-accessible segment offers intermediate and advanced skill level boaters a high-quality experience through a stunning gorge full of rapids and interspersed with short, tranquil stretches.
- 2) The Wilderness Run: Extending from Frenchmans Flat to Lake Piru, this roadless stretch presents a remote and challenging day-long expedition through a vertical-walled canyon featuring numerous Class IV rapids and typically requiring at least one portage.

Both runs are distinguished by their unique characteristics and provide exceptional recreational experiences that are rare in the Metropolitan Southern California Region. These whitewater opportunities draw enthusiasts from both within and outside the region, highlighting the significance and value of Piru Creek's whitewater recreation.

## Comments on the Draft CRMP and 2024 Final River Values Assessment

The Final River Values Assessment concludes that recreational values on Piru Creek are not outstandingly remarkable. We strongly disagree with this finding, and believe that Piru Creek indeed possesses whitewater recreation opportunities that qualify as Outstandingly Remarkable Values (ORV) according to Forest Service guidelines. The creek's offerings are not only of high quality but are exceedingly rare within the Metropolitan Southern California Region, drawing visitors from both nearby and far beyond.

### **Comment 1: Whitewater boaters find Piru Creek's whitewater recreation opportunities to be of high quality, yet the Final Values Assessment does not consider their input.**

The people who have experienced Piru Creek's whitewater recreation know it best, yet the Assessment does not sufficiently acknowledge the high quality of Piru Creek's whitewater recreation as attested by boaters. Those who have experienced Piru Creek firsthand offer rich, descriptive insights that illustrate the exceptional recreational value of the creek, which starkly contrasts with the negative conclusions drawn in the Assessment. For example, experienced Piru kayaker and photographer Gary Vallé vividly captures the essence and allure of the creek, stating:

*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>1</sup>*

Piru Creek's *Pyramid Run*, from Pyramid Dam bridge to Frenchmans Flat, is among the finest small desert streams with whitewater recreation opportunities in the Pacific Southwest. It offers an intimate experience of floating through a scenic gorge with spectacular views and stunning geological displays. This setting is part and parcel of the recreational experience and contributes to its overall high quality. Rapids are fun and consistently paced, allowing intermediate and advanced level boaters to find challenges as well as moments of calm. Its accessibility by road contributes to the ease and frequency with which it can be enjoyed—flows willing—making for a day of boating that is free of complex or time-consuming logistics. A short section of beginner-friendly Class II whitewater between the Golden State Highway and Frenchmans Flat provides a short but high quality stretch for learning and teaching. Inexplicably, the Final Values Assessment does recognize the existence of the Pyramid Run (see comment 2, below).

Piru Creek's *Wilderness Run* from Frenchmans Flat to Lake Piru offers a unique whitewater expedition that can be completed within a single day. In a tight canyon with stunning scenery and geology—both of which are recognized as ORVs—the whitewater recreation experience is colored by its spectacular setting. Numerous Class IV rapids and at least one portage provide for on-water challenge and exploration for advanced to expert boaters. Very few whitewater recreation opportunities provide access to wilderness canyons but, lacking any trails or easy access by foot, Piru Creek is the perfect domain for travel by whitewater boat and it is, in fact, the only way to traverse Piru Creek's wilderness canyon without mounting a multi-day expedition that involves walking, wading, and swimming. This whitewater recreation opportunity is high quality and both unique and rare within the region.

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<sup>1</sup> Sierra Photography, "Kayaking Piru Creek, Frenchmans Flat Campground to Lake Piru," accessed April 16, 2024, <https://www.sierraphotography.com/creeking/piru02.htm>.

Recommendation for Revision: A revised Assessment should integrate information and perspectives provided by whitewater boaters to give a more informed view of Piru Creek's whitewater recreation opportunities. As written, the Assessment and CRMP do not provide any substantiation for their implicit determinations that Piru's Creek whitewater opportunities are not of high quality.

**Comment 2: The Final River Values Assessment omits evaluation of the Pyramid Run and therefore does not consider the full geographic scope of Wild and Scenic Piru Creek's whitewater recreation opportunities.**

Despite the Pyramid Run's easy accessibility, popularity among whitewater boaters, and detailed documentation including a boating study by DWR in 2019, the Final River Values Assessment fails to mention this key section of Piru Creek. This run is the most frequently boated section on all of Piru Creek.

By not evaluating the Pyramid Run, the Assessment does not accurately consider the full geographic and recreational scope of Piru Creek and has not properly evaluated both designated reaches of Piru Creek for a whitewater recreation ORV. This is a significant oversight that must be corrected.

Recommendation for Revision: A revised Assessment should thoroughly evaluate both the Pyramid and Wilderness Runs.

**Comment 3: Piru Creek's whitewater recreation opportunities are rare within the region of comparison.**

The Assessment (p. 8) underestimates the rarity of Piru Creek's recreational opportunities, finding that its "recreational opportunities are similar to several other rivers in the region of comparison and are not unique or rare."

However, this claim lacks support as the Assessment does not provide an evaluation of Piru Creek's whitewater recreation compared to other rivers in the region of comparison. Although the Assessment notes on page 9 that other rivers like the Santa Clara, San Gabriel, Ventura, and Los Angeles Rivers also have inconsistent flows, it fails to conduct a thorough comparative analysis of these rivers' whitewater recreation opportunities, thereby undermining the validity of its conclusions about Piru Creek's similarity to other streams. The Assessment does not evaluate the distinctive qualities of Piru Creek's whitewater opportunities and its more frequent and predictable flow regime.

Conducting a comparative evaluation is straightforward and limited in scope due to the small number of whitewater streams in the region. According to the National Whitewater Inventory by American Whitewater, which is the definitive database for whitewater boating runs, there are only 10 other streams in the region that are documented for whitewater use (Table 1).

River	Section	Miles	Class	More Info
Elizabeth Lake Canyon Creek	Warm Springs Camp to Castaic Lake	4.5	III-IV	<a href="#">More Info</a>
Escondido Creek	San Elijo Canyon	6.9	III-IV	<a href="#">More Info</a>
Piru Creek	1) Upper	31.2	I-V	<a href="#">More Info</a>
Piru Creek	2) Pyramid Dam to Frenchmans Flat	2.4	III-IV	<a href="#">More Info</a>
Piru Creek	3) Frenchmans Flat to Lake Piru	19.0	IV	<a href="#">More Info</a>
Piru Creek	4) Lake Piru to Santa Clara River	6.7	II+(III)	<a href="#">More Info</a>
San Antonio Creek	Mt. Baldy Road to San Antonio Dam	0.3	IV	<a href="#">More Info</a>
San Gabriel, East Fork	Eldoraville Camp to Reservoir	4.1	II-III+	<a href="#">More Info</a>
San Gabriel, North Fork	Bichota Canyon to West Fork	3.1	III-IV+(V)	<a href="#">More Info</a>
Santa Clara	Highway 126 (at Fillmore) to McGrath Beach State Park	25.2	II-III	<a href="#">More Info</a>
Santa Margarita	Murrieta Creek to Sandia Creek Rd.	9.9	IV(V)	<a href="#">More Info</a>
Sespe Creek	Lion Campground to Fillmore	33	IV-V	<a href="#">More Info</a>

**Table 1:** Whitewater boating runs within the six-county Metropolitan Southern California Region that are documented in American Whitewater’s National Whitewater Inventory as of April 15, 2024.

Among the documented whitewater runs in the region, only Sespe Creek offers a boating experience somewhat comparable to Piru Creek's Wilderness Run. However, Piru Creek provides more predictable and consistent flows, easier access, fewer use restrictions, and a less challenging level of whitewater difficulty. While Sespe Creek requires a multi-day journey, Piru Creek's Wilderness Run is typically completed in just one day. Due to these traits, Piru Creek remains more popular than Sespe Creek. No other whitewater boating runs in the region compare to Piru Creek's Pyramid Run.

Regarding the other rivers mentioned in the Assessment (p. 9), the Santa Clara River only offers brief boating opportunities under flood-like conditions, and the San Gabriel River provides

limited whitewater recreation on two of its forks. Neither the Ventura nor the Los Angeles Rivers offer whitewater recreation opportunities.

Piru Creek stands out in the region for its combination of high-quality, easily accessible roadside and wilderness boating opportunities. It boasts more predictable flows and more boatable days than other regional whitewater streams, enhanced by intrabasin transfers from the South State Water Project. Furthermore, Piru Creek is the only stream in the region that will benefit from flow enhancements due to a federal hydropower license requirement.

Recommendation for Revision: The revised assessment should include a comparative analysis of whitewater opportunities between Piru Creek and other regional streams.

**Comment 4: Whitewater boaters travel from throughout the region of comparison and from outside of it to enjoy Piru Creek’s whitewater recreation opportunities.**

The Assessment claims that whitewater boating on Piru Creek does not draw visitors from outside the region. This assertion is unsupported by data or analysis. During the site visit on April 12, 2024, Forest Service staff confirmed that the agency has not conducted any boater surveys that may provide such information.

Not only is the claim wholly unsubstantiated, but it incorrectly addresses the recreation ORV evaluation criteria that recreation opportunities “attract, or have the potential to attract, visitors from throughout or beyond the region of comparison” (emphases added). Visitors need not come from outside the region to fulfill the evaluation criteria.

Contrary to the Assessment's assertions, there is substantial evidence that Piru Creek attracts a significant number of boaters from beyond the region of comparison. For instance, in a 2019 whitewater boating flow study conducted by DWR as part of its federal hydropower relicensing process, out of seventeen participant boaters, nine (53%) traveled to Piru Creek from outside the Southern California Metropolitan Region.

Furthermore, American Whitewater's new subscription service for Piru Creek flow notifications, which provides subscribers with updates on boatable flows, has registered significant interest from outside the region. As of April 11, 2024, the service has 29 subscribers, 25 of whom (86%) are from outside the Southern California Metropolitan Region, illustrating the wide appeal and potential of Piru Creek to attract visitors from outside the region of comparison.

Both these datasets are available from American Whitewater upon request.

Recommendation for Revision: The revised Assessment should incorporate actual visitor data and information on boater origins to accurately reflect the geographic draw of Piru Creek.

**Comment 5: Piru Creek’s flow regime is characteristic of all similar desert streams and does not diminish its whitewater recreation value.**

The Assessment (p. 9) states that Piru Creek’s “potential for whitewater boating is constrained due to flows...” While it is correct that whitewater boating requires sufficient flows, the very nature of Piru Creek and other similar desert streams is that they do not always have flows that support boating. The Assessment fails to capture the nature of desert streams and the inherent value of their episodic boatable flows, which, although not continuous, provide unique and high-quality whitewater recreation opportunities that are highly sought after.

The episodic nature of boatable flows does not mean that the whitewater recreation opportunities are not high quality, that they are not rare within the region, or that boaters will not travel to enjoy them. It simply means that they are not always available. There is no requirement in the Wild and Scenic Rivers Act or the Forest Service’s evaluation criteria that a river’s recreational opportunities always be present.

Other designated Wild and Scenic Rivers with a recreation ORV but intermittent or highly variable seasonal flows include Fossil Creek, Arizona and East Rosebud Creek in Montana, which has a whitewater recreation ORV yet does not have boatable flows every year.

The Assessment (p. 8) cites DWR’s analysis of whitewater boating opportunities from October 24, 2007 through 2017. Half of this period was during a sustained, multi-year drought. The analysis found that Piru Creek had between zero and 16 days per year with flows of 200 CFS or greater.

Now, in April 2024, there are more than six additional years of flow data available for Piru Creek from 2018 through April 2024, including dry, normal, wet, and very wet years. The Assessment should consider this data to develop a more informed perspective on Piru Creek flows in a whitewater recreation context.

To assist with this, American Whitewater has completed a more current and sophisticated analysis of Piru Creek’s flow data and presents the results here.

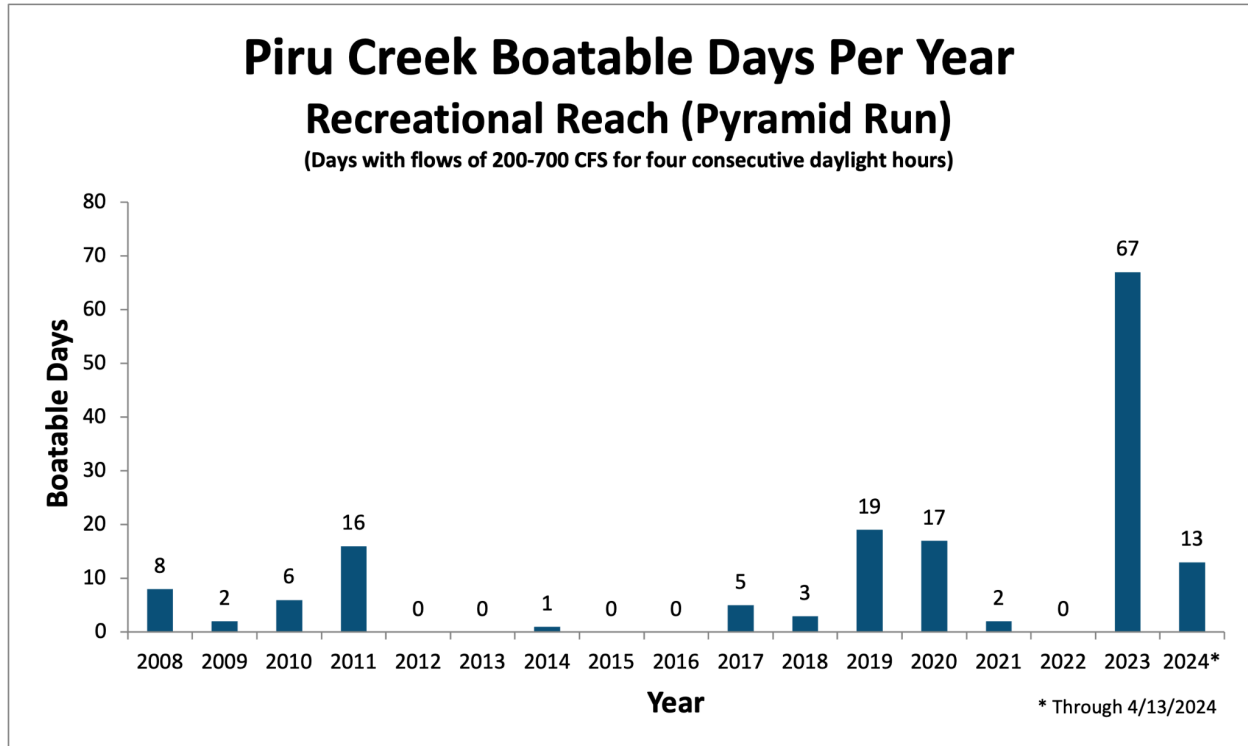
To understand Piru Creek's flows in relation to whitewater recreation, we utilize the concept of *boatable days*. Simply put, a boatable day is any day when stream flows are within the range that provides for a whitewater boating during daylight hours. For a boater, these are the days that matter.

Wild and Scenic Piru Creek has two distinct whitewater boating reaches, each with different criteria for determining a boatable day. For the Pyramid Run ending at Frenchmans Flat, a boatable day is defined as a day with between 200 and 700 CFS released from Pyramid Dam for four consecutive daylight hours. The boatable day flow range is the same for Piru Creek's Wilderness Run but because the run is longer, a boatable day must have eight consecutive daylight hours of boatable flows.

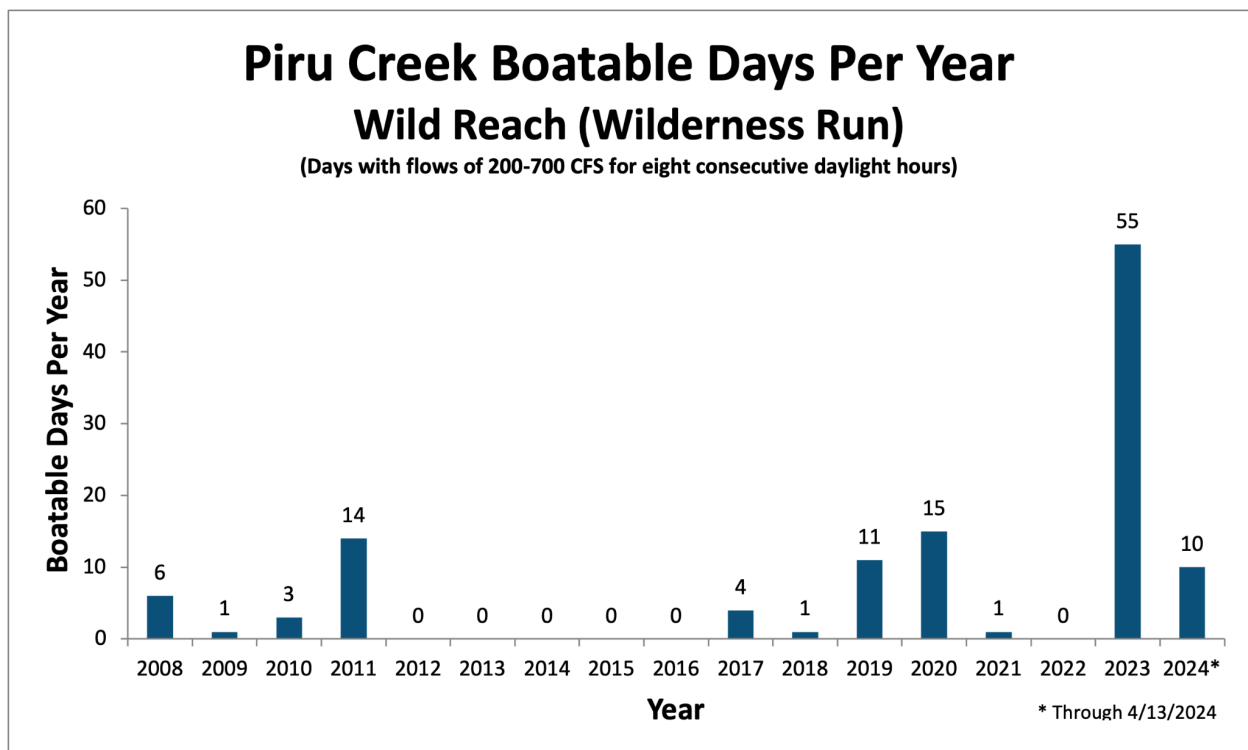
Our analysis indicates that between January 1, 2008 and April 13, 2024, Piru Creek's Pyramid Run had between 0 and 67 boatable days per year (Figure 1). The Wilderness Run had between 0 and 55 days (Figure 2). Boatable days were spread across six months of the year, with January through April having the greatest number of days for both runs (Figure 3 & Figure 4).

This is a significant number of boatable days spread across many months of the year in relatively wet years. It indicates that whitewater boating is a recreational opportunity on Piru Creek's Pyramid Run with as much frequency as can be expected for any stream in an arid region and that flows do support a whitewater recreation ORV.

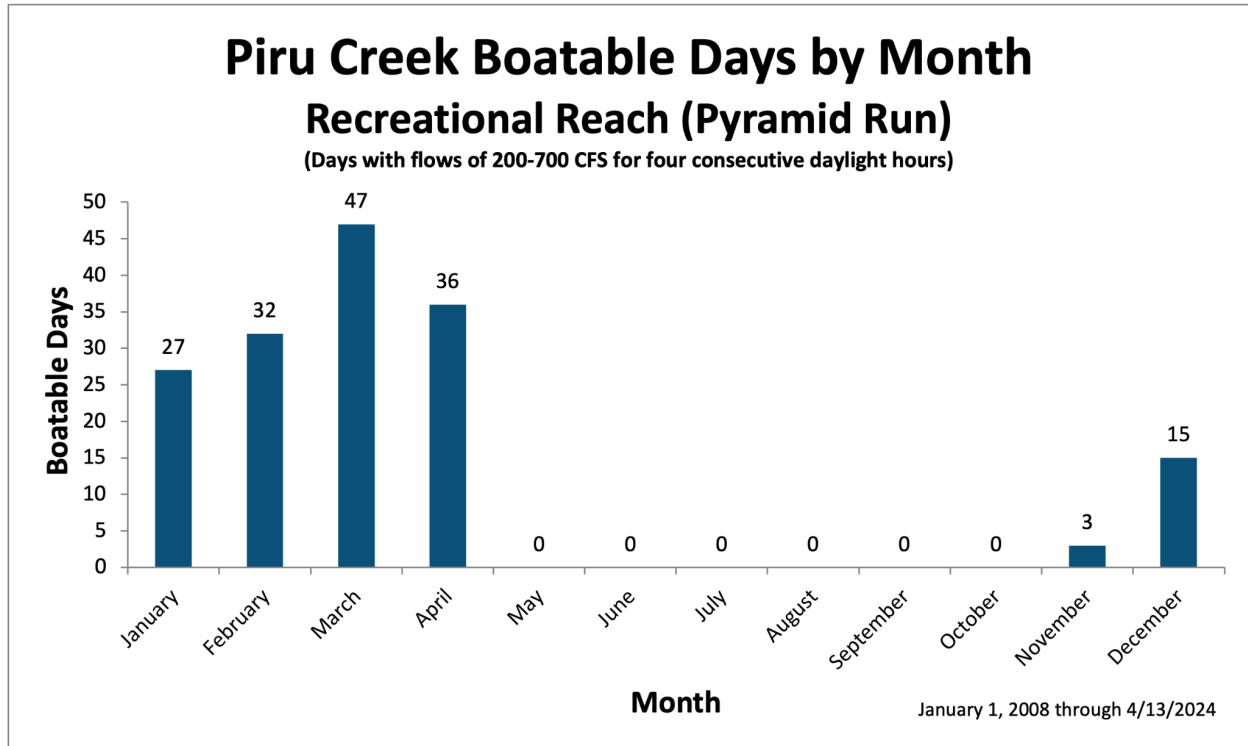




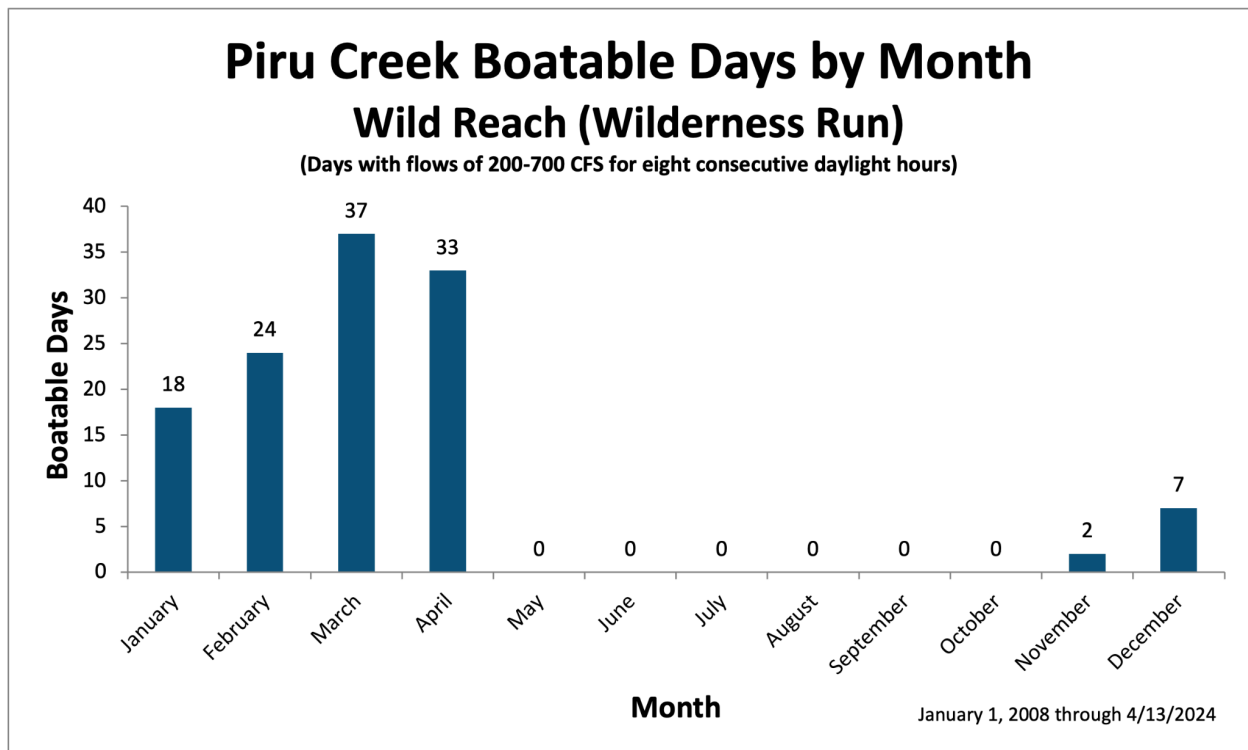
**Figure 1:** Boatable days per year on Piru Creek’s Pyramid Run for January 2008-April 2024.



**Figure 2:** Boatable days per year on Piru Creek’s Wilderness Run for January 2008-April 2024.



**Figure 3:** Boatable days by month on Piru Creek’s Pyramid Run for January 2008-April 2024.



**Figure 4:** Boatable days by month on Piru Creek’s Wilderness Run for January 2008-April 2024.

Piru Creek benefits uniquely from augmented flows provided by intrabasin transfers from the South State Water Project. These transfers increase the water levels during contractual deliveries from Pyramid Lake to Lake Piru, enhancing the number of boatable days beyond those generated by natural watershed flows. This situation is exclusive to Piru Creek within the region, providing enhanced whitewater recreation on both the Pyramid and Wilderness runs.

Future changes to dam operations, as part of the upcoming renewal of the federal license for the South State Water Project, will further increase these benefits. The California State Water Resources Control Board has issued a Clean Water Act Section 401 Certification for this new license, amended in March 2023 to include Condition 5(A). This condition mandates the Department of Water Resources to use specified ramping rates that facilitate whitewater boating during water deliveries to the United Water Conservation District (UWCD) via Piru Creek, potentially adding up to six more boatable days per year.

Additionally, the amended 401 Certification under Condition 5(B) opens possibilities for the Department of Water Resources to consider additional water deliveries to UWCD. This could allow adjustments in flow management to further benefit whitewater recreation, potentially increasing the number of boatable days even more if these changes are implemented.

Recommendation for Revision: The revised Assessment should accurately portray the benefits of Piru Creek's intermittent flows, recognizing them as a characteristic feature of desert stream ecosystems that contribute positively to the whitewater recreational value. It should also detail how managed flow events supplement natural flows, enhancing the creek's whitewater boating opportunities. Incorporate an analysis of boatable days based on historical flow data.

**Comment 6: The Assessment misunderstands whitewater recreation in several statements.**

The Assessment contains several misconceptions about the nature of whitewater recreation on Piru Creek

It presents "challenging topography" as a detrimental quality, not recognizing that nearly all whitewater streams are found in areas where rugged topography provides the gradient that is essential in a river bed in order for whitewater to be created. Beyond helping form rapids, topography contributes to the scenery and setting for whitewater recreation. If anything, "challenging topography" is an essential contributor to Piru Creek's whitewater resources.

The need to "portage some sections" of Piru Creek is presented as a detractor to whitewater recreation. While most boaters generally prefer not to portage, it is an essential and common

aspect of whitewater boating, especially on smaller streams. Like a mountain biker that may need to periodically step off their bike to walk around a particularly rocky or brushy section of a trail, boaters sometimes need to step out of their boats and walk around obstacles and hazards too. It is a fundamental component of boating.

It is true that vegetation intrudes into Piru Creek's channel and that whitewater boaters will encounter it on the creek. This, too, is common in boating and particularly so for small streams in arid areas with highly variable flows. It is not a constraint on boating Piru Creek but rather is a natural part of the experience. Its presence is dynamic, not static—increasing during periods of low flow and decreasing following high flow events that scour the creek's banks and bed. For example, during our field visit on April 12, 2024, it was evident that recent high flows, which reached nearly 10,000 CFS in 2023, had significantly reduced the density of encroaching vegetation. This natural fluctuation in vegetation is also influenced by factors such as wildfires. The Department of Water Resources noted in its March 29, 2024 comments on the draft CRMP that “[l]arge storm events are likely to cause scouring of the bed and banks of Piru Creek and displacement of emergent riparian vegetation which are part of the dynamic geomorphology of the Piru Creek system.”

The Assessment (p. 9) claims that the "lack of egress and the technical nature of rapids limit [whitewater boating] opportunities to experts." This overlooks the accessible Class III-IV whitewater of Piru Creek's Pyramid Run upstream of Frenchmans Flat, which is suitable for a broad range of intermediate to advanced boaters, not just experts. Furthermore, the description does not accurately reflect the Wilderness Run's Class IV rapids, which, while challenging, are navigable by advanced skill level kayakers. The lack of egress does increase the challenge but does not restrict the run exclusively to expert boaters. A well-prepared team of advanced level boaters with wilderness travel skills can successfully navigate this section. Finally, the technical nature of Piru Creek's rapids contribute to the whitewater experience rather than detracting from it. These distinctions are crucial for understanding Piru Creek's diverse whitewater recreation opportunities.

Recommendation for Revision: The Assessment should be corrected to accurately reflect Piru Creek's whitewater recreation opportunities. Remove presumptive conclusions and statements about whitewater recreation and replace them with a better informed and substantiated description of Piru Creek whitewater recreation resources. Consult with whitewater boaters and organizations to get appropriate perspectives and information where needed.

## Conclusion

We appreciate the opportunity to provide these comments and trust that our perspectives will contribute positively to the revision of the River Values Assessment and Draft Comprehensive River Management Plan for Piru Creek. We are grateful for the efforts of the Forest Service in managing this special whitewater stream and look forward to continued collaboration. We are hopeful that the revised plan will fully reflect the unique values and recreational opportunities that Piru Creek offers, ensuring its protection for the benefit and enjoyment of present and future generations.

Sincerely,

A handwritten signature in black ink that reads "Scott Harding". The signature is written in a cursive, flowing style.

Scott Harding  
Stewardship Associate  
American Whitewater