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Comments: I appreciate the opportunity to comment on the Draft Comprehensive River Management Plan for Piru Creek. I am disappointed to find that the draft plan did not identify "Recreation" as having "outstandingly remarkable values". I feel that Piru Creek has the best 1-day Wilderness paddling values of any road accessible river in Southern California. I fear that the inaccurate characterizations of these values will prevent this resource from being equitably managed in relicensing agreements.

My experience in Southern California rivers is broad and extensive. I am a Geography and Environmental Science professor whose academic background is in fluvial hydrology. I am also a whitewater rafter and kayaker. I participated in the paddling flow study on the Wild section of Piru Creek. I have been exploring and paddling Southern California rivers since 1996 and have run dozens of sections of streams in this region of the state, participating in numerous first descents.

I know of no other stream that provides roadside put-in and takeout access accommodating such an awe-inspiring 1-day Wilderness experience. The only similar river-accessible canyon in Southern California is Sespe Creek, which is a class V multi-day trip. Piru Creek requires only 1 portage from class IV boaters. This is not restricted to "Experts", as the draft plan implies.

The draft report under-rates the value of Piru Creek's Wilderness compared to other rivers. It is without a doubt higher quality than the Los Angeles and San Gabriel drainages, two examples that were used in the draft report. Neither of these canyons have road-accessible Wilderness runs (rivers where roads provide access for put-in and takeout but do not traverse the river itself).

The geologic resources are one of the main motivations that whitewater paddlers would paddle this section of river, so the statement "The geologic interpretive uses are primarily academic (see Geology section) and are limited by lack of access to the wild segment of Piru Creek." from the draft report could be rephrased as, "The geologic uses are enhanced by the Wilderness character afforded by paddling the wild segment of Piru Creek". There is an invalid presumption that geologists and whitewater paddlers are not the same users, and that remoteness detracts from the geologic value. I regularly paddle with professors and researchers in various Earth Sciences, and it should not be surprising that leisure activities overlap with professional expertise.

I believe that revisiting the unique Wilderness character of Piru Creek will cause the Recreation values of the Wild segment to be found to be "remarkable and outstanding".