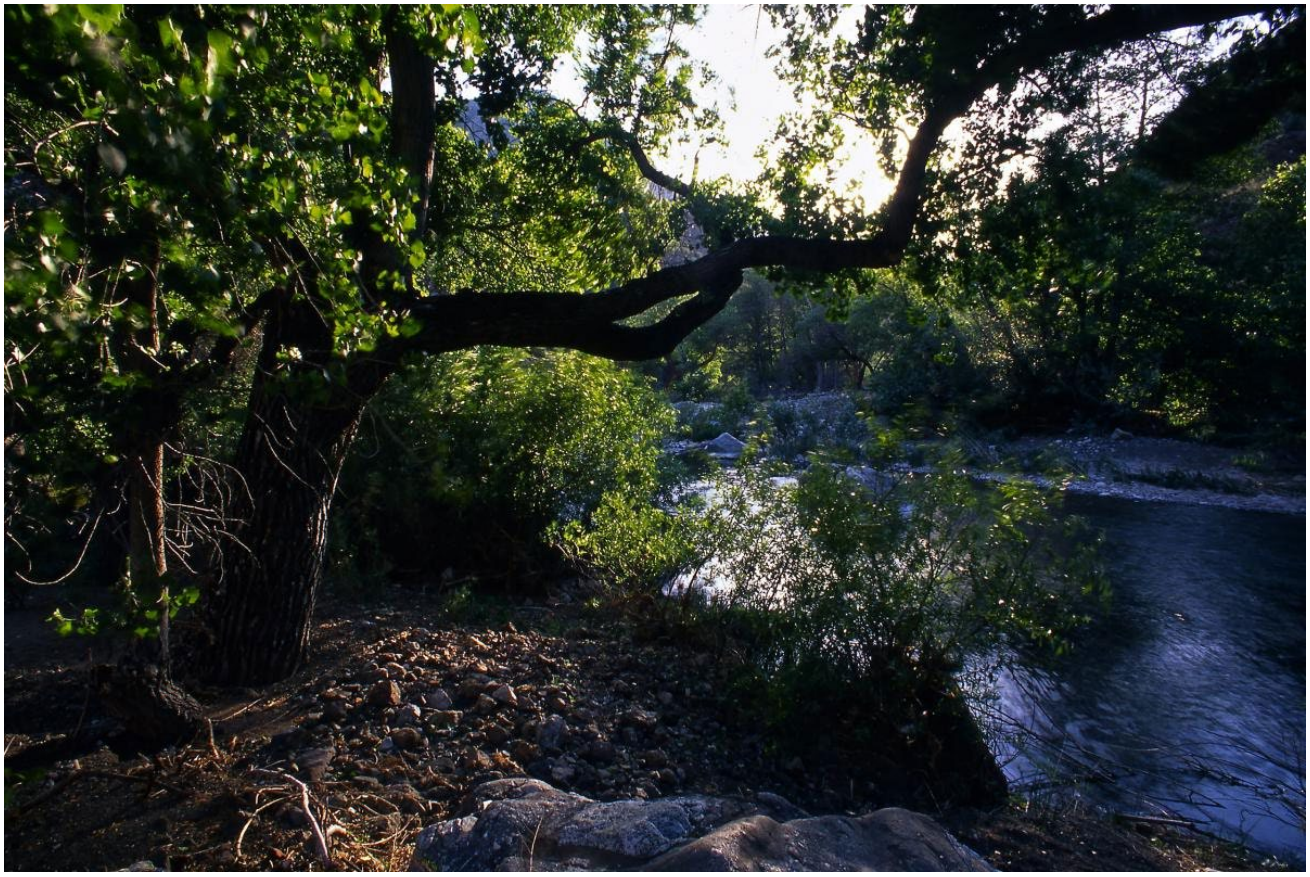
United States Department of Agriculture

Angeles National Forest
Los Padres National Forest

Piru Creek Wild and Scenic River Comprehensive River Management Plan

Environmental Assessment



Forest Service

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CHAPTER 1. PURPOSE AND NEED

INTRODUCTION

The Angeles and Los Padres National Forests (the Forests) are proposing to adopt a comprehensive river management plan (CRMP) for the designated sections of Piru Creek Wild and Scenic River (the river). The CRMP is administrative in nature; the actions proposed here include establishing a final boundary, establishing maximum user capacity levels, and providing programmatic management direction. The CRMP outlines the desired conditions in the river corridor (the area within the proposed final boundary) and proposes management actions to aid in achieving these conditions. However, it does not directly implement any ground-disturbing actions. All future projects in the river corridor would require site-specific National Environmental Policy Act (NEPA) analysis.

The river corridor has been managed as a designated wild and scenic river (WSR) since the 2009 Omnibus Public Land Management Act (Public Law 111-11 or "2009 Omnibus Act") added 7.25 miles of Piru Creek the National Wild and Scenic Rivers System.

This environmental assessment (EA) has been prepared in compliance with NEPA and other relevant federal laws and regulations[1]. This is not a decision document. The responsible official will document the decision regarding the CRMP following a 45-day objection filing period. The full text of the CRMP, including the River Values Assessment and User Capacity Analysis and (appended to the CRMP as Appendix A and Appendix B, respectively), is available to the public and can be accessed at the following link: https://www.fs.usda.gov/project/?project=58710.

This EA discloses the direct, indirect, and cumulative environmental effects that would result from the Proposed Action and No-Action Alternative. The document is organized into three chapters, as described below:

- **Chapter 1 (Purpose and Need)** includes information on the history of the CRMP, the purpose and need for the CRMP, and how the Forest Service (FS) informed the contents and management direction of the CRMP. Issues and concerns are identified in this chapter.
- **Chapter 2 (Alternatives)** provides a detailed description of the action and alternatives proposed by the FS. These alternatives were developed based on issues raised by the public or external agencies, concerns within FS, or some combination of these items.
- **Chapter 3 (Affected Environment and Environmental Consequences)** describes the environmental effects of implementing the Proposed Action or the No-Action Alternative. This analysis is organized by resource, such as scenery, botany, wildlife, etc. Each resource section begins with a description of the affected environment and current conditions. These provide a baseline for evaluating and comparing the alternatives.

[1] This EA was prepared in accordance with the 2020 and 2022 CEQ regulations for implementation of NEPA.

BACKGROUND

The Wild and Scenic Rivers Act ("the Act" or WSRA) was signed into law in 1968. The Act protects the free-flowing waters, water quality, and outstandingly remarkable values (ORVs) of many of our nation's most spectacular rivers. Some examples of ORVs that may distinguish wild and scenic rivers from others in the region include scenery, recreation, cultural/historical resources, and geology. The Act safeguards the special character of these rivers, while also recognizing the potential for appropriate use and development. The Act purposefully strives to balance river development with permanent protection for the nation's most outstanding free-flowing rivers.

Towards these ends, the Act prohibits federal support for actions, such as the construction of dams or other instream activities, that would adversely affect the river's free flowing condition, water quality, or ORVs. Designation neither prohibits development nor gives the federal government control over private property.

For each river, the Act has the following effects:

- River values (free-flowing condition, water quality, and ORVs) are protected and enhanced.
- Dams and other federally assisted water resource projects that would adversely affect river values are prohibited (Section 7 of the Act).
- The creation of a CRMP that addresses resource protection, development of lands and facilities, user capacities, and other management practices necessary to achieve the purposes of the Act is required (Section 3(d)(1) of the Act).

In 2009, Congress passed the *Omnibus Public Land Management Act* (Public Law 111-11 or "2009 Omnibus Act"). This added 7.25 miles of Piru Creek to the National Wild and Scenic Rivers System. Public Law 111-11 states that 4.25 miles of Piru Creek will be administered as a wild segment and 3 miles will be administered as a recreational segment.

Based upon the review of public input, evaluation of river corridor conditions, and need for action (see Purpose and Need below), the CRMP focuses on the following items:

- Resource protection, land use, user capacity, and other management practices
- Protection and enhancement of river values, including free-flowing conditions, water quality, and ORVs
- Compliance with the requirements of the WSRA

Classification

The Wild and Scenic Rivers Act requires that rivers or river segments are classified, designated, and administered as either wild, scenic, or recreational. The three classes represent a development scale and serve as a framework for future management; they are not synonymous with the river's ORVs. For example, a river segment may be designated as recreational even if recreation is not considered an ORV for the river.

The Forest Service conducted an eligibility study during the Forest Plan Revision process, at which time seven segments of Piru Creek were evaluated to determine whether they contained ORVs. The portions of

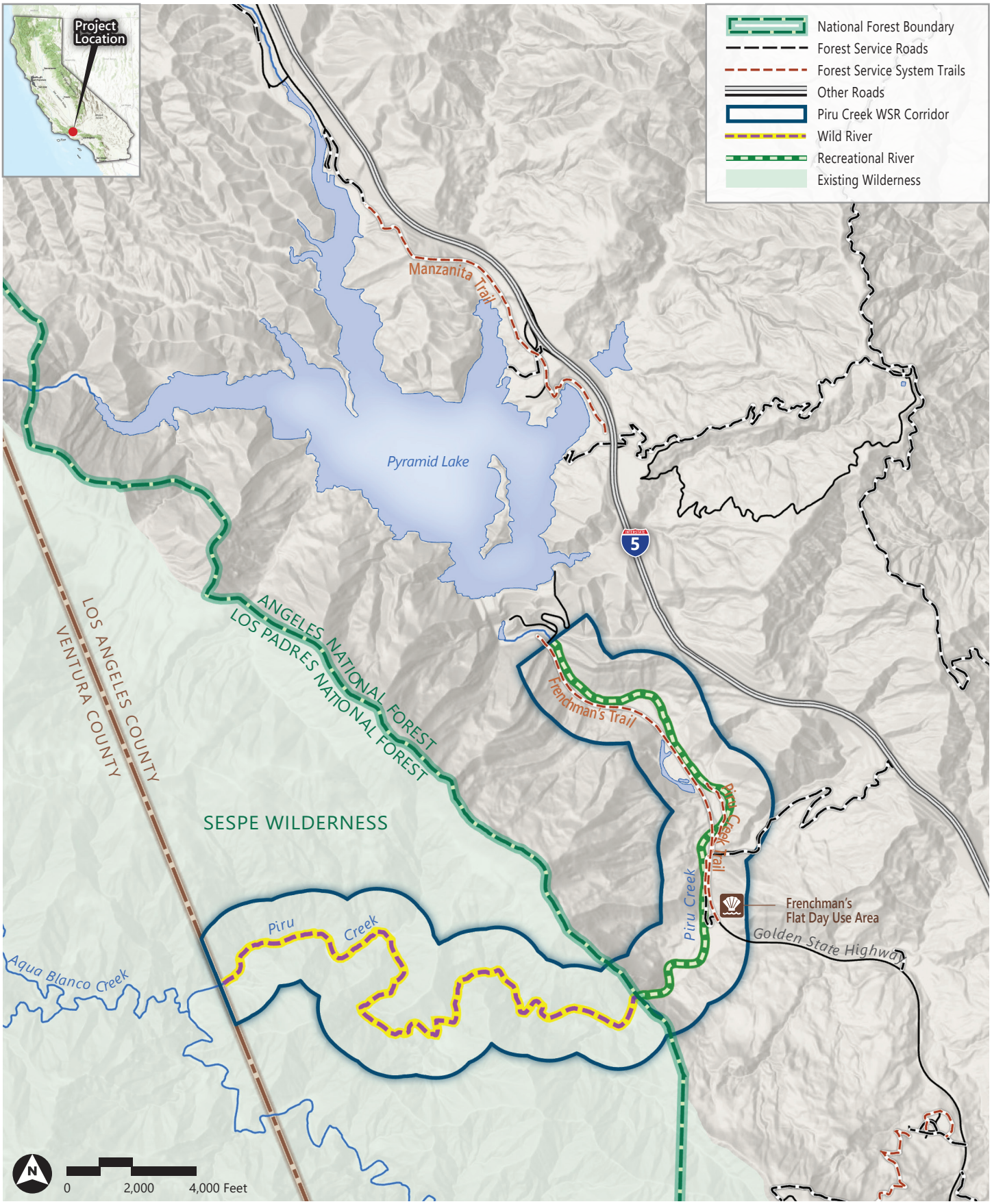
the river that were ultimately designated as a WSR (Segment 5 and part of Segment 6) were recorded as eligible in the 2006 Forest Plan Records of Decision. Geology was found to be an outstandingly remarkable value for the portion of the river that was designated as a WSR. Other values studied include scenery, recreation, fish and wildlife, cultural, historic, and botanical resources. These were initially found not to be outstandingly remarkable in lower Piru Creek (Segment 5 and part of Segment 6) when viewed within the region of comparison. Following the public review of the EA, wildlife was found to be an outstandingly remarkable value throughout the corridor[2]. Figure 1 shows the location of each segment.

During the scoping period for this EA, the CRMP was released for review and comment by the public. During this time, the Forest Service received comments and input from members of the public, organizations, and local water authorities.

A total of 7.25 miles of Piru Creek is designated as WSR (Figure 1). A total of 4.25 miles of the river are classified as wild, and 3 miles are classified as recreational. The wild segment is administered by the Los Padres National Forest and the recreational segment is administered by the Angeles National Forest.

The wild segment extends from the boundary of the Sespe Wilderness to the boundary between Los Angeles and Ventura counties. The recreational segment extends from 0.5 miles downstream of Pyramid Dam at the first bridge crossing to the boundary of the Sespe Wilderness.

[2] The outstandingly remarkable values in the corridor are Geology, Fisheries, Wildlife, Scenery, and Recreation in the Wild segment and Geology, Fisheries, and Wildlife in the Recreational Segment. See Table 1.



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

Outstandingly Remarkable Values

The Act requires that each river possess one or more ORVs to qualify for WSR designation. To be described as outstandingly remarkable, a value must be river-related and a unique, rare, or exemplary feature that is significant at a comparative regional or national scale. While the spectrum of resources that may be considered is broad, all ORVs must be directly river related.

Per Public Law 102-301 in 1992, Piru Creek was considered as a potential addition to the National Wild and Scenic River System. The Forest Service conducted an eligibility study during the Forest Plan Revision process, at which time seven segments of Piru Creek were evaluated to determine whether they contained ORVs. The portions of the river that were ultimately designated as a WSR (Segment 5 and part of Segment 6) were recorded as eligible in the 2006 Forest Plan Records of Decision. Geology was found to be an outstandingly remarkable value for the portion of the river that was designated as a WSR. Other values studied include scenery, recreation, fish and wildlife, cultural, historic, and botanical resources. These were initially found not to be outstandingly remarkable in lower Piru Creek (Segment 5 and part of Segment 6) when viewed within the region of comparison.

In 2020, a Forest Service interdisciplinary team convened to complete a new river values assessment as part of the CRMP development process, in order to review and validate previous findings about river values specific to the designated segments of Piru Creek. The river values evaluation process is further described in Appendix A to the CRMP. The interdisciplinary team included specialists in the following areas: hydrology, geology, fisheries, wildlife, botany, recreation, and archeology. Worksheets were prepared for each of the two designated river segments, for each value, to assess existing conditions, changes, values, and potential indicators. During this time, the team determined that fisheries in the wild segment of Piru Creek are outstandingly remarkable and added this as an ORV to the WSR, whereas it was not initially considered outstandingly remarkable during the eligibility study in 2006. Additionally, fisheries was added as an ORV in the recreation section following comments received on the River Values Report in 2023. Upon further analysis, it was determined that because the existing fish population shares the same genetic traits as the population in the wild section, it was warranted they would be listed as an ORV in the recreation section. Upon further analysis of the river values assessment, scenery was also determined to be outstandingly remarkable in the wild segment of the WSR.

In February 2024, the CRMP was released for public review and comment. Following this period, the Forest considered comments received and convened internally to discuss adding recreation as an ORV on the designated wild segment of Piru Creek. The Forest Service subsequently determined that recreation—specifically, whitewater boating—is an outstandingly remarkable value on the wild segment. For the recreational segment, recreational values are not considered outstandingly remarkable; thus, recreation is not an ORV for the recreational segment.

During a review of public comments on the draft Environmental Assessment and revised CRMP in October 2024, the Forests convened internally to discuss adding wildlife as an ORV on both the wild and recreational segments of Piru Creek The Forest Service subsequently determined that due to the remarkable diversity of terrestrial and riparian wildlife habitat, and the unique population of condors, wildlife is an ORV for both segments.

The identified ORVs for the river are identified below in Table 1 and further described in the following section. Certain values did not qualify as ORVs because they did not meet the required criteria. To be considered river related, a value should be located in the river or its immediate environment (generally within ¼ mile on either side), contribute substantially to the functioning of the river ecosystem, owe its existence to the presence of the river, or some combination of these things. See the River Values Assessment (Appendix A to the CRMP) for additional detail about ORV findings and rationales, as well as the criteria used to define each ORV.

Table 1. Outstandingly Remarkable Values for Piru Creek

ORV Name	Recreational Segment	Wild Segment
Geology	Yes	Yes
Fisheries	Yes	Yes
Wildlife	Yes	Yes
Scenery	No	Yes
Recreation	No	Yes
Historic and Cultural	No	No
Botany	No	No

PURPOSE OF AND NEED FOR THE PROPOSAL

The purpose is to adopt a CRMP to protect and enhance the values for which the river was designated, including free-flowing water, water quality, and the ORVs identified; Section 3 of the Wild and Scenic Rivers Act (16 USC 1274, as amended) states that a CRMP will be developed for the designated river corridor. By designating Piru Creek as a WSR, Congress directed the FS to develop a CRMP for the river, which lies under their jurisdiction. The CRMP also identifies potential management actions needed to protect these values within the river corridor.

The need is to develop a plan to integrate management of multiple resources, resource designations, and activities in the river corridor. Management of uses on public lands is necessary in this congressionally designated area to address private, public, and administrative access needs; protect resources; promote public safety; and minimize conflicts related to the uses of public lands.

PROJECT AREA

Piru Creek is located in Los Angeles County and flows through the Los Padres and Angeles National Forests. Piru Creek drains the Sespe Wilderness and flows into the Santa Clara River. The WSR segment of Piru Creek lies to the west of the Golden State Highway and south of Pyramid Lake.

The recreational segment of Piru Creek is located on the Angeles National Forest and begins one-half mile downstream of Pyramid Lake Dam at the first bridge crossing, continuing downstream to the boundary of the Sespe Wilderness. The wild segment of the WSR is located within Los Padres National

Forest from the Sespe Wilderness boundary to the boundary between Los Angeles and Ventura counties (2009 Omnibus Act).

PUBLIC INVOLVEMENT, TRIBAL CONSULTATION, AND COORDINATION WITH OTHER INTERESTED PARTIES

Public Involvement

The proposal has been listed in the Angeles National Forest's Schedule of Proposed Actions (SOPA), with a specific project website in the Angeles National Forest's Projects page since July 2022, when a draft River Values Report was posted for public comment. A second public scoping notice, for the availability of the Draft CRMP, was then posted on the Forest Service project website and provided to the public and other agencies for comment during a scoping period from February 27, 2024 to March 31, 2024. Scoping comments on the *Draft Piru Creek CRMP* were received from 99 commenters and included concerns about expansion of ORVs, in particular recreation, effects to state water project facilities in the corridor, fishing policies and species protections, and additional management actions.

At the request of several stakeholders, a public meeting at Piru Creek WSR was held by FS staff and officials in April 2024. Over a dozen individual stakeholders attended and shared valuable information that was reflected in specific comments on the CRMP. The comment period on the CRMP was extended to April 15 in order to allow for comments to reflect the discussion and information shared during the field visit.

The EA was posted on the Forest website and was provided to the public and other agencies for a 30-day comment period on October 28, 2024. Comments on the Piru Creek Wild and Scenic River Comprehensive River Management Plan Environmental Assessment were received from 8 commenters and included concerns about ORVs, flow data, and additional management actions. All correspondence was reviewed by the interdisciplinary team in order to address the comments. Table 1 in Appendix A lists the comments received and responses. The interdisciplinary team considered these comments while completing the Final EA.

Government to Government Tribal Consultation

Throughout the CRMP planning effort, the Forest Service has engaged with interested tribal parties. Formal Consultation with Federally Recognized Tribes who ascribe cultural affinity with this river segment was initiated on February 25, 2021, with the Santa Ynez Band of Chumash Indians and the Tejon Indian Tribe. Input during this consultation effort involved a request in identifying any rare, unique, or exemplary natural or cultural resources important to the Tribes. While no formal comments were received at this time in relation to ORVs, continuing consultation on the development of the CRMP is ongoing, and the agency will continue to engage interested tribal parties in river management issues in the future.

Coordination with other Interested Parties

Section 3(d)(1) of the Wild and Scenic Rivers Act also provides guidance in regard to coordination with others, and 36 CFR 800.2(c)(2)(ii)(F)(5) of the National Historic Preservation Act encourages consultation with certain individuals or groups who may have certain knowledge or demonstrated interest.

Consultation and outreach to 14 individuals and/or groups identified as point of contacts by the Native American Heritage Commission was initiated on March 2, 2021, comprising Native American contacts for both the Angeles National Forest and Los Padres National Forest. The Fernandeño-Tataviam Band of Mission Indians was the only group that responded. A meeting was held with a tribal representative on August 30, 2022, specifically as it related to input on ORVs, while consultation on the development of the CRMP is ongoing and was most recently discussed with a tribal representative during the onsite field visit for interested parties, that occurred on April 12, 2024.

ISSUES AND IMPACT TOPICS

NEPA regulations (40 CFR 1500.4[i]) stipulate the preparation of concise and analytical environmental documents by focusing on the issues that deserve study. Key issues are used to develop the project analysis, resource protection measures and/or in the development of alternatives to the Proposed Action, and are given special consideration by the decision maker. Guided by the Forest Plan (Forest Plan or LMP), the interdisciplinary team addressed the key issues identified during internal scoping as well as the public scoping process.

The following key issues were identified during the development of the CRMP:

- Resource protection, including impacts on water quality, hydrology, geology, scenery, fish, recreation, and climate change
- Development of lands and facilities
- User capacities

CHAPTER 2. ALTERNATIVES

This chapter describes the alternatives considered for managing the river corridor. The alternatives are compared, providing a basis for choice by the decision maker and the public. The FS is required by law to develop a CRMP that addresses resource protection, development of lands and facilities, user capacities, and other management practices necessary to meet the purposes of the Act.

No unresolved conflicts emerged from issues that fell within the scope of this project. Thus, this EA evaluates a single action alternative: the Proposed Action, in which the CRMP is adopted. A No-Action Alternative, in which management continues under existing standards and guidelines, applicable law, regulation, policy, Executive Orders, and special area plans (as applicable) with no adoption of the CRMP, is analyzed in this section as well. This No-Action Alternative provides a baseline for comparing environmental impacts related to the Proposed Action.

NO-ACTION ALTERNATIVE

Under the No-Action Alternative, the CRMP would not be adopted. Selecting not to adopt the CRMP would cause the Forest Service to be out of compliance with the Act. Section 7 of the Act states that Federal agencies must:

> *"protect federally designated rivers and congressionally authorized study rivers from the harmful effects of water resources projects. It requires evaluation of federally assisted water resources projects and a determination by the river-administering agency."* (IWSRCC, 2004)

The current Forest Plan and WSRA would continue to guide administration and management of Piru Creek WSR. Management would also continue to adhere to state water quality standards, existing FS policy 2670.32 (which directs management for FS Sensitive Species), and other applicable laws.

Projects proposed in the bed or banks of the designated river would continue to require a Section 7 determination under the Act. Section 7 requires evaluation of the effects of proposed water resources projects on river values. Even if the proposed project is outside of the designated river corridor, a Section 7 analysis may be done if the project would unreasonably diminish the river values present at the date of designation. Such project-specific analyses may include studies such as groundwater modelling.

Section 9 of the Act would continue to apply to the wild segment of the designated corridor; Section 9 withdraws a designated wild river segment from all forms of appropriation under mining and mineral leasing laws.

Under the No-Action Alternative, the interim boundary of "one-quarter mile from the ordinary high water mark on each side of the river" (from Section 4(d) of the Act) would continue to be used for management of the river corridor. A final, detailed river corridor boundary, as required in Section 3(b) of the Act, would not be established.

In addition to the Forest Plan, a variety of federal laws would continue to be applicable to the area, including but not limited to the Endangered Species Act (ESA), the Clean Water Act, the Clean Air Act, and the Wilderness Act. The ESA, for example, would continue to regulate the conservation and protection of endangered and threatened species and their habitats. The Migratory Bird Treaty Act (MBTA) would provide further protection to native bird species within the river corridor, and the Bald and Golden Eagle Protection Act of 1940 would continue to provide special protections for eagles, prohibiting take, possession, sale, transport, export, or import, as well as restricting potentially disturbing activities in the vicinity of eagle nests.

PROPOSED ACTION

The Proposed Action is the adoption of the *Piru Creek Wild and Scenic River Comprehensive River Management Plan*, which is incorporated herein by reference. The CRMP includes all existing management under the No-Action Alternative. In addition, the CRMP outlines desired conditions and management strategies to address issues and fulfill the purpose of the Act. The actions proposed in the CRMP are a combination of continued current management, as described in existing management plans, and additional management elements that were created for the protection of river values. Under the Proposed Action, the Forest Service would undertake the following actions that help protect outstandingly remarkable values (geology and fish for both segments, as well as scenery and recreation for the wild segment), free flow, and water quality:

- Authorize removal of surface rocks and minerals only within the recreational segment and limit the amount to smallest quantities needed for scientific or educational purposes. Ensure a qualified professional geologist reviews all requests for rock or mineral collection or removal.
- Encourage and promote access to the upper segment of the corridor (recreational segment) to geological classes, study groups, field trips, scientific research and the public in general. Coordination with DWR and other relevant authorities would take place prior to educational group visits.
- Develop an educational kiosk presenting the geological history and uniqueness of the region / corridor. This kiosk could be located at the Frenchman's Flat gate (the entry point to the corridor).
- Develop a Road Management Plan with DWR and other partners, including the following:
  - ❑ Best Management Practices to reduce non-natural sources of sedimentation, enhance safety, and manage woody debris.
  - ❑ Evaluation of the DWR adit access road for potential improvements to water quality and aquatic organism passage.[3]
  - ❑ Potential funding sources for road maintenance or improvement
  - ❑ Improvements to Old Highway 99 (the Golden State Highway) to reduce non-natural sources of sedimentation into Osito Canyon

[3] For further description of the adits, see below Hydrology section.

- Work with the US Geological Survey (USGS) to consider repair or removal for the stream gauge which is a barrier to fish and other aquatic organisms and may affect free flowing character.
- Focus improvements to the Frenchman's Flat recreation site on enhancing water quality and sustainability, and keeping recreational impacts concentrated in portions of the recreational segment of Piru Creek. Improvements may also consider equitable access in future designs.
  - ❑ Consider replacing and/or managing for decadent cottonwoods on outer riparian. Include a planting plan to provide shade and habitat in outer riparian zone and to improve user experience.
- Continue to support volunteers dedicated to monitoring and prompt removal of recreational, user-created dams, and other stewardship efforts.
- Review both Forest System Trails in the WSR corridor for location and data accuracy. Conduct a Trail Assessment and Condition Survey using Forest Service protocols.
- Continue full participation in FERC relicensing for Pyramid and Santa Felicia Dams, in order to implement Federal Power Act conditions for resource protection.
- To improve natural resource protection, partner with the California Department of Fish and Wildlife (CDFW) to enhance opportunities for presence within the WSR to enforce state code; prioritize the training and certification of recreation staff as Forest Protection Officers. Improve bilingual signage within the corridor to address fishing regulations.
- Collaborate with tribes in the area to improve interpretation of tribal history throughout the WSR corridor.
- Increase promotion of accessible, free recreational opportunities within the corridor for the local public. Promotion may include giveaways, special event days, collaboration with local schools and educational groups, etc.
- Monitor level of boating use as well as occurrence of search and rescue operations during winter releases governed by FERC license conditions to develop a baseline and determine if use or impacts from search and rescue operations increase over time.
- FS would adhere to its National Best Management Practices Program, developed to improve management of water quality consistent with the Clean Water Act.
- To protect condors, ensure signage and visitor information emphasizes threats from micro trash and encourages visitors to remove all signs of use including trash.
- Hold an annual meeting between Recreation staff and interagency Biologists to review ongoing wildlife impacts, species status, any new or changed information on species or habitats, and best practices for conservation.

Additional Protections

Additional protections addressed in the CRMP include establishing a final boundary for the river, establishing user capacity levels, implementing thresholds for action, establishing desired conditions for the river corridors, proposing additional management actions to protect and enhance river values to better align with the WSRA mandate, and proposing monitoring items. These components are addressed in further detail below.

River Boundary

The current interim boundary for the river from the Act includes one-quarter mile from the ordinary high water mark on both sides of the river, along all wild, scenic, and recreational segments. The proposed final boundary is the same as the interim boundary. The proposed final boundary is shown in Figure 1.

User Capacity

The Wild and Scenic Rivers Act requires that user capacities are identified for each designated river and addressed in the river's associated CRMP (Section 3 (d)(1)). Appropriate adaptive management strategies are then developed based on these capacities. User capacity is defined as the maximum number of visitors per day that can be supported by the river without causing degradation or adverse impacts on river values. To estimate user capacity, information on current amounts and types of use is reviewed. Use is typically measured in number of visitors per day, vehicles per day, campsite occupancy per day, or combinations thereof. User capacity is generally extrapolated from estimates of current use, types of use, and visitor behavior, although there is no single prescribed method for calculating capacity.
A user capacity analysis was conducted for Piru Creek Wild and Scenic River and is included as Appendix B to the CRMP. Goals of this analysis included identifying current usage at the river, determining the kinds of uses the river can support without impacting river values, establishing thresholds of use to prevent degradation of river values, calculating the user capacity, identifying triggers for management action, and establishing adaptive management actions when triggers are exceeded. These adaptive management actions are thus incorporated as part of this project's Proposed Action. User capacity is addressed for both the recreational (3 miles) and wild segments (4.25 miles).

In the user capacity analysis, the project area was divided into three analysis areas. User capacity was estimated separately for these areas because of the variation in types and amount of use in each area.

Potential Future Management Actions

In addition to the adaptive management actions in response to changes in use levels described above, the CRMP provides further management direction to meet the requirements of the Wild and Scenic Rivers Act. Several additional potential future management actions are described below that would protect and enhance the river's free-flowing condition, water quality, and ORVs. These management actions are guided by a set of desired conditions for the river, described in further detail in the CRMP.

Although the CRMP and this EA discuss potential management actions to protect and enhance river values, they do not represent commitments or proposals to take the actions described. Site-specific actions detailed in these documents would require separate NEPA analysis as well as other appropriate compliance prior to implementation. The Proposed Action of this EA is solely the adoption of the CRMP, not the implementation of any actions described. The potential future site-specific management actions proposed in the CRMP are described in further detail below:

- Designate Piru Creek as a priority watershed under the Watershed Condition Framework (WCF)[4] to enhance funding opportunities to improve riparian conditions, fish and wildlife habitat and water quality, including eliminating or reducing sediment sources.
- Plan and implement treatments to control and reduce spread of invasive plant and animal species, including non-native, invasive tamarisk, and monitor and take immediate action to eradicate any invasive aquatic species.
- Assess Proper Functioning Condition of riparian area every five years using baseline developed in User Capacity Study.
- Coordinate, develop, and implement a sign plan with partner agencies; elements to include WSR identification, ORV interpretation, and updating and simplifying the Frenchman's Flat signage including regarding relevant regulations, such as fishing, and the need to minimize microtrash to protect Condors.
- Evaluate potential for large scale stream/floodplain restoration at meander cut off downstream to pond. Review past feasibility studies and work with agency partners to identify options for restoring hydrologic and wetland function at the Piru Ponds.
- Support National Marine Fisheries Service (NOAA) and United Water in reintegrating Pacific Steelhead to Piru Creek above Santa Felicia Dam; coordinate with California Department of Fish & Wildlife in achieving desired conditions for fisheries.

In addition to the management actions listed above, the free-flowing condition, water quality, and certain ORVs of the river would be monitored upon adoption of the CRMP. Several potential monitoring items are suggested in the CRMP to address the areas of highest concern in the river corridor. These items include free flow, water quality, fish, and geology. These are discussed in further detail, along with proposed monitoring actions, in Table 2. River values for which there is no specific monitoring item are already adequately monitored under existing Forest management, which would continue upon adoption of the CRMP. Additional monitoring items specific to user capacity can be found in Appendix B of the CRMP.

Table 2. Potential Monitoring Items within the River Corridor

Location of Monitoring Action	Potential Issue / River Value Addressed	Monitoring Action
Throughout the WSR corridor	Free flow, Fisheries	Continue to monitor for user-created dams that may impede free flow
Throughout the WSR corridor	Fisheries	Continue and/or enhance monitoring for aquatic invasive species (plants and animals)
Campsites and dispersed camping areas	Water Quality	Continue to monitor for overnight camping within 100 feet of the WSR; continue to monitor compliance with seasonal fire restrictions.

[4] https://www.fs.usda.gov/restoration/Watershed_Restoration/guidance.shtml

Location of Monitoring Action	Potential Issue / River Value Addressed	Monitoring Action
Throughout the corridor	Water quality	Monitor for sediment sources and impacts to riparian areas
Frenchman's Flat Day Use Area	Water quality	Continue monitoring for cottonwoods on outer riparian
Throughout the corridor	Water quality and free flow	Conduct surveys of surface water and groundwater to monitor for free flow, recreation use, and riparian health.
Recreational segment	Geology	Maintain in the WSR casefile a record of all requests to collect or remove rocks, review by a professional geologist, and any approvals

CHAPTER 3. AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This section summarizes the affected environment, the potential changes and impacts due to implementation of an alternative, and the basis for comparison of alternatives. Resources determined by the interdisciplinary team to be potentially affected are identified and analyzed. These include the ORVs relevant to each river segment, as well as global resource values, such as hydrology.

Resources determined to be potentially affected by the No-Action and Proposed Action alternatives are hydrology, geology, scenery, fish, and recreation.

GENERAL METHODOLOGY FOR ANALYZING IMPACTS

In accordance with the Council on Environmental Quality (CEQ) regulations for implementation of NEPA, direct, indirect, and cumulative impacts are described under each impact topic (40 CFR 1502.16 and 40 CFR 1508.1). To determine impacts, the current condition of each resource analyzed is presented below, followed by a comparison between the alternatives described in Chapter 2.

Direct impacts are caused by the action and occur at the same time and place. Indirect impacts are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable.

Cumulative impacts are defined as “the effects on the environment which results from the incremental effects of the action when added to the effects of other past, present, or reasonably foreseeable actions regardless of what agency (federal or nonfederal) or person undertakes such other actions” (40 CFR 1508.1). Cumulative impacts were determined for each impact topic by combining the impacts of the alternative being analyzed and other past, present, and reasonably foreseeable future actions that would also result in beneficial or adverse impacts.

Also considered in the impacts analysis is the User Capacity Analysis (Appendix B of the CRMP), which establishes user capacity thresholds and triggers and contains adaptive management strategies to manage use within those capacities.

CUMULATIVE ACTIONS

Past projects or plans with ongoing effects and reasonably foreseeable future projects and plans were identified by an interdisciplinary team to provide the cumulative impacts scenario. The cumulative impacts analysis focuses on cumulative actions that overlap with the project area or that are close enough that impacts from those areas may have been observed within the project area and on the resources (ORVs) carried forward for detailed analysis.

- **Legacy effects of old roads in the WSR corridor** – as part of the Forest Service's Legacy Roads and Trails Remediation Program, the Angeles National Forest intends to decommission and rehabilitate Forest Service Road 6N30 (Cherry Canyon Road), which runs through the WSR corridor. Work would likely include winterizing and storm proofing the former road, which may involve the following actions: hydrologically closing the road, including culvert removal in perennial and intermittent streams; removing, installing or upgrading cross-drainage culverts; upgrading culverts on non-fish-bearing streams; constructing water bars and dips; reshaping road prisms; vegetating fill and cut slopes; removing and stabilizing of side-cast materials; grading or resurfacing roads that have been improved for aquatic restoration with gravel, bark chips, or other permeable materials; contour shaping of the road or trail base; removing road fill to native soils; and soil stabilization and tilling compacted surfaces to reestablish native vegetation.

- **Frenchman's Flat Recreation Site Improvements** – the Forest Service intends to undertake, as part of its agreement with DWR and in coordination with the FERC relicensing process, construction of improvements and enhancements at some existing sites on the Forests, including the Frenchman's Flat recreation site within the WSR corridor. Improvements may include installing stairs to facilitate visitors climbing from the nearby road to the stream; new toilets; replacing amenities such as shade structures and picnic benches; and kiosks and garbage cans. Any hardened surfaces added to the site would be limited and only where needed, such as gravel near the restroom areas. Improvements would adhere to the Forest Service's 2024 *Sustainable Recreation Site Design Guide*, which helps field staff with planning and designs for new construction and for reconstruction of existing recreation facilities and sites, while considering social, environmental, and economic sustainability.

HYDROLOGY

Affected Environment

Free Flow

Section 16b of the Wild and Scenic Rivers Act defines "free flowing" rivers as any river or section of river existing or flowing in natural condition without impoundment, diversion, straightening, rip rapping, or other modification of the waterway. There are no impoundments within the designated segments of Piru Creek, thus the river is considered free flowing. Pyramid Dam impounds Piru Creek directly upstream of the designated segment. Pyramid Dam was constructed by the California Department of Water Resources in the 1960s and completed in 1973 as part of the State Water Project and has a storage capacity of 161,375 acre-feet of water. California Department of Water Resources controls releases from Pyramid Lake under a FERC license. These releases control the downstream flow of Piru Creek. The license Article 52, as amended in 2009 after a temporary waiver in 2005, requires the licensees to match outflows from Pyramid Lake to natural inflows to Pyramid Lake, to the extent feasible for operations and safety. This flow regime is to avoid impacts to the federally endangered arroyo toad (*Anaxyrus californicus*). The license allows for limited exceptions for emergency flood protection and other testing,

and delivery of water to United Water Conservation District Lake Piru in the winter months (November to February) when flows would not interfere with arroyo toad reproduction.

A review of the streamflow data (October 1988 to September 2023) from USGS Stream Gauge 11109525 – Piru Creek below Pyramid Lake near Gorman, CA shows fluctuations in discharge from a monthly mean high value of 780 cubic feet per second (cfs) recorded in February 1998 to a low of 1.8 cfs recorded in July 2018. Mean daily flow for the entire period of streamflow data is 48.2 cfs, with a peak daily mean value of 6000 cfs, recorded on February 23, 1998, and two low values of 0.0 recorded on September 4 and 5, 2012. Mean daily flow is greatly affected by season, with the wetter winter season (December through April) having a substantially higher frequency of high flow events than the drier summer months. Review of the same streamflow data shows that mean daily flow rates never exceed 200 cfs in the months of May through November, whereas flows exceeding 1000 cfs are almost exclusive to the months of January through March.

Summer discharge averaged 26 cfs for the month of July for the period of 1989 to 2006. Summer discharge averaged 4.8 cfs for the month of July for the period of 2007 to 2023. In approving the Article 52 operating guidelines in 2009, FERC recognized that the unnatural supplemental summer releases were not protective of arroyo toads. The intent of the modifications to Article 52 is to have operational releases reflect the natural hydrograph for protection of downstream resources and thus the current average summer discharge is lower than the values recorded from 1989 to 2006. Summer streamflow is augmented upwards of 0.8 cfs above the dam discharges in the recreation river segment from streamflow from tributaries into Piru Creek into the wild river segment.

A portion of the Golden State Highway was built through the recreation segment between 1929 and 1933 to provide a safer three lane road through the Tejon Pass to Gorman, California. Construction of this road bisected and straightened portions of the stream in a meander cutoff as evidenced in the 2018 NAIP imagery. As a result of the meander cutoff, the channel near a second, nonfunctiong USGS stream gauge control (#11109550) is over steepened, and the channel and flow patterns are in adjustment as a result. Evidence of this adjustment includes a scour pool below the gauge, which includes a damaged concrete weir within the streambed, and an area of sediment deposition in the channel downstream of the weir. The sediment deposition has led to the stream migrating to one side of the valley and undercutting the adjacent hillslope (see Figure 2). In Figure 2, note the scour pool below the gauge and the area of deposition that forces the stream against a potentially unstable slope.

Portions of the Golden State Highway north of this river segment are submerged under Pyramid Lake. The FERC license for Pyramid Dam includes access adits to the Angeles tunnel that is part of the hydroelectric infrastructure, as well as a paved road across Piru Creek to access these adits. The access road to the adits cross Piru Creek with a concrete ford that has led to pool formation and sediment deposition upstream of the crossing.

The nonfunctioning USGS gauge, the Golden State Highway, the FERC-licensed access road, and small rock dams occasionally created by visitors each has potential to limit the free flow of Piru Creek. Management actions to ensure that the free flow of Piru Creek is maintained are proposed in the CRMP.

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

Piru Creek Comprehensive River Management Plan

Figure 2

Piru Creek at Meander Cutoff and Stream Gauge Weir Vicinity

Water Quality

According to the California State Water Resources Control Board (CWRCB), the designated beneficial uses of water for the recreational and wild segments of Piru Creek are agricultural supply, cold freshwater habitat, municipal and domestic supply, non-contact water recreation, spawning, reproduction, and/or early development, warm freshwater habitat, and water contact recreation.

Stream temperatures are lower in the recreation section. Solar radiation in this segment is relatively high, providing a cooling effect to visitors from evapotranspiration of the cold waters discharged from Pyramid Lake. Solar radiation in the wild segment is relatively lower, reducing evapotranspiration rates and maintaining cooler surface stream temperatures, which are beneficial to the local fish and wildlife species. Stream temperature is kept lower by a mostly intact and robust riparian forest in the recreation and wild sections of the stream.

The wild segment is composed of a natural landscape with steep gradients, including slopes over 100 percent. The only major disturbances in modern times were caused by the 1928 Didge Fire #96 and the 2006 Day Fire. These two wildfire events would have accelerated erosion of up to three to five years based on soil burn severity. Erosion rates would typically trend back to normal ranges after five years. Natural background erosion rates in the recreation and wild segments from observation appear to be relatively high.

The wild and recreational river segments are listed in the 2018 Water Quality Integrated Report (CWRCB 2018) as an impaired waterbody (Class 5) with a Total Maximum Daily Load (TMDL) needed for chloride, pH, and toxicity. The California Water Quality Board for the Los Angeles Region is responsible for TMDL development. A TMDL analysis was undertaken for both chloride and pH that was due to be completed in 2019 but is not available at the time of this report. A TMDL analysis for toxicity is scheduled to be completed in 2027.

The Watershed Condition Class (WCC) rating for the Fish Creek-Piru Creek HUC12 watershed is listed as functioning at risk with both the water quality and water quantity metrics rated as poor. The water quantity metric is listed as poor due to the artificial impoundments of natural streamflow from Pyramid Lake. Sediment is being eroded from roads, unauthorized campsites, the Frenchman Flat area, areas of instability in the channel, and disturbed and undisturbed steep areas in the watershed and is reaching Piru Creek and its tributaries, causing elevation of sedimentation in the stream. Unstable stream banks resulting from visitor use or in-stream infrastructure occur in some areas and contribute to erosion. Sedimentation adversely alters stream ecology and water quality and is considered a water pollutant.

Channel and Riparian Conditions

Riparian systems represent the interface between aquatic and terrestrial systems. When functioning, they enhance water quality, attenuate floods, provide continuous large wood to stream systems, stream shade and reduce erosion and sediment transport. Riparian areas generally consist of intermittent or perennial streams, ponds, lakes, wetlands and adjacent lands with soils, vegetation, and landform indicative of high soil moisture or frequent flooding.

A representative portion of riparian areas found within the Piru Creek Wild and Scenic River corridor, Angeles and Los Padres National Forests were evaluated in 2023 using the lotic (free flowing) Proper Functioning Condition (PFC) protocols (BLM 2015) to determine both riparian potential and functionality. Resource values along this section of Piru Creek include fish habitat, recreational opportunities, water quality, and free flow.

Potential natural condition encompasses hydrologic, vegetative, and stream channel attributes; therefore, potential natural condition accounts for the hydrologic regime, the plant communities, and the channel and floodplain characteristics of the riparian area that exist at potential.

Stream reaches or springs receiving a rating of *Proper Functioning Condition (PFC)* are in satisfactory condition. Reaches receiving either a *Functional at Risk* or *Nonfunctional* rating are in unsatisfactory condition.

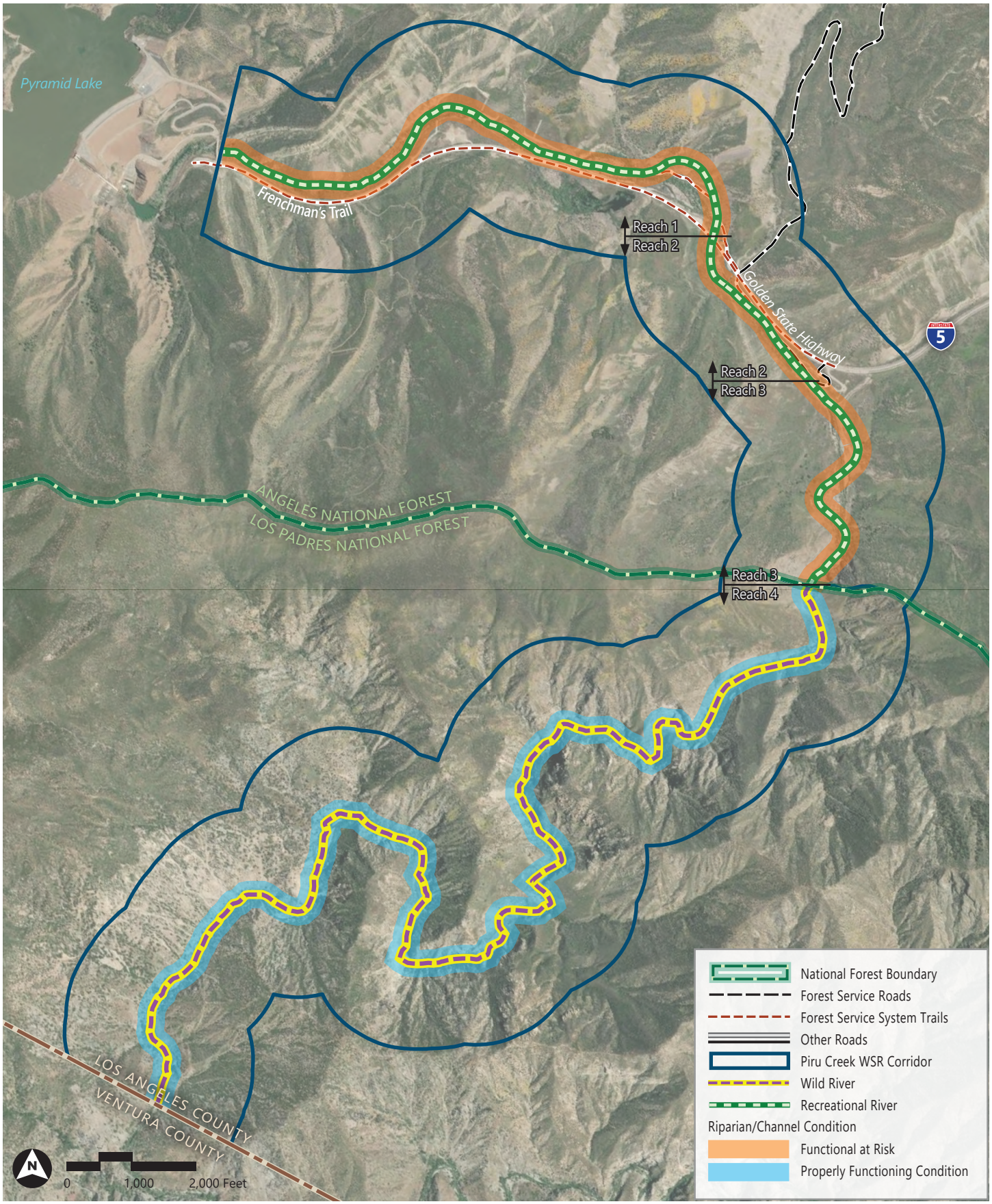
Three individual lotic PFC reaches were physically surveyed during July 2023. Reach four through the wild section was not physically surveyed but was estimated to be properly functioning. Reach names, lengths, and PFC survey condition are shown in Table 3 and a map displays the reaches in Figure 3.

Table 3. Properly Functioning Condition Survey Results for Riparian Areas Along Piru Creek

Riparian Area Name	Length of Survey (miles)	Riparian/Channel Condition*	Trend
Piru Creek Stream Reach 1 along recreation section from bridge near Pyramid Dam to highway bridge	2	Functional at Risk	No trend apparent- static
Piru Creek Stream Reach 2 recreation section highway bridge to Osito Canyon	1	Functional at Risk	No trend apparent- static
Piru Creek Stream Reach 3 recreation section from Osito Canyon to beginning of Wild Section	0.5	Functional at Risk	No trend apparent
Piru Creek Stream Reach 4 Wild Section	4	Properly Functioning Condition	Not applicable

* *PFC = Proper Functioning Condition, FAR = Functioning at Risk*

Of the 3 physically surveyed riparian areas in the recreation segment of Piru Creek, we determined that all field surveyed reaches were functioning at risk. Reach 4 through the wild section was not physically surveyed but was estimated to be properly functioning. The riparian area vegetation community for all sections is near potential with vigorous growth, diverse species and age classes. Piru flows through a steep sided alluvial valley with the stream slightly entrenched to no entrenchment, low sinuosity and moderate width to depth. Gravel composes the bed and banks.



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Piru Creek Comprehensive River Management Plan

Figure 3

PFC Survey Results for Riparian Areas Along Piru Creek

Reach 1 is in functional at risk condition. The stream is functioning with well-established and vigorous riparian vegetation. The riparian area could possibly be expanded through a change to a more complete flow regime- which would be a flow that fully mimics a natural hydrograph, complete with low flow periods and natural patterns of flooding. Flow releases from the dam, however, prevent a completely natural flow regime where flood dynamics could recruit certain riparian species; to that extent, the dam may prevent the system from reaching PFC. For instance, overbank streamflows with a slowly declining recession in flow can lead to recruitment of cottonwoods on floodplains (Lytle and Merrit 2004). Streamflow migration can lead to establishment of riparian tree species like cottonwood out on abandoned floodplains some distance from the channel. This same concern also applies to reaches 2 and 3. For reach 1, other impacts to flow such as weirs or channel straightening impediments to flow could be removed or altered to reduce effects to the channel. Potential flow restoration is addressed in the CRMP.

Impacts of No-Action Alternative

Under the No-Action Alternative, existing federal guidelines, such as those in the Forest Plan and Section 7 of the Act, as well as state water quality standards, would continue to protect the ORVs, water quality, and streamflows in Piru Creek.

Under the No-Action Alternative, there would continue to be adverse impacts as a result of channel adjustments in certain areas such as the nonfunctioning stream gauge weir or the meander cutoff. Flows would be managed to protect Piru Creek from the potential harmful effects of water resources projects. Some roads or recreation sites in the WSR corridor would not be rehabilitated and could continue to contribute flows and sediment to the stream. Sedimentation from human-caused activities would continue to degrade stream productivity, stream channel, and riparian conditions. Under the No-Action Alternative, FS would continue full participation in FERC relicensing for Pyramid Dam, in order to implement Federal Power Act conditions for resource protection. This would lead to maintaining ecologically sustainable options for flow maintenance and improvements in the WSR corridor.

Impacts of Proposed Action

Under the Proposed Action, impacts would be the same as under existing law, regulation, policy, Executive Orders, and special area plans (as applicable), but would add additional protection for hydrology resources, such as a final boundary, user capacity thresholds, and adaptive management actions triggered by these thresholds. Identifying an appropriate carrying capacity for visitor use, and watershed wide rehabilitation of disturbed areas proposed in the project would help to reduce visitor impacts on water quality.

Establishing a final boundary would result in a beneficial impact because it would allow for management and protection of the river corridor from activities that may lead to sedimentation, or free flow or water quality impairments.

The Proposed Action includes efforts to reduce non-natural sources of sedimentation in the corridor, such as developing a watershed road management plan, reducing sediment coming off the Golden State Highway into Osito Canyon, evaluating sediment source areas (including infrastructure-related sediment from the Frenchman’s Flat area), and potential rehabilitation of user created campsites. Rehabilitation efforts to reduce non-natural sources of sedimentation would improve water quality and riparian and

stream channel conditions in the corridor. Over time these efforts would lead to improved water quality in the recreation and wild segments of the WSR corridor. Forest Service Best Management Practices would be applied for all activities to ensure compliance with the Clean Water Act. This includes following direction in the Forest Plan, and USDA National Best Management Practices for Water Quality Management on National Forest System Lands (USDA Forest Service 2012a) and other design features specified for this project. Applicable national BMPs include AqEco 1-3, and Rec 1-3.

Adherence to Forest Plan standards and guidelines as well as Forest Service best management practices would ensure that all federal, state, and local laws pertaining to hydrology-related resources would be met.

Riparian improvements would likely occur under the Proposed Action. Efforts would be made to consider replacing and/or managing for decadent cottonwoods on the outer riparian area along the WSR corridor. This would include a planting plan to provide shade and habitat in the outer riparian zone and to improve user experience. Hydrology improvements would focus on the Frenchman's Flat recreation site to enhance water quality and resource sustainability, keeping recreational impacts concentrated in portions of the recreational segment of Piru Creek. These efforts would lead to decreased sedimentation and help maintain lower stream temperatures in warmer times of the year.

Cumulative Impacts

Past, present, and reasonably foreseeable effects along the stream and in the watershed are numerous. Past watershed effects include legacy effects from previous road building in the WSR corridor, road management, stream geomorphology adjustments to disturbance or flow changes and floods, sediment erosion from land disturbance, sediment erosion from cleared areas and roads, and associated runoff. Reasonably foreseeable actions related to watershed health include the decommissioning and stabilization of Forest Service System Road 6N30 (Cherry Canyon Road).

The effects of these activities would generally have a positive impact on the Piru watersheds because they reduce human caused sedimentation and other impacts and would take time to develop. Reducing sediment sources would be a general theme for this work. Increased sediment from human caused activities can reduce productivity of waterways, cause stream channel instability, degrade riparian areas, and can destroy infrastructure.

The effects of managing the flows of Piru Creek to mimic a natural hydrograph have led to favorable channel and riparian areas that likely resemble pre-disturbance conditions with abundant riparian vegetation and stable stream conditions in many areas. The past and present effects of watershed roads and past construction of weirs and road crossings in Piru Creek have led to local channel instability and channel adjustment. Roads in the watershed such as the Cherry Creek Road and slopes along Osito Creek alongside the Golden State Highway are actively eroding and need to be rehabilitated because of sedimentation risks. Sediment from these areas can reach Piru Creek and impact water quality or cause changes in channel conditions.

The effects to channel conditions and water quality from past, present, and reasonably foreseeable human caused disturbances in the watershed is difficult to quantify. The watershed condition class rating lists water quantity impairment as an indicator of poor watershed health. The same ranking lists water quality

as poor in Piru Creek. Assessing geomorphic and riparian conditions has shown that management has led to conditions that are improving (see Appendix A of this EA). Efforts to mimic natural hydrographs have led to successfully managing vegetation recruitment of desirable plant species in the stream corridor. As a result, effective riparian management will ultimately lead to more stable stream geomorphic conditions. While there are impacts in the recreational and wild segments of the corridor that are beyond the control of FS, planned improvements at Frenchman's Flat Day Use Area will generally be a beneficial effect on hydrology and channels. There may also be other options to improve these in the future.

Combined with the overall beneficial impact of the Proposed Action, these reasonably foreseeable actions would contribute a beneficial increment, resulting in an overall beneficial impact on hydrology in the WSR corridor. Under the No-Action Alternative, which would contribute an adverse increment to the cumulative scenario, the cumulative actions discussed above would still offer an overall positive impact on water quality and free flow in the WSR corridor.

GEOLOGY

Affected Environment

The east-west trending Transverse Ranges include California's highest peaks south of the central Sierra Nevada and the only Precambrian rocks in the coastal mountains of the United States. The Transverse Ranges are a unique geomorphic, stratigraphic, petrologic, and structural belt 400 kilometers long and 100 kilometers wide that is offset by a few tens of kilometers right laterally by the northwest trending San Andreas fault system. The prominent east-west trend of the Transverse Ranges is unique among the rest of the northwest-southeast trending coastal ranges in California. It has been proposed that they have rotated significantly from their original position. Along the entire mapped length of the San Andreas Fault Zone, from northern California to Mexico, no other such diverse belt of rocks, structure, and geomorphology similar to the Transverse Range Province crosses the zone. In addition, despite their comparatively small area, the Transverse Ranges incorporate a greater spectrum of rock types and structure than any other province in the state. The Transverse Ranges are likely the result of compressional forces along the Big Bend in the San Andreas Fault that itself is a unique geologic feature in North America if not the world.

Piru Creek, below Pyramid Reservoir, flows through scenic tilted layers of sedimentary rocks of the Ridge Basin Group, an inter-montane basin exposing the interrelationships of tectonics and sedimentation, and often the subject of geology field trips by academic and casual interest groups. The Ridge Basin is a prominent, northwest-southeast oriented basin between the San Gabriel Fault to the southwest and the San Andreas Fault to the northeast. The basin developed during a tectonically active period in the late Miocene to early Pliocene (11-5 Ma), during which about 14,000 meters of strata accumulated (Schwartz 2020), which is characterized by one of the world's highest sediment accumulation rates of about 2 meters /1000 years (Link 1982). The Ridge Basin is the best exposure basin along the San Andreas transform belt and affords an excellent opportunity to observe marine and non-marine facies in a wrench-fault setting.

Accumulated along and displaced by the San Gabriel Fault are coarse gneissic debris, sourced from the Alamo-Frazier Mountain region and known as the Miocene Violin Breccia. The Violin Breccia along with some other local geological units have been used to restore displacement on the San Gabriel fault and thereby construct the tectonic history of Ridge Basin (Schwartz 2020).

About 3.5 miles south of Pyramid Dam, Piru Creek turns back to the west and crosses the San Gabriel Fault zone into Precambrian gneiss (metamorphic) and Mesozoic to Precambrian granitic (igneous) and gneissic rocks.

Piru Creek winds its way through tight bends in a 1,500- to 2,000-foot-deep canyon, displaying active debris slides on canyon walls and deep pools and carved granitic boulders in its upper reaches.

The San Gabriel and other nearby faults are interpreted by Dr. John C. Crowell, Professor Emeritus of the University of California, as strands of the San Andreas Fault system within this splintery boundary region between two giant tectonic plates, the North American Plate to the northeast and the Pacific Plate to the west. Where the San Gabriel Fault crosses lower Piru Creek, it separates 4- to 5-million-year-old (young) terrestrial sedimentary rocks from +/- 600-million-year-old Precambrian metamorphosed gneiss, exposing a dramatic change in rock type and geomorphic form (Crowell 1952).

There is a close relationship between the geological/geomorphological values and the river. On one hand, the specific geological units along this proposed segment of Piru Creek are contributing directly to the spectacular geomorphic features (incised gorges and deep pools) of the creek. On the other hand, the fact that the river is flowing in its current path is contributing to the erosional processes (active debris slides) along the creek, along tribute drainages and along the steep slopes of the river itself. In addition, this incised creek has been deepening over millions of years, exposing furthermore the unique geological units along this river.

Public rockhounding and casual collecting does not regularly occur to any notable degree. Since designation there have been several requests and approvals to allow limited rock specimens to be removed for scientific and educational purposes such as carbon dating.

Within the recreational segment, the sedimentary rocks, just below Pyramid Lake are part of the Ridge Basin Group and display a sequence of terrestrial and marine sedimentary rocks, from the late Miocene through early Pliocene Epochs (Crowell 1954, 1982; Dibblee 1996). These sedimentary rocks are important to the study of the development of the Ridge Basin that coincided with movement on the San Gabriel Fault. These rocks provide critical information about the movement history of the unique Transverse Ranges.

The basement rocks that outcrop in the wild segment on the west side of the San Gabriel Fault are gneisses and migmatites that are banded and form scenic outcrops and boulders along and in the creek. Geologically these rocks are important because exposures of basement rocks provide important clues to this less well-understood portion of North America’s tectonic history.

The active San Gabriel Fault is one of several important structural features greatly influencing the geologic exposures and geomorphic landforms in southern California. The transition from young

sedimentary rocks (ridge-basin Group) to old basement rocks along with the clues each one of these rock types provides in the study and understanding of the San Gabriel and San Andreas faults are important geologic features within the corridor.

Impacts of No-Action Alternative

Under the No-Action Alternative, the CRMP would not be adopted. Existing law, regulation, policy, Executive Orders, and special area plans (as applicable) would therefore continue to guide management of this section of the river. Further, no user capacity would be implemented. Impacts to geology, while historically infrequent, can vary in scale and impact such as debris slides or wildfires. Impacts on a lesser scale but more frequently occurring include rock hounding, finer sediment erosion from recreational activities, and sediment and pollutant loading from vehicular traffic along the Golden State Highway. Impacts to the unique geologic features of the corridor and visitors' geologic experience are expected to continue to occur if the CRMP is not adopted.

Impacts of Proposed Action

Under the Proposed Action, impacts would be the same as existing law, regulation, policy, Executive Orders, and special area plans (as applicable), including that any proposed water resources projects would have to be reviewed under Section 7 of the Act; the Proposed Action would add additional protection for geology resources, such as a final boundary, user capacity thresholds, and adaptive management actions triggered by these thresholds. Implementing the management actions proposed in the CRMP, such as those authorizing the removal of surface rocks and minerals as well as those intended to reduce erosion along the corridor, would result in a beneficial impact because it would include additional protection of the river corridor and its geologic features from unauthorized activities, debris slides, and increased rockhounding or canyoneering, which may lead to impairments such as increases in ground disturbances resulting in sediment runoff, rock migration, flow diversions, or potential changes in the stream mesohabitats.

Cumulative Impacts

The CRMP describes specific management actions that could be implemented to protect and enhance the geology values and accessibility within the river corridor. Combined with the cumulative actions described above that aim to reduce erosion, there would be an overall beneficial impact on geology under the Proposed Action. Adopting the CRMP and thus the user capacity thresholds and adaptive management actions triggered by those thresholds would have a beneficial impact on geology values because they would afford additional protections due to less impact from unauthorized rock collection. Management actions specifically directed at geology are integral to the management and success of Piru Creek, its geomorphology and free flow condition, and all ORVs, as the geology provides the landform for which they are derived. Under the No-Action alternative, impacts to geology would continue to vary, though increased erosion would be likely which would contribute an adverse increment to the cumulative scenario. Combined with the beneficial increment of the road decommissioning and rehabilitation, the overall cumulative impact would still be adverse, because activities to improve Cherry Canyon Road and surrounding erosion would only occur in an isolated part of the corridor.

SCENERY

Affected Environment

The wild segment begins where the river enters the Sespe Wilderness. This segment lacks developed features or related sites and sounds, as the topography transitions abruptly from the wider valley of Frenchman's Flat to a narrow, steep canyon with 400-700 feet of elevation relief. Approximately 75 percent of the total wild river segment, and 41 percent of the total WSR corridor, are classified as "Distinctive," or scenic attractiveness class A, containing the highest combination of landform, water, rock, and vegetation. The presence of water in such relatively dry, steep topography does offer high scenic attractiveness, in the wild segment of Piru Creek. The rock formations along the canyon in the wild segment are rare and visually interesting due to a mix of color, textures, and landforms. The striking beauty of Piru Creek WSR's wild segment is well documented in blogs, guidebooks, social media, and user interviews.

Impacts of No-Action Alternative

Under the No-Action Alternative, the CRMP would not be adopted. Existing law, regulation, policy, Executive Orders, and special area plans (as applicable) would therefore continue to guide management of this section of the river. Further, no user capacity would be implemented. Impacts to scenery in the wild segment of the WSR would continue to be minimal even if the CRMP is not adopted. Therefore, the No-Action Alternative is not anticipated to impact scenic resources.

Impacts of Proposed Action

Under the Proposed Action, impacts would be the same as under existing law, regulation, policy, Executive Orders, and special area plans (as applicable). The Proposed Action involves adoption of the CRMP. This would provide further guidance on management of this segment of the river, as well as setting user capacity levels and implementing final river boundaries.

Adopting the CRMP and thus the user capacity thresholds and adaptive management actions triggered by those thresholds would have a beneficial impact on scenic values because they would afford additional protections if recreation use reached a level that eventually impacted scenery or the related sites and sounds that contribute to this ORV.

Cumulative Impacts

The cumulative actions described above are not proposed within the wild segment of the WSR corridor and therefore would not contribute a cumulative impact to the No-Action or Proposed Action impacts for scenery.

FISH

Affected Environment

Native fish species such as resident rainbow trout (*Oncorhynchus mykiss*) and arroyo chub (*Gila orcuttii*), as well as non-native prickly sculpin (*Cottus asper*), inhabit the designated segments of Piru Creek. A species of sucker has been documented in the wild section of Piru Creek as recently as 2018 (CDWR and LA DWP 2019). Authors of the study were not able to identify these fish to species. The arroyo chub, a Forest Service sensitive species, was introduced into Piru Creek and now is mostly extirpated from its native rivers in Southern California (Moyle 2002). Although resident rainbow trout in the designated segments of Piru Creek cannot reach the ocean due to a fish passage barrier at Santa Felicia Dam, they are greater than 99.9% genetically identical to the federally endangered ocean-going Southern California steelhead (*Oncorhynchus mykiss*) found below fish passage barriers within the Santa Clara watershed (Adabia Cardoso et al. 2016). For example, freshwater resident rainbow trout that have completed their life history cycle entirely in freshwater can produce anadromous progeny that emigrate to the ocean. Conversely, steelhead that migrate from the ocean may produce progeny which complete their entire life history cycle in freshwater (Boughton et al. 2006, Garza and Clemento 2007, Christie et al. 2011, NMFS 2012). The two forms can interbreed and contribute to the genetic pool of the population. Nearly half of the resident rainbow trout surveyed in Piru Creek have been found to contain the genetic marker for anadromy (Pearse et al. 2014).

Water releases from Pyramid to Lake Piru have significantly modified the natural dynamics of stream flow and sediment transport within the channel (see Free Flow section in ‘Hydrology” above), although the requirement that water releases match the natural inflow have restored some natural function. Several non-native species have also been introduced to Piru Creek, to the detriment of native species; the source of these introductions is not known. Non-native species present in Piru Creek include, but are not limited to, bullfrog (*Lithobates catesbeianus*), small and largemouth bass (*Micropterus dolomieu* and *Micropterus salmoide),* black bullhead catfish (*Ameiurus melas*), green sunfish (*Lepomis cyanellus*), bluegill (*Lepomis macrochirus*), and brown trout (*Salmo trutta*). The unnatural supplemental summer flows that were released prior to the 2005 amendment of FERC license Article 52 were required to maintain a trout fishery below the dam. Historically, those initial fluctuating stream releases were recommended by USFS and CDFW and were based on air temperatures and not based on the natural hydrograph of Piru Creek. The initial stream releases were incorporated into Exhibit S (19822) of FERC license P-2426 and were later amended in 1993 to provide constant summer flows at the recommendation of CDFW. In 2005, Pyramid Dam’s license requirements (Articles 51 and 52.26) to provide minimum flows for rainbow trout were waived to favor a more natural flow regime that would limit impacts to the federally endangered arroyo toad. In granting the waiver, FERC acknowledged that lower water conditions in the summer would negatively affect rainbow trout and “may eliminate the majority of trout occurring in middle Piru Creek between July and October” (FERC 2005). However, the modified flow regime was found to provide benefits by controlling non-native plant and animal species as well as avoid incidental take of the arroyo toad and the wild rainbow trout that have persisted in Piru Creek.

The fishery in the recreational segment of Piru Creek is heavily impacted by the presence of infrastructure including a nonfunctioning USGS stream gauging station and dilapidated concrete weir, roads, high recreational use, and a younger aged riparian vegetation since the Day Fire in 2006. The nonfunctioning

channel spanning weir at the gauging station impedes the free-flowing nature of the river and is likely a fish passage barrier during all flows. As described in the hydrology section and Figure 2, a portion of the Golden State Highway was built through the recreation segment between 1929 and 1933 to provide a safer three lane road through the Tejon Pass to Gorman, California. Construction of this road bisected and straightened portions of the stream in a meander cutoff. As a result of the meander cutoff, the quantity and quality of fish habitat has decreased commensurately.

Additionally, user-created dams can also be temporary fish passage barriers but likely only at low flows. In most cases, these types of dams are considered a partial barrier because they may only be a barrier to certain life stages, such as juveniles. There is little species diversity or quality of habitat, and although some recreational fishing opportunities persist for wild rainbow trout, angling success is low. A 2019 fish population study did not note any substantially changed conditions for fish habitat or populations since the time of wild and scenic river designation (CDWR and LA DWP 2019).

The wild segment of Piru Creek exhibits natural fish habitat, with virtually no infrastructure. The segment contains a variety of mesohabitats typical of lower gradient streams, including deep pools, runs, glides, and low gradient riffles. The steep and narrow canyon walls provide shade, buffering the effects of warm temperatures and low water in the summer months. The wild segment, however, is still influenced by the presence of dams above and below, as well as multiple non-native species that prey on or are otherwise known to be harmful to native fish stocks. The state manages and is responsible for enforcing state fishing regulations protecting Southern California steelhead.

A representative portion of riparian areas found within the WSR corridor were evaluated in 2023 using the lotic (free flowing) PFC protocols (BLM 2015) to determine both riparian potential and functionality. Resource values along this section of Piru Creek include fish habitat, recreational opportunities, water quality, free flow in the stream, Endangered Species Act requirements, and USFS special status species. Of the three physically surveyed riparian areas in the recreation segment of Piru Creek, we determined that all field surveyed reaches were functioning at risk. Reach four through the wild section was not physically surveyed but was estimated to be properly functioning. The hydrology section of this EA includes a more detailed summary of surveyed reaches and assessment findings.

Impacts of No-Action Alternative

Under the No-Action Alternative, continuation of current management of Piru Creek would occur, the CRMP would not be adopted, and management would not comply with the Wild and Scenic Rivers Act. Interim management such as capacity control would continue as needed but would not be guided by plan direction specific to the Piru Creek area.

Existing management direction would continue to provide protection for native species. For Forest Service Region 5 Special Status Species, existing Forest policy 2670.32 would continue to direct management, which currently aims to avoid or minimize impacts to these species whose viability has been identified as a concern.

However, legacy impacts to water quality and fish habitat as identified above would continue. Management actions identified to address those impacts such as decommissioning the nonfunctioning

stream gauge weir and restoring the meander cutoff would be less likely to occur. Roads and recreation sites in the WSR corridor may not be rehabilitated and would continue to contribute sediment to the stream. Ongoing recreation would continue to cause minor impacts to riparian areas and potentially water quality but effects would be minor. Sedimentation from human-caused activities would continue to degrade stream productivity, stream channel and riparian conditions and aquatic habitat. Long term, fish habitat would be slower to improve, and the ability to mitigate effects from climate change would be decreased.

Impacts of Proposed Action

Under the Proposed Action, impacts would be the same as under existing law, regulation, policy, and special area plans (as applicable), but would add additional protection for aquatic resources, such as establishing a final WSR boundary, user capacity thresholds, potential recreation site improvements, reducing sources of sedimentation and adaptive management actions triggered by these thresholds. Establishing a final boundary would result in a beneficial impact because it would allow for management and protection of the river corridor from activities that may lead to sedimentation or water quality impairments or degradation of aquatic species habitats.

The CRMP lays out desired conditions and management approaches for Piru Creek Wild and Scenic River values and other resources and uses occurring in the area. This management direction is to ensure that the river's ORVs, including fisheries habitat and populations, are protected or enhanced. No direct or indirect effects to fisheries would occur as there are no ground disturbing management actions proposed at this time. When management actions are proposed, effects would be analyzed. Nonetheless, fisheries would benefit in the long term from the adoption and implementation of the plan as it would guide in the decision of future management, specifically management that minimizes impacts in recreational section.

Protection of free-flowing condition and water quality would protect and enhance aquatic habitat and species. These species generally require clean, cold, and well-oxygenated water for basic life history requirements, such as spawning, rearing, or maintenance of food base. In summary, the guidance specific to water quality has the ability to provide a long-term benefit to regionally important populations and special status species. As a result, CRMP guidance would result in the protection and future enhancement of the diversity of species, as well as ensure diverse and contiguous habitat. Efforts would be made to consider replacing and/or managing for decadent cottonwoods on outer riparian areas along the WSR corridor. This would include a planting plan to provide shade and habitat in the outer riparian zone and to improve user experience. The plan allows for future management such as watershed restoration actions (reduction in sediment from road networks, non-native invasive plant treatments or and riparian plantings).

The Proposed Action also identifies appropriate kinds and levels of visitor use that would protect ORVs. Pertinent triggers, thresholds, and management actions are identified in cases where outstandingly remarkable values may be impacted by visitor use. Visitor use has the potential to cause erosion, sedimentation and damage to riparian plant communities. These processes can degrade water quality and aquatic habitats. Over time, establishing capacity thresholds might afford additional protections due to less impact from recreational use. In the recreation segment, recreation use is high, especially around Frenchman's Flat Day Use Area.

Currently, very limited recreational activities are pursued in the wild segment due to difficult access and steep terrain. If recreation were to increase, the identified user capacity would protect and enhance fisheries and the whole ecological system's ORVs by limiting disturbance in riparian areas.
As mentioned above, the Proposed Action identifies management actions that are designed to improve water quality and fish habitat in the WSR corridor. Actions include the potential to implement large scale projects such as addressing the meander cut off and decommissioning of the nonfunctioning stream gauging weir. Other actions include developing a road management plan, evaluating opportunities to reduce non-natural sources of sediment coming off the Golden State Highway into Osito Canyon, addressing infrastructure-related sediment from the Frenchman's Flat area and potential rehabilitation of user created campsites. Rehabilitation efforts to reduce non-natural sources of sedimentation would improve water quality and riparian and fish habitat in the corridor. Forest Service Best Management Practices would be applied for all activities to ensure compliance with the Clean Water Act (USDA Forest Service 2012a) and other design features specified for this project.

Cumulative Impacts

The cumulative effects analysis area includes the 6th field drainage (HUC 12 – Fish Creek-Piru Creek – 180701020602) encompassing the project area. Present, ongoing and reasonably foreseeable projects or actions that may contribute to cumulative effects include activities on both federal and non-federal land. Reasonably foreseeable projects with the potential to affect fish include Frenchman's Flat Recreation Site Improvements, as well as planned decommissioning and rehabilitation of Cherry Canyon Road (6N30). Cumulative effects from these actions are considered to be adverse but minor in the short-term and beneficial in the long-term. Recreation driven impacts would be substantially reduced when the Frenchman's Flat project is complete. That project includes limiting and concentrating recreational access to "hardened" areas, e.g., rock steps, rehabilitation of impacted areas, potentially adding an additional toilet, and riparian planting. Recreation site improvements would focus on Frenchman's Flat and would enhance water quality and resource sustainability, keeping recreational impacts concentrated in portions of the recreational segment of Piru Creek. These efforts would lead to decreased sedimentation and help maintain lower stream temperatures in warmer times of the year ultimately benefiting the fisheries ORV.

Combined with the minor adverse impacts of the No-Action Alternative in which degradation may continue and improvements to fish habitat would be slower, the overall cumulative impact from past, present, and reasonably foreseeable projects would be beneficial due to the enhanced water quality, concentration of recreation impacts, and decreased sedimentation. Under the Proposed Action, the overall cumulative impact would be beneficial due to the benefits that would occur as a result of the management actions proposed.

WILDLIFE

Affected Environment

The recreational and wild segments of Piru Creek contain designated critical habitat for the California condor (*Gymnogyps californianus*) with multiple active roosting and perching sites along the wild section of the river corridor, verified with telemetry data between 2022 and 2024. Additionally, habitat along the

river corridor has the potential to support nesting pairs with suitable habitat demonstrating steep canyon walls, ridgelines, rocky outcrops, and access to water.

In 2011 the US Fish and Wildlife Service (USFWS) published a Final Critical Habitat Designation Rule for the arroyo toad in the Federal Register. This listing noted that the change in water releases from Pyramid Dam have likely benefitted arroyo toad habitat throughout Piru Creek, but the arroyo toad occupied and designated critical habitats do not occur within Piru Creek WSR. Currently, occupied and designated critical habitats are located approximately 0.5 miles downstream of the Piru Creek WSR (76 FR 7246). However, due to potential increase of suitable habitat from water releases from Pyramid Dam, the Piru Creek WSR could provide essential habitat linkages between known occupied areas and assist in the survival and expansion of the species.

Critical habitat was designated for the southwestern willow flycatcher (*Empidonax trailii extimus*) in 2013. There are 70 acres of critical habitat within Piru Creek Wild and Scenic River. The final critical habitat designation included 208,973 total acres, 38,564 of which are in the region of comparison, the Southern California Mountain and Valley Ecological Section. This designated critical habitat provides important linkages to habitats throughout the nation and region. The southwestern willow flycatcher breeds in dense vegetation along rivers, streams, or other wetlands, which are found throughout the species designated critical habitat in the Piru Creek corridor (FWS 2012). No recent surveys have been conducted along the Piru Creek corridor to establish occupancy within the designated critical habitat. Throughout the Piru Creek corridor, there is riparian vegetation that provides habitat for riparian-reliant species, such as the Federally Endangered least Bell's vireo (*Vireo bellii pusillus*). These riparian zones can provide essential foraging and stop over locations during migration. However, there is no designated critical habitat and are no known nesting or roosting least Bell's vireo within the Piru Creek WSR.

The southwestern pond turtle (*Actinemys marmorata pallida*), a federally proposed species is known to occur within the recreational section of Piru Creek. Currently, due to the proposed status of this species, no critical habitat has been designated yet and no surveys have been conducted to determine occupancy throughout the forests. However, presence of this species within the Piru Creek WSR corridor demonstrates that suitable habitat is present.

The wild segment of Piru Creek is relatively narrow with steep canyon walls bordering either side of the creek. This narrow riparian habitat corridor consists mostly of scattered stands of valley oak and sycamore with thickets of arroyo willow (*Salix lasiolepis*) and mulefat (*Baccharis salicifolia*) bordering the stream margins. The two-striped garter snake (*Thamnophis hamondii*), a Forest Service sensitive species, is also known to occupy Piru Creek WSR.

The federally endangered California red-legged frog (*Rana aurora draytonji)* occurs downstream (approximately 0.2 miles) of and not within the designated portion of Piru Creek (CDWR, 2019b).

Impacts of No-Action Alternative

Under the No-Action Alternative, continuation of current management of Piru Creek would occur, the CRMP would not be adopted, and management would not comply with the Wild and Scenic Rivers Act.

Interim management such as capacity control would continue as needed but would not be guided by plan direction specific to the Piru Creek area.

Existing management direction would continue to provide protection for wildlife species. For Forest Service Region 5 Special Status Species, existing policy in Forest Service Manual 2670.32 would continue to direct management, which currently aims to avoid or minimize impacts to these species whose viability has been identified as a concern.

Ongoing recreation would continue to cause impacts to riparian areas and potentially water quality; the effects are expected to be minor. The detailed field surveys conducted for the Capacity Analysis confirmed that use is concentrated around Frenchman's Flat and has lesser impact further from that site. Sedimentation from human-caused activities would continue to degrade stream productivity, stream channel and riparian conditions and aquatic habitat. Long term, wildlife habitat would be slower to improve, and the ability to mitigate effects from climate change would be decreased.

Impacts of Proposed Action

Under the Proposed Action, impacts would be the same as under existing law, regulation, policy, and special area plans (as applicable), but would add additional protection for aquatic resources, such as establishing a final WSR boundary, user capacity thresholds, potential recreation site improvements, reducing sources of sedimentation, and adaptive management actions triggered by these thresholds. Establishing a final boundary would result in a beneficial impact because it would allow for management and protection of the river corridor from activities that may lead to sedimentation or water quality impairments or degradation of aquatic species habitats.

The CRMP lays out desired conditions and management approaches for Piru Creek Wild and Scenic River values and other resources and uses occurring in the area. This management direction is to ensure that the river's ORVs, including wildlife habitat and populations, are protected or enhanced. No direct or indirect effects to wildlife would occur as there are no ground disturbing management actions proposed at this time. When management actions are proposed, effects would be analyzed. Nonetheless, wildlife would benefit in the long term from the adoption and implementation of the plan as it would guide in the decision of future management, specifically management that minimizes impacts in recreational section.

Protection of free-flowing condition and water quality would protect and enhance aquatic habitat and species. These species generally require clean, cold, and well-oxygenated water for basic life history requirements, such as spawning, rearing, or maintenance of food base. In summary, the guidance specific to water quality has the ability to provide a long-term benefit to regionally important populations and special status species. As a result, CRMP guidance would result in the protection and future enhancement of the diversity of species, as well as ensure diverse and contiguous habitat. Efforts would be made to consider replacing and/or managing for decadent cottonwoods on outer riparian areas along the WSR corridor. This would include a planting plan to provide shade and habitat in the outer riparian zone and to improve user experience. The plan allows for future management such as watershed restoration actions (reduction in sediment from road networks, non-native invasive plant treatments or and riparian plantings).

The Proposed Action also identifies appropriate kinds and levels of visitor use that would protect ORVs. Pertinent triggers, thresholds, and management actions are identified in cases where outstandingly remarkable values may be impacted by visitor use. Visitor use has the potential to cause erosion, sedimentation and damage to riparian plant communities. These processes can degrade water quality and aquatic habitats. Over time, establishing capacity thresholds might afford additional protections due to less impact from recreational use. In the recreation segment, recreation use is high, especially around Frenchman's Flat Day Use Area.

Currently, limited recreational activities are pursued in the wild segment due to difficult access and steep terrain. If recreation were to increase, the identified user capacity would protect and enhance fisheries and the whole ecological system's ORVs by limiting disturbance in riparian areas.

As mentioned above, the Proposed Action identifies management actions that are designed to improve water quality and wildlife habitat in the WSR corridor. Actions include the potential to implement large scale projects such as addressing the meander cut off and decommissioning of the nonfunctioning stream gauging weir. Other actions include developing a road management plan, evaluating opportunities to reduce non-natural sources of sediment coming off the Golden State Highway into Osito Canyon, addressing infrastructure-related sediment from the Frenchman's Flat area and potential rehabilitation of user created campsites. Rehabilitation efforts to reduce non-natural sources of sedimentation would improve water quality and riparian habitat in the corridor. Forest Service Best Management Practices would be applied for all activities to ensure compliance with the Clean Water Act (USDA Forest Service 2012a) and other design features specified for this project.

Cumulative Impacts

The cumulative effects analysis area includes the 6th field drainage (HUC 12 – Fish Creek-Piru Creek – 180701020602) encompassing the project area. Present, ongoing and reasonably foreseeable projects or actions that may contribute to cumulative effects include activities on both federal and non-federal land. Reasonably foreseeable projects with the potential to affect wildlife include Frenchman's Flat Recreation Site Improvements, as well as planned decommissioning and rehabilitation of Cherry Canyon Road (6N30). Cumulative effects from these actions are considered to be adverse but minor in the short-term and beneficial in the long-term. Recreation driven impacts would be substantially reduced when the Frenchman's Flat project is complete. That project includes limiting and concentrating recreational access to "hardened" areas, e.g., rock steps, rehabilitation of impacted areas, potentially adding an additional toilet, and riparian planting. Recreation site improvements would focus on Frenchman's Flat and would enhance water quality and resource sustainability, keeping recreational impacts concentrated in portions of the recreational segment of Piru Creek. These efforts would lead to decreased sedimentation and help maintain lower stream temperatures in warmer times of the year ultimately benefiting the wildlife ORV.

Combined with the minor adverse impacts of the No-Action Alternative in which degradation may continue and improvements to fish habitat would be slower, the overall cumulative impact from past, present, and reasonably foreseeable projects would be beneficial due to the enhanced water quality, concentration of recreation impacts, and decreased sedimentation. Under the Proposed Action, the overall cumulative impact would be beneficial due to the benefits that would occur as a result of the management actions proposed.

RECREATION

Affected Environment

The recreational segment of Piru Creek contains the Frenchman's Flat Picnic Area and the Golden State Highway, an approximately 2-mile paved road converted to non-motorized trail, that provides the primary access to Piru Creek. Along this route, the primary uses are bicycling, swimming and water play, dispersed picnicking, dispersed camping along the creek at Frenchman's Flat, and catch and release fishing for wild (non-hatchery) trout. Dispersed overnight camping opportunities are concentrated along the river for about one quarter mile north of Frenchman's Flat. The recreational segment primarily provides the local population within the Metropolitan Southern California region river access and dispersed recreational opportunities. Other recreational activities in the recreation section include geologic interpretive uses. Features such as the Ridge Basin and the San Gabriel Fault where it crosses Piru Creek attract academic and other geologic interest groups.

Use levels in this segment are high, and on busy weekend days during the high use periods of April to November can exceed the parking capacity (60 striped spaces) with maximums of 100 or more cars. The climate is mild to temperate, typical of Southern California, and allows for year-round use of most reaches of Piru Creek. An estimated 90 percent of visitors are from the local area. The recreation experience is similar to other major rivers in the region with developed sites and road or trail access along them, such as West Fork San Gabriel and Santa Ynez Rivers, and Manzana and Lytle Creeks. A lack of shade and high temperatures in the summer limit hiking use along the Golden State Highway. Some hiking occurs on user developed trails south of Frenchman's Flat, until the canyon narrows substantially just upstream of the Sespe Wilderness and wild segment of Piru Creek. The recreational segment of Piru Creek is a catch and release stream for angling under CDFW Regulations.

The wild segment, located entirely within the Sespe Wilderness, does not contain any National Forest System trails and, in some sections, the river flows through a narrow canyon where travel is restricted to directly within Piru Creek. Non-technical canyoneering is known to occur within Piru Gorge and the corridor provides access to a more technical route in Ruby Canyon. The wild segment offers opportunities for solitude and primitive recreation that are typical of most wilderness areas including fishing, dispersed camping, and backpacking opportunities. Use levels are very low, estimated no more than 450 visitors annually[5].

Advanced-level whitewater boating occurs in this segment, featuring Class IV rapids. Boating opportunities are limited to those instances, typically during very wet winters, when Pyramid Dam can release high enough volumes to accommodate boaters (minimum of approx. 200-300 cfs). During the period from 2007 through 2017, there were four years where there were no opportunities for boating, while in other years, as many as 16 boating days were possible (CDWR 2019). Even in those instances, boaters report needing to portage some sections. In this wild segment, however, the combination of a remote and wild primitive setting, outstanding scenic combinations of color and landform, easy access

[5] Estimates of visitor use in the wild segment range from anecdotal staff estimates of likely fewer than 100 visitors annually in 2020 (USDA Forest Service 2021) to estimates of fewer than 450 visitors annually in 2024.

from Frenchman's Flat, some predictability of flows from FERC license conditions, and class IV rapids, make whitewater boating opportunities rare and unique within the region of comparison

The California State Water Board adopted an amendment to the Water Quality Certification issued by the State Water Board for the relicensing of Pyramid Dam on March 14, 2023. This amendment may increase opportunities for whitewater boating for up to six weekends in the winter season by controlling the timing and rate of SWP water supply deliveries to United Water Conservation District, which are released in addition to the releases of natural inflow. The deliveries to United Water Conservation District are subject to SWP water supply availability on an annual basis. Whitewater boating opportunities may not be available in all years.

Some changes have occurred within the corridor since designation. A double-sided vault restroom was installed at Frenchman's Flat in 2018. Drought years between 2012-2016 resulted in reduced releases from Pyramid Dam. The COVID-19 pandemic in 2020 substantially increased visitation at all national forests in the region. In 2018-2019 the Department of Water Resources installed a flood warning system, and a series of flood danger signs along the recreational segment of Piru Creek.

CDFW ceased stocking rainbow trout around 2008 in Piru Creek to avoid potential impacts to endangered species. As a result, the recreational fishing opportunities have diminished, although trout do persist in Piru Creek WSR. Angler survey data collected for CDFW by the Fisheries Resource Volunteer Group shows a range of 0.4 – 1.9 fish caught per hour. There are a set of catch and release regulations for approximately 1 mile of Piru Creek recreational segment that prohibit any take of fish, from the start of the WSR 300 yards below Pyramid Dam to the falls upstream approximately a half mile of the Golden State Highway bridge (CDFW 2024).

Impacts of No-Action Alternative

Under the No-Action Alternative, the CRMP would not be adopted. Existing law, regulation, policy, Executive Orders, and special area plans (as applicable) would therefore continue to guide management of this section of the river. Further, no user capacity framework would be implemented. Impacts to visitors' recreation experience are expected to continue to occur if the CRMP is not adopted, such as from crowding in the Frenchman's Flat area.

Impacts of Proposed Action

Recreation is an ORV in the wild segment of the WSR corridor; no impacts to recreation as an ORV are anticipated under the Proposed Action. This analysis focuses on impacts of the Proposed Action on recreation use in the corridor. Under the Proposed Action—adoption of the CRMP—user capacities would be set for the river, with associated triggers for adaptive management action. Separate user capacities were estimated for each of three analysis areas in the corridor: two (Analysis Areas 1 and 2) in the recreational section and one (Analysis Area 3) in the wild segment. The recreational segments of the river are more accessible than the wild segment, while the wild segment is less accessible and offers fewer recreational opportunities. User capacity for day use in the recreational segment was estimated at 200 visitors per day in Analysis Area 1 and 480 people per day in Analysis Area 2, which contains the popular Frenchman's Flat campground. User capacity for overnight use in Analysis Area 2 was estimated

at 10 people per night. User capacity for Analysis Area 3, in the wild segment, was estimated at 450 people per year.

If any of these capacities are exceeded for a certain period of time, there could be detrimental impacts on recreation due to overcrowding, increased human disturbance, and higher levels of waste and debris. Upon adoption of the CRMP, use levels at these river segments would be monitored annually to determine whether user capacity has been reached or exceeded.

The CRMP user capacity analysis outlines a set of social and natural resource-based monitoring indicators, triggers, and thresholds that would initiate adaptive management actions. These are described in full in the User Capacity Report, Appendix B of the CRMP. The indicators are:

1. Social: People-at-one-time (PAOT) (Analysis Area 1, 2, and 3)
2. Social: Number of camping groups per night (Analysis Area 2 only)
3. Resource: Length of visitor-created trails (Analysis Area 1, 2, and 3)
4. Resource: Extent of visitor-created day-use and overnight recreation sites (Analysis Area 1, 2, and 3)
5. Resource: Number of visitor-created rock dams (Analysis Area 1, 2, and 3)
6. Resource: Number of instances of improperly disposed human waste (Analysis Area 1, 2, and 3)

Examples of adaptive management actions that would be triggered if these conditions are met include educating visitors about low impact behaviors, monitoring PAOT annually, discouraging roadside parking during peak periods, and implementing additional signage or enforcement to keep visitors from camping outside designated areas. If needed, the feasibility of a reservation system could be explored for overnight camping and/or daily use in order to distribute visitor use across days of the week.

Triggering any of the Proposed Action's adaptive management actions, described in Appendix B of the CRMP, could impact visitors' recreation experience in the corridor. If adaptive management measures were taken, such as discouraging roadside parking to reduce developed recreation site crowding, the quality of the visitor's experience could improve. The impacts of some adaptive management measures could be a mix of beneficial and adverse impacts on the recreation experience. Reducing potential crowding would improve the quality of the experience but adversely impact the access to that experience.

If the need to consider exploring a reservation system were triggered, additional impacts on some visitors could follow. Researchers have studied barriers to recreation participation on national forests by low-income as well as racially and ethnically diverse visitors, including cost barriers (see, e.g. Charnley et. al. 2018). Implementation of a fee reservation system in the corridor such as on recreation.gov, either for developed day use areas or overnight camping, could act as a barrier to recreation participation by some user groups. Strategies to help alleviate those cost barriers, such as work exchanges, or fee-free days, could be considered at that point.

Cumulative Impacts

Reasonably foreseeable projects with the potential to affect recreation include recreation site improvements at Frenchman's Flat. Cumulative effects from these actions are expected to be a mix of adverse and beneficial when combined with the effects of the No-Action Alternative. Cumulative effects

from these actions are expected to be beneficial when combined with the effects of the Proposed Action. The Frenchman's Flat Recreation Site Improvements project, including limiting and concentrating recreational access to "hardened" areas, e.g., rock steps, rehabilitating impacted areas, potentially adding an additional toilet, and riparian planting, would enhance the visitor experience in that section of the corridor.

CLIMATE CHANGE

Affected Environment

The effects of global climate change occur throughout the WSR corridor. To better understand current effects as well as future impacts from climate change, the Forest Service analyzed climate change trends within the WSR corridor using the *Fifth National Climate Assessment* (NCA5), which is the most recent published assessment by the U.S. Global Change Research Program. NCA5 divides the country into 10 climate regions, covering California as part of the Southwest region. To assess existing climate change conditions, the FS reviewed key climate trends in the Southwest region. The FS also reviewed county-level information from tools such as the USGS Climate Change Viewer. FS based its analysis of predicted climate change outcomes on future scenario models. As part of the Coupled Model Intercomparison Project, Phase 5 (CMIP5) used scenarios called Representative Concentration Pathways (RCPs). RCPs estimate factors such as emissions, greenhouse gas concentrations, and particulate matter; various climate models use these data to predict future climate outcomes (USGCRP 2018). The RCP4.5 is considered a lower scenario with less warming, in which lower population growth, more technological innovation, and lower carbon intensity occur. The RCP8.5 is associated with more warming and higher population growth, less technological innovation, and higher carbon intensity (USGCRP 2018). More recently, NCA5 uses CMIP6, which utilizes Shared Socioeconomic Pathways (SSP). Per NCA5, the RCP4.5 scenario correlates to SSP2-4.5, which can be described as an "intermediate scenario" (USGCRP 2023). The RCP8.5 scenario correlates to SSP5-8.5 or a "very high scenario." These are defined as follows:

- Intermediate scenario: These scenarios reflect reductions in CO_2 emissions from current levels. Total annual CO_2 emissions in 2100 are 46% (RCP4.5) and 67% (SSP2-4.5) less than the year 2000. Mitigation efforts include low-carbon technology (SSP2-4.5) and expanded renewable energy compared to 2000 (RCP4.5).
- Very High scenario: These scenarios reflect the highest range of CO_2 emissions and no mitigation. Total annual global CO_2 emissions in 2100 are quadruple emissions in 2000 (RCP8.5 and SSP5-8.5). Population growth in 2100 doubles from 2000 in RCP8.5, but the SSP5-8.5 population remains relatively stable, with approximately 13% growth in 2100 from 2005. Both scenarios include fossil fuel development, but SSP5-8.5 has higher economic growth than RCP8.5 (Arias et al. 2021, Gidden et al. 2019, Meinhausen et al. 2020, O'Neil et al. 2017, Riahi et al. 2017, van Vuuren et al. 2011 in USGCRP 2023).

The Southwest has seen intense episodes of drought and extreme heat events, which are exacerbated by climate change. Ecosystems in the region vary from deserts and grasslands in the hotter, lower elevations to forests and alpine meadows in cooler, higher elevations (USGCRP 2023). Both naturally occurring and human-caused wildfires are prevalent and affect the forest and shrub cover in the region. NCA5 notes that

climate change in particular is altering ecosystem services via substantial vegetation shifts and increases in wildfire-burned areas. Climate change has contributed to the drying of forests in the Southwest, which has made them more susceptible to burning. Specifically, half of the state's largest 20 wildfires have occurred within the last 10 years (USDA Forest Service 2024). Fires have become larger and more severe, which are likely to continue in coming years (USGCRP 2023).

Droughts caused by low total precipitation in the region are intensified by warming temperatures. Projected higher temperatures in the future may potentially lead to longer, persistent droughts that last more than a decade (known as "megadroughts") (USGCRP 2023). Drought may also reduce water supply and threaten biodiversity (LA County 2021).

The region is also simultaneously experiencing heavier precipitation events and snowmelt conditions which contribute to increased flooding, including extreme events such as atmospheric rivers (USGCRP 2023). Further compounding the effects of extreme precipitation are rising air temperatures and the effects it has on changing vegetation and the potential for forest fires within the watershed. Vegetation improves absorption of rainfall, reduces the rate at which runoff flows into receiving channels, and provides bank and floodplain stability, habitat, and cooling effects. A change or reduction in the density or type of vegetation within the watershed may lead to higher rates of runoff and flash flooding. High intensity rainfall events that occur within areas recently destroyed by forest fires often result in increased runoff rates, more intense flash flooding, and significant sediment transport from upland soils into the stream valley.

The Forest Plan acknowledges the ongoing challenges presented by a changing climate and altered natural fire regimes, including forest pest management, the risk to adjacent communities and land, and managing at-risk areas where threatened, endangered, proposed, candidate, and sensitive species live (USDA Forest Service 2005).

LA County is expected to experience the following temperature and precipitation changes in future years, as compared to historic conditions:

Table 4. Projected Temperature and Precipitation Changes in LA County, California under the SSP2-4.5 and SSP5-8.5 Scenarios

LA County Scenario	Projected Temperature Change[1] (degrees Fahrenheit)	Projected Precipitation Change[2] (inches per month)
SSP2-4.5	+2.89	-0.01
SSP5-8.5	+3.37	-0.03

Source: Alder and Hostetler 2013

[1] Change is the difference in mean annual temperature between historical data (1981-2010) and the future climatology period from 2025-2049

[2] Change is the difference in mean annual precipitation (measured in inches per month) between historical data (1981-2010) and the future climatology period from 2025-2049.

Impacts of No-Action Alternative

Under the No-Action Alternative, the CRMP would not be implemented and existing laws, Executive Orders, regulations, policies, and special area plans would continue to guide the management of the Forests' resources. The Forests' susceptibility to burning as the climate trends towards hotter and drier conditions could potentially increase. Climate trends towards hotter and drier conditions could potentially increase. In addition, as temperatures warm, precipitation events are predicted to become shorter and more intense, reducing the likelihood and amount of infiltration, and increasing the frequency and intensity of flooding, which would put additional stress on the current channel and floodplain and may lead a higher rate of sediment transport, bed and/or bank erosion, floodplain erosion, and possible channel migration. The changes to the affected environment of the project area resulting from climate change would continue to occur even if the No-Action Alternative were selected. The No-Action Alternative would not impact global climate change processes or the WSR corridor's ability to adapt to climate change.

Impacts of (and on) Proposed Action

To evaluate climate change impacts on the Proposed Action, the FS reviewed NCA5 to determine the range of effects climate change would have on the implementation of the CRMP. This section also considers the impacts of CRMP implementation on global climate change.

As described above in the "Affected Environment" section, the region surrounding Piru Creek is expected to see an increase in drier forests in the coming years, which makes these areas more susceptible to wildfires. In addition, as temperatures warm in the future and lead to potential droughts as well as smaller snowpack volumes, water levels in Piru Creek may be reduced, ultimately affecting the ORVs which owe their existence to the river (USGCRP 2023). As the climate trends towards hotter and drier conditions and temperatures warm, precipitation events are predicted to become shorter and more intense. This could reduce the likelihood and amount of infiltration and increase the frequency and intensity of flooding, which put additional stress on the current channel and floodplain and may lead to higher rates of sediment transport, bed and/or bank erosion, floodplain erosion, and possible channel migration. The management actions included under the Proposed Action could beneficially impact some of these effects, for example, through actions to address erosion to the stream bank.

When considering the impact of the activities described under the Proposed Action, there would be no impact on global climate change. On the Forest as a whole, there would be no substantial alteration to the carbon cycle (i.e., trees' ability to absorb carbon dioxide in the atmosphere and convert it to oxygen) when considered in the context of global climate change.

OTHER DISCLOSURES

Civil Rights and Environmental Justice (EJ)

There are no known direct, indirect, or cumulative effects on Native Americans, minority groups, women, or civil rights as a result of this project analysis.

EJ is defined by the EPA as the fair treatment and meaningful involvement of all people, regardless of race, color, faith, national origin, or income, in the development, implementation, and enforcement of environmental laws, regulations, and policies. To the extent practical and permitted by law, all populations are provided the opportunity to comment before any decisions are made and to share in the benefits of government programs and activities affecting human health and the environment. An EJ community is generally defined as any low-income community or community of color, as these communities have historically experienced disproportionate impacts of pollution and environmental degradation. The consideration of EJ communities in environmental planning and project development aids in the prevention of the unequal treatment of vulnerable EJ communities that can lead to adverse effects on public health and quality of life.

To identify potential EJ communities near Piru Creek, EJ screening was performed using the EPA webtool EJSCREEN on September 20, 2024 on the U.S. Census Bureau Block Group through which the river runs, Blockgroup 060379201041. The Forest Service analyzed three key indicators to determine whether any communities of concern existed within the blockgroup and thus, within the project area: low-income populations, linguistically isolated populations, and minority populations. For each indicator, the Forest Service identified thresholds; if any indicator exceeded the threshold, it was considered a community of concern. The thresholds for low-income populations, linguistically isolated populations, and minority populations were 25% or greater, 5% or greater, and 50% or greater, respectively. Considering these thresholds, no communities of concern were identified within Block Group 060379201041 (EPA 2024). In addition, the Proposed Action is administrative in nature and does not involve any ground-disturbing activities. Further, scoping has raised no issues or concerns associated with the principles of EJ. The Proposed Action is not anticipated to result in substantial environmental hazards or effects to differential patterns of consumption of natural resources. All interested parties will continue to be involved in commenting on the project and the decision-making process for the project.

Congressionally Designated Areas

Portions of the Congressionally designated Sespe Wilderness are contained within the Piru Creek WSR, but, would not be adversely affected by the Proposed Action. Section 10(b) of the Wild and Scenic Rivers Act states that

> "*any portion of a component of the national wild and scenic rivers system that is within the national wilderness preservation system…shall be subject to the provisions of both the Wilderness Act and this Act with respect to preservation of such river and its immediate environment , and in case of conflict between the provisions of these Acts the more restrictive provisions shall apply".* . (16 USC 1281, as amended)

The five qualities of wilderness areas are natural, untrammeled, undeveloped, solitude or primitive and unconfined recreation, and other values. The Proposed Action would not adversely affect the Sespe Wilderness' natural, untrammeled, or undeveloped qualities or its ability to offer opportunities for solitude and primitive recreation. The Proposed Action does not include any permanent improvements or signs of human control, nor does it impact the ability of the wilderness to offer opportunities for primitive recreation, Furthermore, any future proposed uses of prohibited uses under Section 4(c) of the Wilderness Act would be analyzed using minimum requirements analysis as part of project-level planning.

Prime Farm and Forest Lands

The Secretary of Agriculture issued Memorandum 1827 to protect prime farmlands, rangeland, and forest land. Prime forest land describes only non-federal land and is therefore not applicable to lands within the National Forest System, including the WSR corridor. The National Forest lands within the project area would be managed with consideration of impacts to private lands. The project area does not contain any prime farmlands or rangelands. Thus, the Proposed Action is in compliance with the Farmland Protection Act (USDA 1981) and Departmental Regulation 9500-3, Land Use Policy (USDA 1983).

On May 24, 1977, Executive Orders 11988 and 11990 (pertaining to floodplains and wetlands) were both issued. These executive orders require that all federal actions in or affecting the floodplain or wetlands be reviewed for opportunities to relocate, and evaluated for social, economic, historical, environmental, legal, and safety considerations. Executive Order 11988 (Floodplain Management) outlines guidance related to floodplains, defined as low, flat areas adjacent to water bodies and subject to a one percent or greater chance of flooding in any given year. The Order directs agencies and other project planners to avoid occupancy and modification of floodplains where possible, provide measures to reduce the risk of flood-related loss, and evaluate project impacts on floodplains.

For projects containing floodplains and wetlands, the Forest Service should locate facilities, trails, restrooms, campsites, and other project elements out of floodplains or wetlands, in order to be compliant with these executive orders.

Proposed project activities would avoid floodplains where possible and strategically locate and implement best management practices to minimize impacts to facilities in floodplains. No projects are proposed in wetlands. The design features call for locating all designated campsites and restrooms, along with trails where feasible above the 100-year floodplain based on a hydrographic study floodplain analysis which would be completed before project implementation. This does not include river access infrastructure such as boat launches or access roads, which would be designed and located strategically within the floodplain. Location of proposed activities and application of relevant design features ensure minimal impacts on floodplains and wetlands and consistency with these executive orders.

There would be no direct, indirect, or cumulative adverse effects to prime farmlands, rangelands, prime forest lands, or floodplains as a result of the Proposed Action.

Compliance with Other Policies, Plans, Jurisdictions

The alternatives are consistent with the goals, objectives, and direction of the Forest Plan, the accompanying final environmental impact statement, and the record of decision. Implementation of the No-Action Alternative or the Proposed Action would be consistent with all relevant federal, state, and local laws, regulations, and requirements designed for the protection of the environment, including the Clean Air and Clean Water Act.

Section 106 of the National Historic Preservation Act

Consultation with the California State Historic Preservation Officer (SHPO) pursuant to Section 106 of the NHPA, as amended, and its implementing regulation found at 36 CFR § 800 is ongoing. The CRMP is

considered an “undertaking” as defined at 36 CFR 800.3 and requires analysis regarding the effect of the proposed plan on historic properties. The Area of Potential Effects (APE) for the proposed undertaking is the congressionally defined corridor as identified above.

As agreed between agencies and concurred by the SHPO, the *Programmatic Agreement Among the USDA Forest Service, Pacific Southwest Region (Region 5), California State Historic Preservation Officer, Nevada State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding the Processes for Compliance with Section 106 of the National Historic Preservation Act for Management of Historic Properties by the National Forests of the Pacific Southwest Region* (Region 5 PA) is the appropriate mechanism to comply with Section 106. Wild and Scenic River Plans are specifically identified as a Class B Screened Undertaking that will have little to no potential to cause effects to historic properties present in the APE (USDA FS 2012b). This planning effort will have no effect to historic properties eligible for listing or listed in the National Register. Future activities that may be proposed within the WSR corridors will require additional Section 106 review, including, but not limited to field inventory and consultation with the SHPO and tribes.

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Appendix A: Draft EA Comment Analysis

DRAFT EA Comment Analysis

Notice of availability of the Draft EA was posted in the Antelope Valley Press on October 28th, 2024. Comments concerning the Draft EA were identified from participants' correspondence. Written correspondence received from the following individuals and organizations form the basis for addressing the comments.

This table organizes and summarizes substantive comments received on the draft EA, CRMP, and attachments for the Piru Creek CRMP. All correspondence has been reviewed by the interdisciplinary team in order to address the comments. The following table lists the comments received and responses. The interdisciplinary team considered these comments while completing the Final EA.

Table 1. Draft EA Comments

Summary of Comments	Commenter	Public-facing Response
"Continue full participation in FERC relicensing for Pyramid and Santa Felicia Dams, in order to implement Federal Power Act conditions for resource protection, ~~including the Road Management Plan~~."	Aaron Miller, DWR	Thank you for your comment. Text corrections were made accordingly.
Recommend additional trash receptacles and porta potty at Frenchman's Flat	Boller, Scott	The Forest Service intends to undertake improvements to the Frenchman's Flat recreation site, which may include, amongst other improvements, new toilets and garbage cans.
Recommend minimum flow during summer months for native rainbow trout	Boller, Scott	Dam releases are governed by FERC license conditions and are outside the scope of this CRMP.
DWR supports this area for education. However, DWR would like coordination before educational group visits.	Jeremiah McNeil, DWR	Text was revised accordingly
The CRMP (page 11) and EA (pages 16 and 27) discusses a nonfunctioning United States Geological Survey (USGS) gage located adjacent the channel spanning concrete "weir" and incorrectly refers to this gage as USGS gage 1109525 Piru Creek below Pyramid Lake near Gorman, CA. Gage 11109525 is located immediately below Pyramid Dam (Latitude 34°30'30" N, Longitude 118°45'49" W) and is owned by DWR. It is likely that the nonfunctioning USGS gage inferred in the EA is USGS gage 1109550 Piru Creek Above Frenchman's Flat CA (Latitude 34°37'51" N, Longitude 118°44'51" W).	Jeremiah McNeil, DWR	Thank you for your comment. Revisions were made throughout the CRMP and EA documents to clarify that the nonfunctioning stream gage is the channel-spanning weir, # 11109550, not #11109525.
The EA, on page 3, conflates the terms designation and classification in the first paragraph on page 2. To ensure accuracy, the text should be corrected to state: "A total of 4.25 miles of the river are classified as wild, and 3 miles are classified as recreational."	American Whitewater	Thank you for your comment. Text corrections were made accordingly.
On page 11 of the EA, the acronym OHWM should be defined as "ordinary high water mark" to ensure clarity for all readers and consistency with standard terminology used in hydrology and river management	American Whitewater	Thank you for your comment. Text corrections were made accordingly.
Submitted updated flow data; EA/CRMP data is out of date by relying only on data through 2017; AW flow data submission proves since 2017 there have been more boatable days; request data be updated	American Whitewater	The free flow sections of the EA and CRMP were revised to include streamflow data through September 2023
Piru Creek wildlife value does qualify as ORV. The rationales include: • Condors (see also attached figure) • SWWF habitat (see also attached figure) • Other species (see also attached figure) • Southwestern pond turtle is located in Frenchman's Flat, which experiences high recreational use. • Lack of data on arroyo toad presence. • Connectivity	Center for Biological Diversity (CBD)	In recognition of the concentration of special status species habitats, and uniqueness of resident condor populations, the River Values Report, as well as all other CRMP documents, have been amended to conclude that the entire Piru Creek WSR has an ORV for wildlife.
CRMP p. 25: "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 & Wildlife in achieving desired conditions for fisheries." This has the potential to further imperil the population of federally endangered arroyo toad present in Piru Creek due to increased predation associated with steelhead and the change in habitat to support steelhead. Consideration must be given to how the reintroduction of steelhead and the change in required habitat may affect the existing arroyo toad population	Jeremiah McNeil, DWR	The intent of the CRMP (p. 25) is to acknowledge/demonstrate support for reintroduction through management actions outlined in the CRMP that would benefit steelhead, i.e., improving habitat, reducing resource degradation (e.g., access road, recreating public) and restoration work. The ANF is obligated under the ESA to support these types of species recovery actions. Any potential species conflicts would be analyzed/addressed by the relevant regulatory agencies (USFWS and NMFS) through ongoing administration of the FERC license for Santa Felicia Dam.
DWR would like to provide the following suggested text (italicized below) to help clarify that the flow releases for whitewater boating are subject to available SWP water supplies	Jeremiah McNeil, DWR	Thank you for your comment. Text corrections to the CRMP and EA were made accordingly.

Summary of Comments	Commenter	Public-facing Response
being delivered to United Water Conservation District: This amendment may increase opportunities for whitewater boating for up to six weekends in the winter season by *controlling the timing and rate of SWP water supply deliveries to United Water Conservation District, which are released in addition to the releases of natural inflow. The deliveries to United Water Conservation District are subject to SWP water supply availability on an annual basis. Whitewater boating opportunities may not be available in all years.*		
DWR looks forward to collaborating on a Road Management Plan with the USFS, however a Road Management Plan is not included in DWR's FERC relicensing Protection, Mitigation, and Enhancement measures. A plan of this nature has not been included because the roads the USFS is looking to collaborate on management of near Piru Creek are almost entirely outside DWR's FERC project boundary. The roads in this area have shared uses and are not solely for FERC project use. Therefore, collaboration on a Road Management Plan should remain separate from the FERC relicensing process. DWR suggests removing "including the Road Management Plan" from the proposed Management action. DWR appreciates the USFS's full participation in the FERC relicensing process to date and looks forward to future collaboration	Jeremiah McNeil, DWR	Thank you for your comment. Text corrections to the CRMP and EA were made accordingly.
While the existing FERC license expired for South SWP Hydropower, which includes the licensed-facility Pyramid Dam, DWR and LADWP are currently operating under an annual FERC license that maintains the existing license terms and condition until FERC issues a new license. For clarification purposes, the CRMP refers to the "Pyramid to Castaic tunnel." This tunnel is called the Angeles Tunnel.	Jeremiah McNeil, DWR	Thank you for your comment. Text corrections were made accordingly.
Pyramid Lake has a storage capacity of 161,375 AF. This storage capacity should also be corrected in the EA, page 15	Jeremiah McNeil, DWR	Thank you for your comment. Text corrections were made accordingly.
The FERC license for Pyramid Dam includes access adits to the tunnel that is part of the hydroelectric infrastructure, as well as a paved road across Piru Creek to access these adits. (p 11) DWR recommends moving this explanation up to the first mention of the adits, at the top of page 9.	Jeremiah McNeil, DWR	Thank you for your comment. Text clarifications at first reference were made accordingly.
DWR suggests correcting "19822" to 1982, or clarify what 19822 refers to. DWR is usure what "Article 52.26" refers to. DWR suggests correcting to state "Articles 51 and 52" or clarify what 52.26 refers to. Note that these corrections are also recommended for page 27 of the companion Environmental Assessment.	Jeremiah McNeil, DWR	Thank you for your comment. Text corrections were made accordingly.
Since the federally endangered arroyo toad utilizes natural sedimentation within the Piru Creek system for its lifecycle, DWR recommends that references to "sediment elimination and reduction" be specific to shoreline and recreation-created erosion.	Jeremiah McNeil, DWR	Thank you for your comment. Relevant sections were edited to reflect the fact that non-natural sources of sedimentation are what the management actions are trying to address.
There should be a recreation (whitewater) ORV upstream of Frenchman's Flat.	American Whitewater	Whitewater boating opportunities in the recreational segment are not rare or unique and lack the potential to draw visitors from throughout and outside of the region of comparison. Furthermore, vehicle access is not allowed to this segment under the current Angeles Motor Vehicle Use Map and Forest Service travel regulations, and potential put in locations for whitewater boaters are less safe and convenient to access than Frenchman's Flat.
In the section titled Federal Reserved Water Rights (Final CRMP, p. 7), update the language to explicitly include recreation as an Outstandingly Remarkable Value (ORV), alongside the recognized values of fisheries and geology. This ensures consistency with the CRMP's acknowledgment of recreation as an ORV for the wild segment of Piru Creek.	American Whitewater	Thank you for your comment. The Federal Reserved Water Rights Section was revised accordingly.
Although Pyramid Dam is located just upstream of the designated Wild and Scenic River (WSR) and outside the WSR corridor, other components of the South State Water Project are situated within the corridor. These include DWR's debris pile, adits, and other physical infrastructure associated with the project. The Land Uses and Access in River Corridor section (Final CRMP, p. 8) should be updated to provide a more comprehensive description of these uses and their presence within the WSR corridor to ensure clarity and completeness	American Whitewater	Thank you for your comment. The Land Uses section was revised as needed.

Summary of Comments	Commenter	Public-facing Response
The USGS gage number referenced on page 11 of the CRMP should be corrected to 11109525. This most recent monthly streamflow statistics from this gage date to September 2022; therefore this gage can only provide streamflow data up to that date, not to the present as stated in the CRMP. USGS gage 11109550 (Piru C AB Frenchmans Flat CA), also now defunct, provides data through May 1, 2023. The Department of Water Resources' Pyramid Dam outflow gage (PYM) provides data from 2007 to present (available via California Data Exchange Center) . For consistency, we suggest that DWR's gage be used to characterize flow for the 2007-present time period and that one of the USGS gages be used to characterize flow prior to 2007.	American Whitewater	Thank you for your comment. Revisions were made throughout the CRMP and EA documents to clarify that the nonfunctioning stream gage is the channel-spanning weir, # 11109550, not #11109525.
The CRMP uses monthly mean flow values to characterize Piru Creek's streamflow. For a flashy, desert stream like Piru Creek, this approach lacks the detail necessary to describe its highly episodic flow regime. The use of monthly means overlooks high-magnitude, short-duration flow events, which characterize Piru Creek's flow and are critical in shaping the creek's physical setting and supporting its Outstandingly Remarkable Value (ORV) for whitewater recreation. The baseline conditions section should include a detailed discussion of these episodic flows, highlighting their role in creating and sustaining the river's unique attributes. This discussion should specifically address the flow conditions necessary to support whitewater recreation, including an analysis of peak flow events and their frequency, duration, and timing. The Affected Environment section of the EA should be correspondingly updated.	American Whitewater	Thank you for your comment. Additional description was provided; detailed analysis of the channel forming flows that sustain the river's attributes would require extensive survey of in-situ channel morphology in tandem with more precise gage data that is currently not publicly available.
The CRMP's desired conditions in its management direction (Final CRMP, p. 22) notably lack any reference to the recreation ORV for the wild segment. To support this ORV: 1. Creek access at Frenchman's Flat should be managed to allow boaters to launch their craft within a reasonable distance of the parking area. This can align with the broader goal of providing reasonable access to all visitors, not just boaters, and likely requires no special accommodations. 2. Given the unique setting and conditions encountered while whitewater boating on Piru Creek, the desired conditions should include providing adequate information through signage or an information kiosk to enhance visitor preparedness and safety.	American Whitewater	Thank you for your comment. A recreation Desired Condition for the Wild section was added.
The potential future management action related to signage and information should be moved to the Management Actions section. Appropriate signage and an information kiosk at key locations, including Frenchman's Flat, would address multiple management needs. In addition, the kiosk could include a river user registration box to support a recreation monitoring program, further enhancing management effectiveness.	American Whitewater	Thank you for your comment. All site-specific management actions detailed in the CRMP would require additional future NEPA analysis as well as other appropriate compliance prior to implementation. Furthermore, the management action section does include some outreach actions at Frenchman's Flat, including developing an educational kiosk.
To ensure an accurate and informed portrayal of the river's recreational value, the Final CRMP, its River Values Assessment, and EA should: 1. Incorporate the most current and complete flow data (2007–2024) provided by American Whitewater. 2. Recognize boatable days as a key metric for evaluating whitewater recreation opportunities. 3. Highlight the importance of managed flow events in supplementing natural flows to enhance boating opportunities.	American Whitewater	Thank you for your comment. Flow data was updated accordingly. Because boatable days are not influenced by any CRMP management actions and are dependent on rainfall, FERC license conditions, and demand for water, it is not included as an official monitoring metric. The ANF welcomes ongoing input and data from partners such as American Whitewater.
The CRMP must provide a timetable for securing water rights for Piru.	CBD	"Section 13(c) of the Wild and Scenic Rivers Act expressly *reserves the quantity of water necessary* to achieve the Act's purposes for each WSR designation, unless specified otherwise." The reservation doctrine itself secures water right through the legislative authority.
In light of the ancestral steelhead heritage of the O. mykiss currently occupying the reach of Piru Creek (and its tributaries) between Santa Felicia Dam and Pyramid Dam, suggest rephrase from the term "reintroducing" steelhead to "re-integrating" or "re-connecting"	Mark Capelli, National Marine Fisheries Service (NMFS)	Thank you for your comment. The relevant management action and desired conditions were edited to more accurately characterize the status of the population.
We respectfully incorporate by reference the comments we submitted on the Draft CRMP on August 30, 2024, and are resubmitting them now to ensure they are included in the NEPA record for this plan.	American Whitewater	Thank you for your comment. The comments submitted on the Draft CRMP are included in the project record.

Summary of Comments	Commenter	Public-facing Response
Commenter has a question about FS's commitment to proposed monitoring actions: The analysis states that poorly aligned visitor-created day use sites can be replaced with sustainably designed ones but it is unclear whether the CRMP commits to these actions	CBD	The CRMP does not directly implement any ground-disturbing actions. All future projects in the river corridor would require site-specific National Environmental Policy Act (NEPA) analysis. All potential adaptive management actions listed in the CRMP would be considered, if needed and feasible.
The EA analysis does not address the impact of recreation use, particularly at Frenchman's Flat, on wildlife.	CBD	The user capacity analysis in the CRMP focuses on river values (free flow, water quality, and ORVs) that may potentially be impacted by visitor use. The report has been amended to acknowledge that wildlife is considered an ORV. Following the addition of wildlife as an ORV, the EA analysis was amended to address the impacts of the alternatives on wildlife.
The User Capacity Analysis conflates the terms designation and classification in the first paragraph on page 2. To ensure accuracy, the text should be corrected to state: "In 2009, Congress designated 7.25 miles of Piru Creek on the Angeles and Los Padres National Forests as a Wild and Scenic River (WSR), with 3 miles classified as recreational and 4.25 miles classified as wild."	American Whitewater	Thank you for your comment. Correction made in User Capacity Analysis.
The User Capacity Analysis (page 9) mischaracterizes the effect of Pyramid Dam's presence and management on whitewater recreation in Analysis Area 3 (the wild-classified segment). Furthermore, the forthcoming new license for the South State Water Project is expected to include conditions allowing for additional boatable flows when DWR makes water deliveries to United Water Conservation District via Piru Creek. While these deliveries augment flows in a manner that enhances whitewater boating opportunities, whitewater recreation on Piru Creek is not dependent on the dam or water deliveries for its occurrence. The flows that sustain the creek and its whitewater recreation ORV are neither diminished by the dam's operation nor reliant on these water deliveries.	American Whitewater	Thank you for your comment. User Capacity Analysis has been revised accordingly.
The User Capacity Analysis (page 9) inaccurately implies that recreational use of Piru Creek by whitewater boaters is limited to weekends. The primary constraint on boating use is the episodic nature of boatable flows, not the day of the week on which they occur. Additionally, the analysis should incorporate more current data to characterize the frequency of boating opportunities, rather than relying solely on data from 2007 to 2017. American Whitewater has provided an updated analysis of boatable days on Piru Creek through April 2024, which indicates a significant increase in the number of days with boatable flows since 2017	American Whitewater	Thank you for your comment. Revisions regarding the characterization of whitewater boating use in Analysis Area 3 were made in the User Capacity Analysis.
The User Capacity Analysis overlooks whitewater boating use in the recreational-classified segment upstream of Frenchman's Flat, which should be addressed. Additionally, whitewater boating on Piru Creek occurs almost exclusively outside the peak season identified for other recreational activities (April through October).	American Whitewater	Thank you for your comment. Corrections to the User Capacity Analysis has been made concerning boating use upstream of Frenchman's Flat, as well as the seasonality of the use.
On page 11, the User Capacity Analysis fails to list recreation as an Outstandingly Remarkable Value (ORV) for the wild-classified segment. This omission should be corrected to align with the designation in the CRMP.	American Whitewater	Thank you for your comment. The first full paragraph on page 11 of the user capacity report lists recreation as an ORV for Analysis Area 3, the wild-classified segment.
The discussion of Analysis Area 3 in the Capacity Approach section (pages 24-25) should acknowledge that whitewater boating on the wild-classified reach of Piru Creek does not involve the use or creation of formal or informal trails, and therefore the sedimentation impacts attributed to recreational use in this section do not originate from whitewater boating. Additionally, this section should recognize that whitewater boating use primarily occurs between October and May, outside the peak use period for other recreational activities	American Whitewater	Thank you for your comment. Revisions to the User Capacity Analysis have been made concerning whitewater boating in Analysis Area 3.
Assorted Comments concerning the need for more law enforcement in areas such as gunfire, poaching and greater protection of fish, and graffiti, as well as a need for more signage.	Hellrigel, Dianne	Thank you for your comments.
"To improve natural resource protection, partner with the California Department of Fish and Wildlife (CDFW) to enhance opportunities for presence within the WSR to enforce state	Yin, Bernard	Thank you for your comments.

Summary of Comments	Commenter	Public-facing Response
code; prioritize the training and certification of recreation staff as Forest Protection Officers. Improve bilingual signage within the corridor to address fishing regulations. "		
Should it have any effect or assist with the conversation in any way, I wish to cast my proverbial vote that matters such as litter and other abuses such as poaching of fish re the concerns of many anglers. The "bust" of a party of roughly 40 fishermen remains in the minds of many in the angling/conservation community. This is very high on the list of concerns of the community I am part of.	Yin, Bernard	Thank you for your comments.
California Trout (CalTrout) supports the efforts to restore and manage Piru Creek. These recommended actions as a part of the CRMP will support steelhead populations and contribute to the overall health and integrity of the watershed.	Marlow, Russell, California Trout	Thank you for your comments.
The River Values Assessment (RVA) should reflect that Piru Creek's whitewater recreation ORV is rooted in its natural flow characteristics, with managed releases serving only to supplement and enhance, but not define, its value. This distinction is critical to accurately documenting and protecting the ORV. Although future FERC license conditions are expected to result in an increase in boatable days and a more predictable flow regime while DWR is delivering water to United Water Conservation District, the Outstandingly Remarkable Value (ORV) for whitewater boating recreation is merely augmented by these managed releases, not dependent upon them for its existence. Boating opportunities on Piru Creek below Pyramid Dam already exist without these releases, as flows naturally occur that support whitewater recreation. The Final River Values Assessment (page 9) should clearly state this distinction, as it serves as the formal documentation of ORVs and the rationale for their designation	American Whitewater	Thank you for your comment. The description of the flow regime in the Values Assessment was revised accordingly.