



UNITED WATER CONSERVATION DISTRICT  
“Conserving Water Since 1927”

Santa Felicia Project  
FERC License No. 2153-12

## **Santa Felicia Project Recreation Trail Plan**

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**April 1, 2016**

## Table of Contents

1.0	INTRODUCTION .....	1
2.0	BACKGROUND AND HISTORY OF CONSULTATION .....	1
3.0	ALTERNATIVE ENHANCED TRAIL ACCESS STRATEGY .....	3
3.1	Phased Approach.....	3
3.1.1	Phase 1 Activities.....	4
3.1.2	Phase 2 Activities.....	5
4.0	IMPLEMENTATION PROCESS AND SCHEDULE.....	5
4.1	Project Schedule.....	5
5.0	FUNDING FOR MAINTENANCE OF PROJECT .....	6
6.0	REPORTING .....	6
7.0	ANNUAL CONSULTATION.....	6
	Appendix A - Draft Santa Felicia Project Recreation Plan.....	A1
	Appendix B – List of Stakeholders .....	B1
	Appendix C - Comments Received from Agencies and Stakeholders and United’s Response to these Comments .....	C1
	Appendix D – Copies of Comment Letters in Response to Draft Santa Felicia Project Recreation Trail Plan dated December 30, 2015.....	D1

## **1.0 INTRODUCTION**

The Santa Felicia Project Recreation Trail Plan (Plan) has been prepared to comply with article 411 of the license issued to United Water Conservation District (United) by the Federal Energy Regulatory Commission (FERC) for United's Santa Felicia Project (Project). Article 411 of the license requires that United develop and file a plan for providing trail access to the east side of Lake Piru. The FERC license requires that the plan: 1) identify the location of the existing trail sections to be formalized along the east side of the lake; 2) identify the location and route for providing the missing 1.5-mile trail link between Forest Service roads and other existing trails; and 3) provide a schedule for designing and constructing the new trails. After consultation with the United States Department of Agriculture Forest Service (Forest Service) and California Department of Parks and Recreation (CDPR), United is to file the plan with FERC. The plan is to contain documentation of the consultation, including copies of comments and specific descriptions of how United has accommodated them.

## **2.0 BACKGROUND AND HISTORY OF CONSULTATION**

Subsequent to FERC's issuance of the license, and during initial consultation with the Forest Service, United confirmed that no Forest Service trails or roadways exist in the Angeles National Forest property to the east of the lake, and that other existing private roadways on the east side of the lake are not open to the public. Because of this, in an original Plan dated November 5, 2013, United stated that the article 411 requirement was not valid and therefore United did not intend to install the required trail link. In an order dated March 24, 2014, FERC agreed that United provided sound justification for not pursuing the development of the trail link on the east side of Lake Piru; however, FERC found that United's original Plan failed to identify alternative strategies for meeting trail needs at the Project. FERC directed that United consult with the Forest Service, CDPR, and other interested parties to explore alternative hiking opportunities at the Project and provide a modified plan, or provide justification that no alternative hiking opportunities were feasible. FERC also directed that United's modified plan include recommended changes to its November 5, 2013 Plan, including a schedule of implementation.

The public comments received on the Plan dated November 5, 2013 focused on enhanced trail access on the northwest end of Lake Piru, specifically related to two existing Forest Service trails: Pothole Trail (No. 18W04) and Agua Blanca Trail (No.19W10). Under current conditions, accessing these two trails requires driving through United's Lake Piru Recreation Area (including access through an intermittently locked gate on Piru Canyon Road at Reasoner Canyon), parking at the Juan Fernandez Launch Ramp Facility, walking past a locked Forest Service gate and hiking along the Forest Service-owned portion of Piru Canyon Road across Forest Service property, and United's Lisk Ranch property to the Pothole Trail trailhead. The Forest Service gate (adjacent to Juan Fernandez Launch Ramp Facility) has been closed to public access since 2000 as a resource protection measure for the endangered Arroyo Toad. The gate prevents vehicle access, except by individuals authorized by the Forest Service (private landowners, state, federal, and local agencies, and consultants thereof). Currently, the public is only able to gain access beyond the gate on foot or by non-motorized means (e.g., bicycle). It is approximately 3 miles from the locked Forest Service gate to the Pothole Trail trailhead. The

Aqua Blanca Trail trailhead is several miles further north on Piru Canyon Road, near the former Blue Point Campground.

Subsequent to receiving FERC's March 24, 2014 order and stakeholder comments on the Plan dated November 5, 2013, United resumed consultation with the Forest Service, CDPR, and hiking-related stakeholders regarding alternative hiking opportunities, with a focus on improving access opportunities on the northwest end of Lake Piru in the Los Padres National Forest (shown in Figure 1). That consultation led to a project concept that provides vehicular access to the Pothole Trail through the following measures: 1) United to provide access through the gate on Piru Canyon Road at Reasoner Canyon (either by opening or removing the gate); 2) Forest Service to provide access through the gate on Piru Canyon Road located north of Juan Fernandez Launch Ramp Facility (either by opening or removing the gate); and 3) United to identify a preferred location and construct a trailhead parking lot on United's Lisk Ranch property that will serve the existing Forest Service Pothole Trail (No. 18W04). In addition to these measures, the Forest Service is developing coordinated projects that include enhancements and/or realignment of the Pothole Trail and trailhead, and installation of a new gate between the Pothole Trail trailhead and Blue Point Campground.

On June 10, 2014, United and the Forest Service hosted a site meeting for hiking-related stakeholders and local property owners to visit alternative sites for the proposed trailhead parking lot and provide input. In general, hiking-related stakeholders were supportive of the Forest Service opening Piru Canyon Road north of the Juan Fernandez Launch Ramp Facility, supportive of the conceptual trailhead project, preferred a trailhead closer to the intersection of Piru Canyon Road and Rickenbacker Road on United's Lisk Ranch parcel, and preferred an alternative alignment of the Forest Service's Pothole Trail to lessen its slope. In general, property owners were opposed to opening Piru Canyon Road beyond the Juan Fernandez Launch Ramp Facility, out of concern that it would lead to an increase in trespassing and vandalism, with particular concern over trespassing hunters. The owner of the property located immediately to the west of United's Lisk Ranch parcel, expressed opposition to a trailhead near the intersection of Piru Canyon Road and Rickenbacker Ranch Road, and opposition to the Forest Service considering a realignment of its Pothole Trail that would move the trail closer to their property, out of concern for increased trespassing. Several stakeholders were concerned about the poor condition of the Forest Service's portion of Piru Canyon Road located between the Juan Fernandez Launch Ramp Facility and the proposed location of the Pothole Trail trailhead.

Following the June 2014 stakeholder meeting, United continued consultation with the Forest Service to develop strategies presented in this Plan. These strategies are designed to complement the Forest Service's proposed project to enhance and/or realign the Pothole Trail and trailhead. The Forest Service is in the process of performing an assessment of two corridors for reestablishing the Pothole Trail, and has contracted a consultant to look at the original alignment of the Pothole Trail as well as an alternative alignment on the Reichenbach Road. Both corridors will be considered and analyzed in an environmental review process (in compliance with the National Environmental Policy Act [NEPA]) that is scheduled to begin in spring of 2016. The Forest Service anticipates making a final decision on a trail alignment by early 2017.

On December 31, 2015, United filed a Draft Santa Felicia Project Recreation Trail Plan (Draft Plan) (dated December 30, 2015) with FERC. The Draft Plan is included in Appendix A of this Plan. The draft plan was provided to the Forest Service, CDPR, neighboring landowners and other stakeholders for review and comment. A list of stakeholders is provided in Appendix B. Comments received from agencies and stakeholders, as well as United's response to these comments are presented in tabular form in Appendix C. Copies of the comment letters are in Appendix D.

### **3.0 ALTERNATIVE ENHANCED TRAIL ACCESS STRATEGY**

The following concept strategy outlined in Section 2.0 was developed in consultation with the Forest Service and includes action items by both United and the Forest Service.

*“[Providing] vehicular access to trails through the following measures: 1) United to provide access through the gate on Piru Canyon Road at Reasoner Canyon (either by opening or removing gate); 2) Forest Service to provide access through the gate on Piru Canyon Road located north of Juan Fernandez Launch Ramp Facility (either by opening or removing the gate); and, 3) United to identify a preferred location and construct a trailhead parking lot on United's Lisk Ranch property that will serve the existing Forest Service Pothole Trail (No. 18W04).”*

While the activities are proposed to complement each other, United only has discretion over activities performed by United on United owned property (which include activities identified as 1 and 3 in the paragraph above). Similar to the Forest Service's NEPA environmental assessment process, United will conduct an evaluation of the proposed actions, and alternatives to actions, in compliance with the California Environmental Quality Act (CEQA).

Multiple alternate locations for the trailhead parking lot have been identified. Selection factors considered were size (large enough to accommodate several passenger vehicles and trucks, and trucks with horse trailers), grade, terrain, existing vegetation, proximity to the Piru Canyon Road, potential for flood inundation and proximity to the existing and potentially realigned Pothole Trail. One potential site is located adjacent to Piru Canyon Road at the entrance to the private Rickenbacker Ranch Road, another is in the vicinity of the old Lisk Ranch homestead site (shown in Figure 2). Both sites meet the selection criteria. The location nearest the Rickenbacker Ranch Road has received negative feedback from the adjacent landowner. The CEQA process will include an analysis of impacts including those to local landowners. The preferred location for construction of the Pothole Trail trailhead parking lot will be identified as a product of United's CEQA process and influenced by the outcome of the Forest Service's NEPA assessment.

### **3.1 Phased Approach**

United intends to incorporate a phased approach to implement the activities outlined in this Plan. The reason for the phased approach is associated with safety concerns related to the Forest Service's portion of Piru Canyon Road between Juan Fernandez Launch Ramp Facility and the proposed Pothole Trail trailhead parking lot. As discussed above, this portion of road has been

closed to public access since 2000 for resource protection purposes. The federal government performed repairs to the road following the 2003 Piru Fire, but little or no maintenance has been conducted since that time. With the reestablishment of the Pothole Trail, the Forest Service is seeking funding to make improvements to this section of road.

The Forest Service stated in comments to the Draft Plan that this section of road was built to a standard that allows for vehicles pulling trailers. United will incorporate accommodation for parking of vehicles with trailers in the parking lot design and construction. United does not endorse having United employees or contractors drive this section of road with large maintenance vehicles on a regular basis once the road is open to public access. Therefore, the first phase does not include provision of toilet facilities that would require the use of large maintenance vehicles. The second phase will incorporate this provisions. United proposes to establish trigger criteria for implementing phase 2 during the CEQA environmental review process. Until phase 2 triggers are met, hikers will have access to restrooms located in United's Lake Piru Recreation Area. In addition, United will improve signage to inform drivers of the hazards of the roadway, and United will explore options for the construction of an improved turn-around at the Juan Fernandez Launch Ramp Facility (on property owned by United), in order to minimize trucks pulling boat trailers from unknowingly proceeding north onto the unimproved portion of Piru Canyon Road.

### ***3.1.1 Phase 1 Activities***

During phase 1, the following activities will be implemented.

- CEQA evaluation
  - Identification of preferred location for trailhead parking lot on United's Lisk Ranch property.
  - Preliminary design of the trailhead parking lot.
    - Identification of number and configuration of parking spaces (to accommodate passenger vehicles, and vehicles with horse trailers).
    - It is anticipated that the parking lot will be approximately 1 acre with pull through spaces for up to 4 vehicles with trailers and equipped with hitching posts for equestrian use, and wildlife deterrent trash receptacles.
    - Identification of signage needs (interpretive signage, no trespassing, and hazard warning).
  - Establishment of trigger criteria (associated with implementation of improvements to Piru Canyon Road) for implementing the activity outlined in phase 2.
- Approval process
  - United will submit proposed preferred location, preliminary design of the trailhead parking lot, and trigger criteria for implementing Phase 2 activity to FERC, Forest Service, and CDPR for review and approval.
- United to execute a permanent trail easement to the United States Government for the purposes of construction, maintenance and public use of the Pothole Trail, and trailhead parking lot, allowing permanent access in perpetuity to adjacent Forest Service lands.
- Final design and construction of the trailhead parking lot.

- Upon completion of construction activities (in coordination with Forest Service trail construction) United will provide open public access through the gate on Piru Canyon Road at Reasoner Canyon (United anticipates that the Forest Service will concurrently provide open public access through the gate on Piru Canyon Road north of the Juan Fernandez Launch Ramp Facility).
- United will maintain the trailhead parking lot facility (trash removal and general maintenance)

### **3.1.2 Phase 2 Activities**

When conditions are such that phase 2 criteria (established during phase 1) is triggered, United will implement the following activity.

- Installation and maintenance of toilet facilities at the Pothole Trail trailhead parking lot facility.

## **4.0 IMPLEMENTATION PROCESS AND SCHEDULE**

United has funded the project's design and environmental review in its current budget. In order to continue to progress toward achieving the intended goals established in article 411 of the license, (in anticipation of FERC approval of this Plan or required modification to this Plan), United has entered into a contract with a consultant to evaluate the proposed trailhead parking lot site; develop a preliminary design; and, in conjunction with the CEQA process, develop engineered drawings and construction cost estimates. The consultant will also provide field and construction management services.

The schedule for implementing Plan activities must correlate with the Forest Service's schedule for companion projects since many elements of this Plan depend on decisions made during the Forest Service's NEPA process. United anticipates performing CEQA for United's activities in tandem with (and following) the Forest Service's NEPA process allowing for results/products of the NEPA evaluation to provide information for the CEQA process and vice versa.

### **4.1 Project Schedule**

The following schedule is developed as a guideline and subject to change pending agency review and approval requirements, and the Forest Service progress on the NEPA process.

United submits Plan to FERC	April 1, 2016
Forest Service initiates NEPA review	Spring 2016
Consultant produces preliminary design	April 29, 2016
FERC issues order approving Plan	June 1, 2016
United initiates CEQA review	June 15, 2016
Consultant supplies engineered drawings of project alternatives and construction cost estimates	July 29, 2016
United Board adopts project construction budget	September 14, 2016
Forest Service completes NEPA review	Early 2017
United Board adopts CEQA findings	March 8, 2017

CEQA findings submitted to FERC, Forest Service, and CDPR for review	March 9, 2017
FERC issues order approving CEQA findings	May 9, 2017
United completes project design	May 15, 2017
County of Ventura approves conditional use permit modification	August 1, 2017
United completes construction permitting	August 15, 2017
United procures construction contract	August 15, 2017
Forest Service initiates construction on companion projects	Summer/fall 2017
United initiates construction (outside of bird nesting period)	September 15, 2017
United completes construction	November 1, 2017
United dedicates facility	November 8, 2017
Facility open to public (pending Forest Service completion of companion projects)	November 9, 2017

## **5.0 FUNDING FOR MAINTENANCE OF PROJECT**

United will maintain the trailhead parking lot as a component of its recreational infrastructure and facilities. The funds necessary to perform maintenance of the District's recreational infrastructure and facilities come from a combination of entrance fees collected at the Lake Piru Recreation Area (currently \$10 off-season and \$13 peak season per vehicle), supplemented by District ad valorem tax. Recreational users accessing the Forest Service trails via the Lake Piru Recreation Area currently pay the entrance fee. United has no plans to eliminate or adjust the fee. The day use entrance fee includes access to, and use of, restroom facilities, potable water sources, trash receptacles, day use picnic facilities, parking lots, and roadways within the Lake Piru Recreation Area.

## **6.0 REPORTING**

United will produce an annual monitoring report at the end of each calendar year. The report will be filed with FERC, the Forest Service and CDPR by January 15 of each year. The report will include the following information.

- Maintenance activities performed at the Pothole Trail trailhead parking lot facility throughout each calendar year.
- Information associated with vandalism or illegal activities that are observed or brought to the attention of United staff during the reporting period.
- Notable observations related to usage and an evaluation of the effectiveness of the facility to meet the intended recreation demands.
- Recommendations for modifications to the facility or facility maintenance if appropriate.

## **7.0 ANNUAL CONSULTATION**

As required by Section 4(e), Condition No. 2 in Appendix A of the FERC license, United staff will annually consult with the Forest Service. The annual monitoring report will be presented as part of this annual consultation. The annual consultation will occur between January 10 and March 15 of each year and will include a status report regarding implementation of this Plan.



United will produce a record of the consultation including any recommendations received from the Forest Service. United will file the consultation record with FERC no later than 60 days following the consultation.

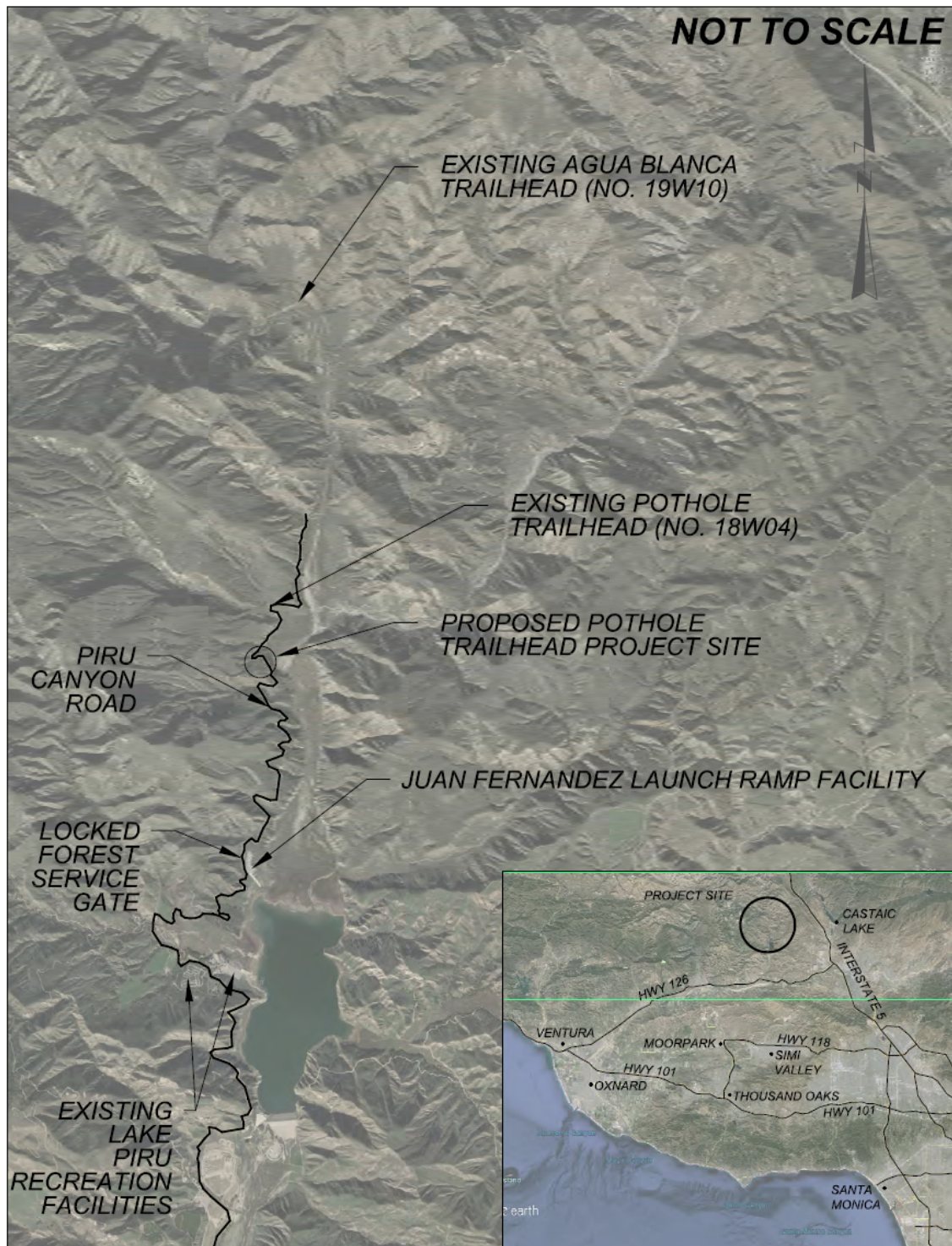


Figure 1 – Vicinity map showing proposed location for Pothole Trail trailhead parking lot project located northwest of Lake Piru.





Figure 2 – Aerial image of United’s Lisk Ranch Property the two proposed site locations for Pothole Trail trailhead parking lot project.

**Appendix A**

**Draft Santa Felicia Project Recreation Trail Plan**

**Dated December 30, 2015**

Santa Felicia Project  
FERC License No. 2153-12

## **Santa Felicia Project – Recreation Trail Plan**

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30 December 2015

**United Water Conservation District**  
106 North 8<sup>th</sup> Street  
Santa Paula, California 93060

## **INTRODUCTION**

United Water Conservation District prepared this Recreation Trail Plan (Plan) to comply with the Santa Felicia Project (Project), Federal Energy Regulatory Commission (FERC) License Number 2153-012, Article 411. The Project is located in eastern Ventura County, approximately 5 miles north of Piru, California, and is owned and operated by United Water Conservation District (United). Article 411 of the license issued by FERC in September 2008 requires that, within five years of license issuance, United file a Plan for providing trail access to the east side of Lake Piru. The FERC license requirements for the Plan requires United to: 1) identify the location of the existing trail sections to be formalized along the east side of the lake; 2) identify the location and route for providing the missing 1.5-mile trail link between Forest Service roads and other existing trails; and 3) provide a schedule for designing and constructing the new trails. After consultation with the United States Department of Agriculture Forest Service (Forest Service) and California Department of Parks and Recreation (Cal. Parks), United is to file the Plan with FERC. The Plan is to contain documentation of the consultation, including copies of comments and specific descriptions of how United has accommodated them.

## **FERC PROJECT AREA**

The Project area consists of all lands within the FERC Project boundary, which generally follows the 1078.3-foot mean sea level contour line around the shore line of Lake Piru, as shown in the Santa Felicia Project Map (attached Exhibit A). However, the Project boundary varies from this contour line in some areas to include project facilities such as the Lower Oak and Oak Lane Campgrounds on the west side of the lake, as well as a whitewater takeout location on Piru Creek at the north end of the lake. In addition, it also varies from the 1078.3-foot contour line to exclude private lands. The existing FERC Project boundary encompasses approximately 1,552 acres of land, of which 174.5 acres is situated within the Los Padres and Angeles National Forests, owned by the Forest Service. Of the Forest Service land, approximately 121 acres is inundated by Lake Piru at the maximum water surface elevation.

## **BACKGROUND AND RESULTS OF CONSULTATION**

Subsequent to FERC's issuance of the license, and during initial consultation with the Forest Service, United confirmed that no Forest Service trails or roadways existed in the Angeles National Forest property to the east of the lake, and that other existing private roadways on the east side of the lake are not open to the public. Because of this, in a submittal dated November 5, 2013, United stated that the Article 411 requirement was not valid and therefore United did not intend to install the required trail link. In a letter dated March 24, 2014, FERC agreed that United provided sound justification for not pursuing the development of the trail link on the east side of Lake Piru; however, FERC found that United's Plan failed to identify alternative strategies for meeting trail needs at

the Project. Furthermore, FERC directed that United consult with the Forest Service, the Cal. Parks and other interested parties to explore alternative hiking opportunities at the Project and to provide a modified plan, or provide justification that no alternative hiking opportunities were feasible. FERC also directed that United's modified Plan include recommended changes to its November 5, 2013 submitted Plan, including a schedule of implementation.

United subsequently resumed consultation with the Forest Service, Cal. Parks, and hiking-related stakeholders regarding alternative hiking opportunities, with a focus upon improving access to the Los Padres National Forest and Angeles National Forest trails north of the Project boundary, as shown in the Santa Felicia Project Vicinity Map with Existing National Forest Trailheads (attached as Exhibit B). That consultation led to a project concept of opening the Forest Service-owned Piru Canyon Road north of United's Juan Fernandez Boat Launch Facility to vehicular traffic and the siting and construction of a trailhead parking lot on the District's Lisk Ranch parcel that would serve the existing National Forest Pothole Trail (No. 18W04) and Agua Blanca Trail (No.19W10), as shown in the Pothole Trail Trailhead Phase 1 Project Vicinity Map (attached as Exhibit C).

On June 10, 2014, United and the Forest Service hosted a site meeting for hiking-related stakeholders and local property owners to visit alternative sites for the proposed trailhead and to receive comments. In general, hiking-related stakeholders were supportive of the Forest Service opening Piru Canyon Road north of the Juan Fernandez Boat Launch Facility, supportive of the conceptual trailhead project, preferred a trailhead closer to the intersection of Piru Canyon Road and Rickenbacker Road on United's Lisk Ranch parcel, and preferred an alternative alignment of the Forest Service's Pothole Trail to lessen its slope. In general, property owners were opposed to opening Piru Canyon Road beyond the Juan Fernandez Boat Launch Facility, out of concern that it would lead to an increase in trespassing and vandalism, with particular concern over trespassing hunters. The Griffin Family, owners of the property immediately to the west of United's Lisk Ranch parcel, were opposed to a trailhead near the intersection of Piru Canyon Road and Rickenbacker Ranch Road, and were strongly opposed to the Forest Service considering a realignment of its Pothole Trail that would come close to their property, out of concern for increased trespassing. Several stakeholders were concerned about the poor condition of the Forest Service's Piru Canyon Road north of United's Juan Fernandez Boat Launch Facility. United and the Forest Service received and considered the comments.

Since receiving the stakeholder comments in June 2014, United and the Forest Service have worked to jointly develop a Pothole Trail Trailhead Project and a companion Pothole Trail Repairs Project that improve access to the hiking opportunities in the Los Padres and Angeles National Forests via the Pothole Trail, the Agua Blanca Trail and along middle Piru Creek, and that addresses concerns expressed by stakeholders. The

Forest Service has recently completed its Pothole Trail Alignment Alternatives Study, and intends to initiate the environmental review process in the very near future, and to construct the improved trail in 2016 and 2017, if funding becomes available. United's proposed trailhead project will complement the Forest Service's project.

Of particular concern to United is the narrowness and poor condition of the Forest Service's Piru Canyon Road between United's Juan Fernandez Boat Launch Facility and the proposed location of the Pothole Trail Trailhead, especially with respect to trucks pulling horse trailers and trucks pulling boat trailers. United is concerned that when the Forest Service opens the unimproved portion of Piru Canyon Road to the public, that doing so will result in an increased risk to visitors to United's Recreation Area that are unfamiliar with unimproved forest roads and their associated hazards. The Forest Service agrees that this section of roadway presents hazards to drivers, but has been unable to secure the significant amount of funding to improve the roadway. United will support the Forest Service's continuing efforts to seek funding to improve the roadway. In the short term, United and the Forest Service will work to improve signage to inform drivers of the hazards of the roadway, and United will explore options for the construction of an improved turn-around at the Juan Fernandez Boat Launch Facility, in order to minimize trucks pulling boat trailers from unknowingly proceeding north onto the unimproved portion of Piru Canyon Road and having no place to safely turn around. Initially, the first phase of the proposed trailhead project will not provide parking for trucks pulling horse trailers, due to the condition of the roadway. If the roadway can be improved in the future, then United will consider expanding the trailhead to include parking for trucks pulling horse trailers.

In order to minimize potential trespassing on private properties, United and the Forest Service will inspect, repair and replace no trespassing signs, install fences along roadways, where needed, install a Forest Service gate on Piru Canyon Road just north of the proposed trailhead parking lot, and will site the trailhead on its Lisk Ranch parcel as far away from the neighboring properties as possible.

The following modified recreational trails plan improves access for hikers to the existing National Forest trails north of the lake, compliments a project being undertaken by the Forest Service to improve one of its trails, and incorporates comments received from hiking stakeholders and neighboring landowners.

### **ALTERNATIVE RECREATION TRAIL NORTHWEST OF LAKE PIRU**

The public comments FERC received on United's November 5, 2013 initial Recreation Trail Plan focused on enhanced trail access on the northwest end of Lake Piru, specifically related to two existing National Forest trails outside of the Project boundary: Pothole Trail (No. 18W04) and Agua Blanca Trail (No.19W10). Accessing these two trails requires driving through United's Lake Piru Recreation Area, parking at the Juan



Fernandez boat launch area, walking past a locked Forest Service vehicle gate and hiking along the Forest Service-owned Piru Canyon Road across Forest Service property, and across United's Lisk Ranch Property at the north end of the lake to the current Pothole Trail trailhead. The previously mentioned Forest Service locked vehicle gate near where the United's Lake Piru Recreation Area ends (adjacent to Juan Fernandez Boat Launch Facility) prevents vehicle access, except by individuals authorized by the Forest Service (United employees, private landowners, state and federal agencies and consultants thereof). Currently, the public is only able to gain access beyond the gate on foot or by non-motorized bicycle. It is approximately 3 miles from the locked Forest Service vehicle gate to the Pothole Trail trailhead. The Aqua Blanca Trail trailhead is several miles further north in Piru Canyon, near the former Forest Service Blue Point Campground. The Forest Service cites public health and safety as the primary reason for preventing vehicle access past its locked vehicle gate. The limited width of the roadway does not allow for safe roadside parking or easy vehicle turn-arounds.

The federal 2015-2016 budget provided funding to initiate a project to repair and improve the existing Pothole Trail. The Forest Service's consultant has recently completed the trail alignment alternatives study. The alternatives contained in the report line-up well with United's proposed location for a trailhead on its Lisk Ranch parcel. The Forest Service intends to initiate the environmental review process for the project in early 2016, in compliance with the National Environmental Policy Act, followed by final design in mid-2016. If funding is available, the Forest Service intends to construct the trail improvements during the federal 2016-2017 fiscal year. It is United's understanding that the Forest Service intends to re-route the alignment of the Pothole Trail, as portions of the existing trail are very steep, and do not meet the Forest Service's trail design standards. It is also United's understanding that the Forest Service intends to design its trail improvements to avoid private properties.

Based on United's understanding of Forest Service plans to improve the Pothole and Agua Blanca Trails and the comments FERC received from various organizations (referenced in FERC's letter to United, dated March 24, 2014), United will focus its efforts on enhancing access to the Forest Service trails on the northwest side of Lake Piru. To complement the Forest Service plans to enhance the Pothole and Agua Blanca Trails, United will construct an initial trailhead parking lot on an approximately 1 acre site to accommodate off-roadway vehicles parking and interpretive signage to serve both the Pothole and Agua Blanca trails. The trailhead parking lot design and specifications will be prepared in consultation with the Forest Service. In the future, if the Forest Service is able to secure funding to improve Piru Canyon Road so that it is safe for trucks pulling trailers, then United may expand the parking lot to include up to four pull-through spaces for horse trailers and hitching rails for horses.

With the completion of the trailhead parking lot, vehicles will be able to park away from the narrow road, thereby minimizing the potential of roadway hazards caused by vehicles parking on the roadway. When United completes the construction of the trailhead parking lot, the Forest Service has indicated that it plans to eliminate the locked vehicle gate near the Juan Fernandez boat launch area, as previously mentioned. This will allow 24-hour vehicle access to the Pothole and Aqua Blanca Trails trailhead parking lot. Due to its remote location and potential for vandalism, the trailhead parking lot will not include trash receptacles or toilet facilities. Hikers will have access to trash receptacles and restrooms located in United's Lake Piru Recreation Area further south along Piru Canyon Road. No camping or campfires will be allowed at the trailhead parking lot or on any United-owned lands outside of the Lake Piru Recreation Area.

In consultation with the Forest Service, United identified several potential locations for a trailhead parking lot. Selection factors considered were size (large enough to accommodate several passenger vehicles and trucks, and trucks with horse trailers), grade, terrain, existing vegetation, proximity to the Forest Service roadway, potential for flood inundation and proximity to the existing and realigned Pothole Trail. The initial preferred site, located adjacent to the Forest Service's Piru Canyon Road, at the entrance to the private Rickenbacker Ranch Road, provides ample space to accommodate parking for several passenger vehicles and horse trailer parking and turn-around, is only moderately sloped, is not subject to regular flood inundation, and is proximate to the Pothole Trail. After considering the input of the private property owner west of United's Lisk Ranch parcel, United plans to site the trailhead on the old Lisk homestead site, to the north of Rickenbacker Ranch Road, in order to minimize the likelihood of trespassing on the neighbor's property, as shown in the Pothole Trail Trailhead Phase 1 Project Site Map (attached as Exhibit D). This site also meets the site selection criteria.

United has funded the project's design and environmental review in its current budget, expects to have a design firm under contract within the next month, and plans to initiate environmental review in early 2016, in compliance with the California Environmental Quality Act. United plans to seek funding for the construction of the trailhead parking lot and associated improvements in its Fiscal Year 2016-2017 budget, and to complete construction by mid-2017, as per the Pothole Trail Trailhead Phase 1 Project Schedule (attached as Exhibit E).

United will maintain the trailhead parking lot as a component of its recreational infrastructure and facilities. The funds necessary to perform maintenance of the District's recreational infrastructure and facilities come from a combination of entrance fees collected at the Lake Piru Recreation Area (currently \$10 off-season and \$13 peak season per vehicle), supplemented by District ad valorem tax. Hikers accessing the Forest Service trails via the Lake Piru Recreation Area currently pay the entrance fee. United has no plans to eliminate or adjust the fee. The day use entrance fee includes

access to, and use of, restroom facilities, potable water sources, trash receptacles, day use picnic facilities, parking lots, and roadways within the Lake Piru Recreation Area.

## **CONSULTATION**

Article 411 requires that United enter into consultation with the Forest Service and the Cal. Parks regarding the Recreation Trail Plan. The plan must include documentation of the consultation, copies of comments and specific descriptions of how the comments have been accommodated.

Comments submitted to FERC in response to United's Recreation Trail Plan dated November 5, 2013 include the two letters (attached as Exhibits F and G) cited by FERC in its March 24, 2014 letter to United, which requested improved vehicle access to existing Forest Service trails (Pothole Trail, Agua Blanca Trail) through the Forest Service locked vehicle gate on Piru Canyon Road adjacent to United's Juan Fernandez Boat Launch Facility, provision of a trailhead parking lot for the existing trails, reduction or elimination of United's day use entrance fee, and establishment of a maintenance fund.

This revised Recreation Trail Plan provides for vehicle access and trailhead parking consistent with the provided comments, although vehicle access through the Forest Service gate is the responsibility of the Forest Service. United disagrees with the elimination or reduction of the day use fee applied to individuals entering the Lake Piru Recreation Area to access Forest Service trails. The nominal fee is necessary to off-set maintenance of the United-owned portions of Piru Canyon Road (entrance gate to Juan Fernandez Boat Launch Facility), the proposed trailhead parking lot, and hikers' use of day use facilities in the Lake Piru Recreation Area. It is not practical or feasible for United or its Lake Piru Recreation Area concessionaire to track visitors passing through the Recreation Area entrance gate who intend only to hike on Forest Service trails and not use the recreation area facilities, nor to attempt to exclude them from such use. The recreation area day use facilities will be available to hikers. Additionally, United sees no need to set up a separate "maintenance" fund for the trailhead parking lot. United will assume responsibility for maintenance and will include funds to cover necessary expenditures as a part of its annual budget process. United provides several opportunities for the public to comment on its annual proposed budget.

On June 12, 2014, United held a field meeting to discuss the location of the trailhead parking lot, amenities and other matters regarding United's Trail Plan obligation. United sent a notice of the meeting (attached as Exhibit H) to all individuals and organizations that submitted comments to FERC on United's original Trail Plan (dated November 5, 2013), as well as to other interested members of the public. Additionally, United also notified the owners of private properties adjacent to the Lake Piru Recreation Area and the Pothole and Aqua Blanca trails, as well as the Forest Service. Twenty-four individuals indicated interest in attending and seventeen attended, along with two Forest

Service representatives and three United employees, as per the attendance sheet (attached as Exhibit I). The attendees had the opportunity to view and discuss the potential trailhead parking lot sites; potential trailhead parking lot amenities and amenities within the Lake Piru Recreation Area; Forest Service plans to connect the trailhead parking lot to the Pothole Trail; Forest Service plans to relocate the locked vehicle gate adjacent to Juan Fernandez boat launch area to a location beyond the trailhead parking lot to be constructed by United, thereby providing 24-hour vehicle access to the Pothole and Aqua Blanca trailhead parking lot; means to reduce vandalism; and means to reduce trespassing on adjacent private properties.

At the meeting, United received comments and requests from attendees on the following matters: the selection of the trailhead parking lot site, unencumbered vehicle access through the Forest Service vehicle gate near the Juan Fernandez boat launch area, vehicle access to private properties further north on Piru Canyon Road, a locking vehicle gate at the entrance of the trailhead parking lot to be locked each evening to prevent overnight access, route changes to the Pothole Trail and prevention of access to the former Forest Service Blue Point Campground (currently being decommissioned). United also received one request for an interpretive trail adjacent to the parking lot. Staffs from United and the Forest Service addressed the site selection criteria and Forest Service staff explained plans to relocate the Forest Service gate to a location beyond the trailhead parking lot to provide 24-hour vehicle access to the trail but prevent vehicle access to private properties. Further questions about the Forest Service gate were referred to Forest Service staff, as were questions regarding Blue Point Campground and potential changes to the Pothole Trail route. United does not plan to construct an interpretive trail due to limited space, proximity to adjacent private property and the more than sufficient availability to two existing hiking trails. Interpretive signage will be posted at the trailhead parking lot. In response to concerns expressed by the owners of a private property adjacent to the future trailhead parking lot to be constructed by United, United will install a locking gate to prevent vehicles in the trailhead parking lot from proceeding west on Rickenbacker Ranch Road toward the private property. Only United, authorized public safety agencies and the private property owner will have gate access.

This Plan will be posted on the United's website for review and comment by all interested parties. The review period will be 30 days. United will notify all attendees of the June 12, 2014 meeting, as well as all organizations and individuals who provided comments to FERC regarding United's November 5, 2013 Plan of the posting. Additionally, as required by Article 411 of United's FERC license, United will provide the Forest Service and Cal. Parks a copy of the revised Recreation Trail Plan for review and comment. All comments received during the review period will be addressed and incorporated into the final plan prior to submittal to FERC.

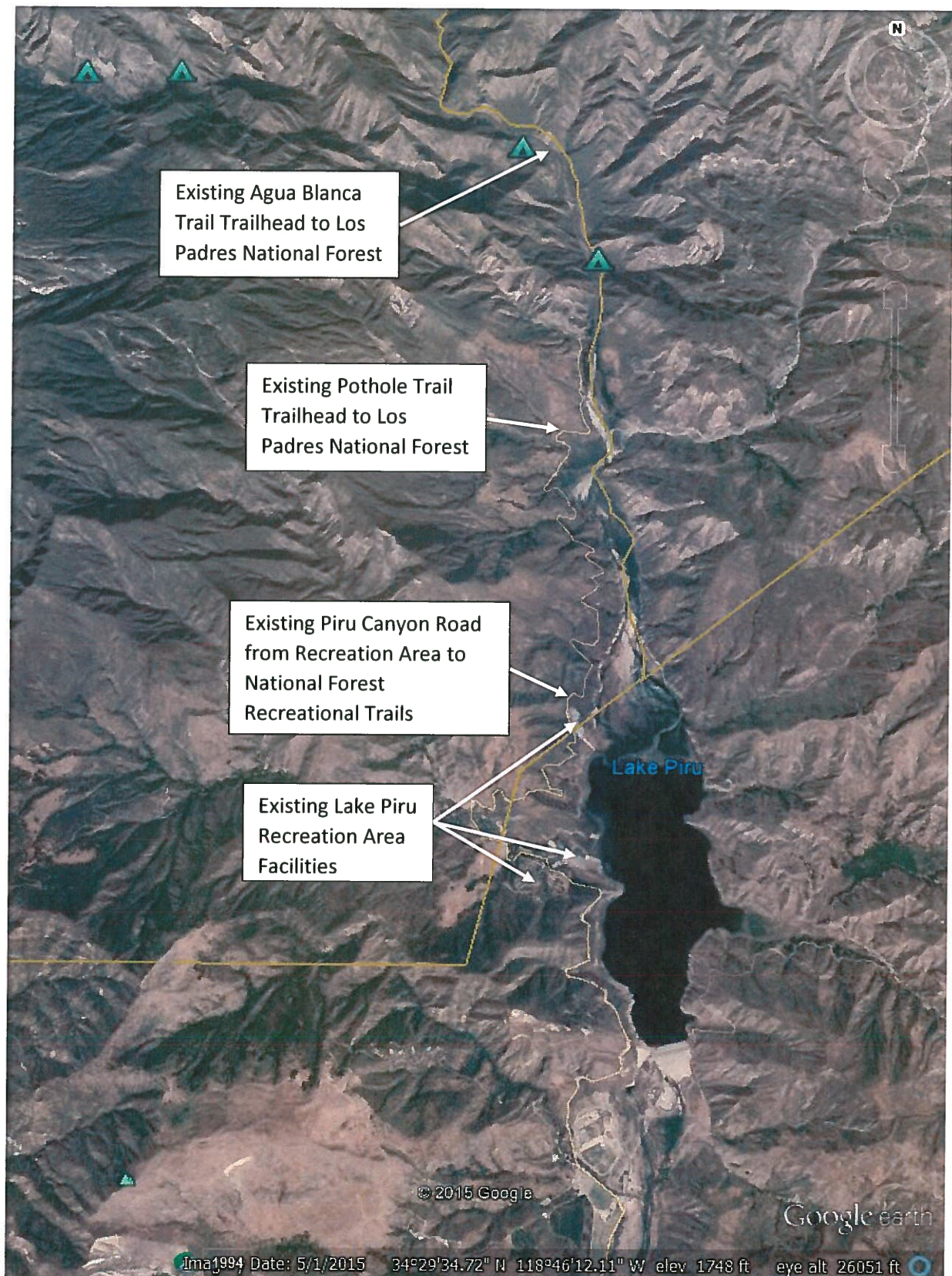
Exhibits:

- A – Santa Felicia Project Map
- B – Santa Felicia Project Vicinity Map with Existing Forest Service Trailheads
- C – Pothole Trail Trailhead Phase 1 Project Vicinity Map
- D – Pothole Trail Trailhead Phase 1 Project Site Map
- E – Pothole Trail Trailhead Phase 1 Project Schedule
- F – Comment Letter 31 Dec 2013 from Craig Carey
- G – Comment Letter 14 Aug 2013 from Multiple Environmental Interest Orgs.
- H – Notice of June 12, 2014 Trail Meeting
- I – June 12, 2014 Trail Project Site Meeting Attendance Sheet

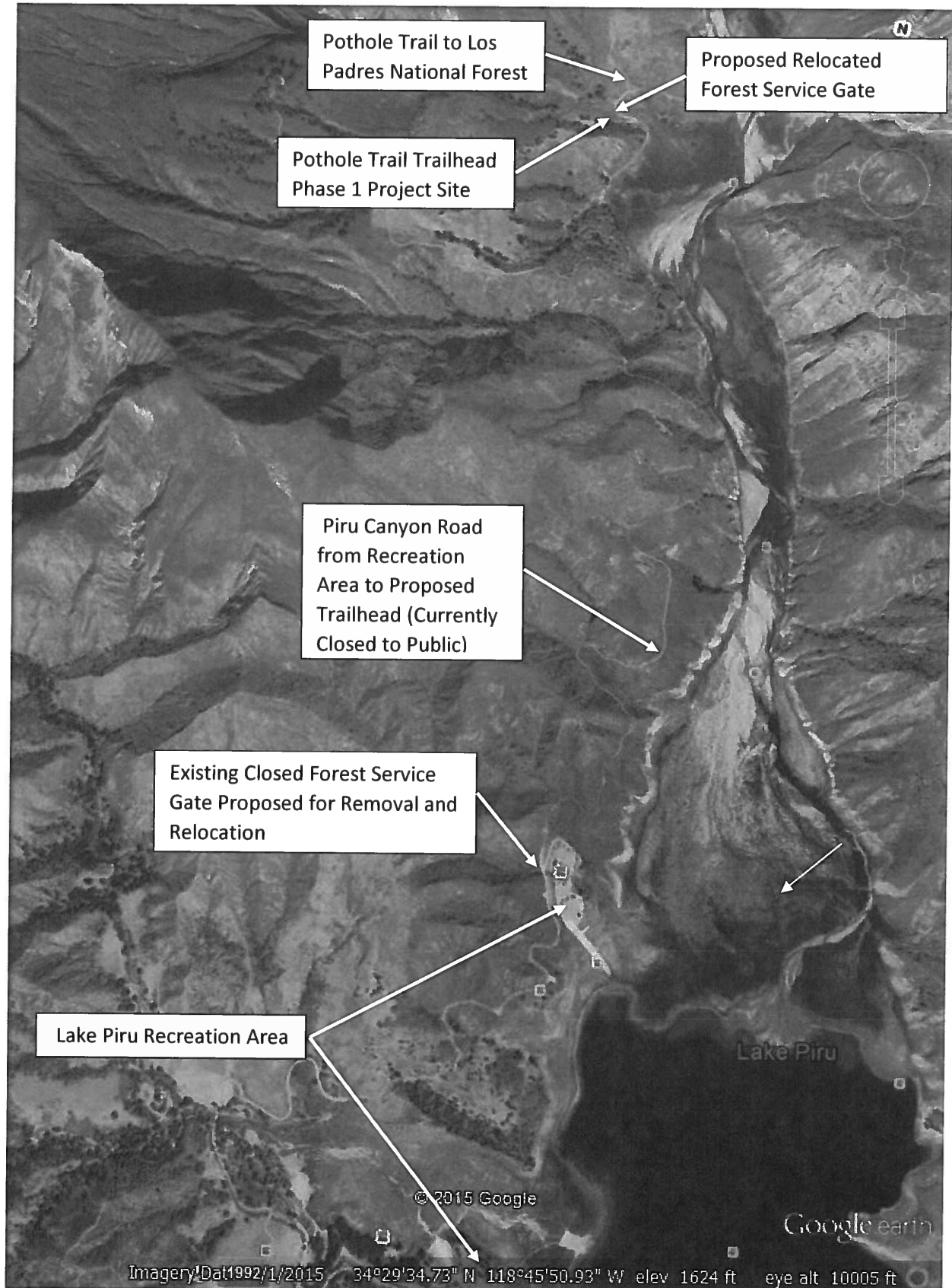




# Santa Felicia Project Vicinity Map with National Forest Trailheads

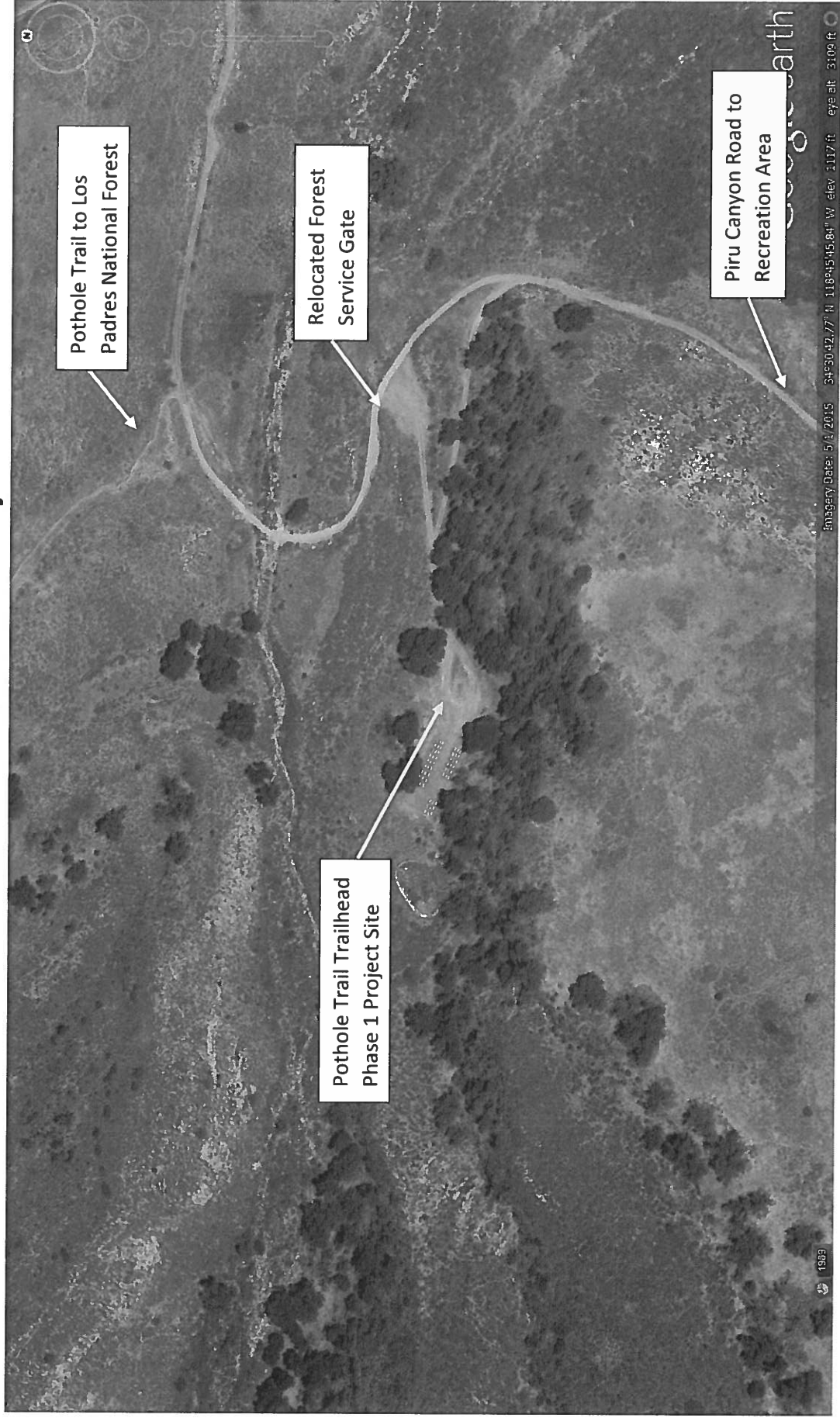


## Pothole Trail Trailhead Phase 1 Project Vicinity Map





## Pothole Trail Trailhead Phase 1 Project Site



## Pothole Trail Trailhead Phase 1 Project Schedule

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Revised 30 Dec 2015

United Board Approves Project Concept & Allocates Funding	12 Nov 2015
United Submits Final Draft Revised Plan to FERC	31 Dec 2015
Public and Agencies Submit Comments on Revised Plan	31 Jan 2016
United Submits Final Revised Recreational Trails Plan to FERC	29 Feb 2016
FERC Approves Revised Recreational Plan	30 Apr 2016
United Board Adopts Project Construction Budget	08 Jun 2016
United Completes Project Design	15 Jul 2016
United Board Makes CEQA Findings	14 Dec 2016
County Of Ventura Approves Conditional Use Permit Mods.	31 Dec 2016
United Completes Construction Permitting	31 Dec 2016
United Procures Construction Contract	31 Jan 2017
United Commences Construction	15 Feb 2017
United Completes Construction	01 Apr 2017
United Dedicates Facility	12 Apr 2017
Facility Open to Public	13 Apr 2017

Craig R. Carey, Santa Barbara, CA.

We respectfully disagree with United's contention they needn't prepare a recreation management plan as it pertains to trail building, esp. as it is required per Article 411 of their license.

We agree with State Parks' and US Forest Service's assessment the east side of Lake Piru is not practical for trail-building (they had 5 years to make that assessment), but ask FERC leverage their right to require changes to the plan, and address the access issues to adjacent public lands on the \*west\* side of the lake – particularly the Potholes and Agua Blanca trails in the Sespe Wilderness – currently inhibited by UWCD's prohibitive entrance fees.

Any plan should make allowance for vehicular access, facilities, and a proper parking area for west side hikers.

As it currently stands, after paying the costly entrance fee, Forest-goers can only drive 2.3 miles toward Forest lands and are required to hike or cycle an additional 3 miles from the Juan Fernandez Boat Launch to the nearest USFS trailhead (via a Forest road closed to the public yet maintained with public funds). When the Fernandez parking area is closed during the off-season or low water levels, access requires an additional 1.5 miles from the Reasoner Canyon parking area.

We further expect a revised plan to include a detailed budget and timeline for future trailhead, trail, and parking area maintenance expenses. The plan should also discuss the installation of interpretive kiosks and other signage at trailheads and at key points along trails.

I'd be more than happy to discuss further; feel free to phone 805 617 4610 x3.  
Cheers and Happy New Year!

Document Content(s)

20392.TXT.....1-1

California Trout ■ Condor Trail Association  
 Friends of the River ■ Friends of the Santa Clara River  
 Keep the Sespe Wild Committee ■ Los Padres Forest Association  
 Los Padres ForestWatch ■ Santa Clara River Watershed Conservancy  
 Sierra Club Angeles Chapter ■ Sierra Club Los Padres Chapter

14 August 2013

The Honorable Kimberly D. Bose, Secretary  
 Federal Energy Regulatory Commission  
 888 First Street NE  
 Washington DC 20426

RE: United Water's Request for Extension of Time to Prepare its Recreation Trail Plan for FERC License No. 2153-012

Dear Secretary Bose:

We have received United Water Conservation District's letter re: the FERC No. 2153-12 extension request dated 24 July 2013. We do not oppose this one extension to give United Water additional time to consult with stakeholders, but ask that the following organizations receive notice of the draft plan along with a minimum 30-day review and comment period:

- American Whitewater, Attn: Dave Steindorf
- California Trout, Attn: Kurt Zimmerman
- Condor Trail Association; Attn: Bryan Conant
- Friends of the River: Attn: Steve Evans
- Friends of Santa Clara River, Attn: Ron Bottorff
- Keep the Sespe Wild Committee, Attn: Alasdair Coyne
- Los Padres Forest Association, Attn: Bryan Conant
- Los Padres ForestWatch, Attn: Craig R. Carey
- Santa Clara River Watershed Conservancy, Attn: Dianne Erskine-Hellrigel
- Sierra Club (Angeles Chapter), Attn: Alan Coles
- Sierra Club (Los Padres Chapter), Attn: Jim Hines

The project area is adjacent to the Los Padres National Forest, yet the public has experienced a gradual decrease in public access opportunities in this area. Among our concerns are trail access to adjacent public lands (particularly the Potholes and Agua Blanca trails in the Sespe Wilderness) as well as the schedule for implementing and completing trail construction.

We look forward to submitting detailed comments on the plan, but also wish to outline some preliminary issues we want to see addressed.

**Entrance Fee.**

United Water currently requires the public to purchase a \$10-13 daily pass to access national forest lands. This fee is excessive and prohibitive for those who simply wish to park their vehicle and hike adjacent lands (see "Trailhead Access and Parking," below), particularly for excursions lasting multiple days. A \$5 fee comparable to the Adventure Pass should suffice, *if any fee at all is levied*.

**Trailhead Access and Parking.**

Any plan should make allowance for vehicular access, facilities, and a proper parking area for the Pothole (18W04) trailhead and reasonable accommodation for other west side (Agua Blanca- and Piru Creek-bound)

hikers. These trailheads represent the southern terminus of the proposed Condor Trail, and public access is crucial.

As it currently stands, after paying the costly entrance fee, Forest-goers can only drive 2.3 miles toward Forest lands and are required to hike or cycle an additional 3 miles from the Juan Fernandez Boat Launch to the nearest USFS trailhead (via a Forest road closed to the public yet maintained with public funds). When the Fernandez parking area is closed during the off-season or low water levels, access requires an additional 1.5 miles from the Reasoner Canyon parking area.

#### **Maintenance Fund.**

We expect the plan to include a detailed budget and timeline for future trailhead, trail and parking area maintenance expenses. The plan should also discuss the installation of interpretive kiosks and other signage at trailheads and at key points along trails.

We look forward to receiving UWCD's draft plan and to contributing insight toward a solution all stakeholders will find mutually beneficial.

Thanks for your time and consideration,

/sigs

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kzimmerman@caltrout.org

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Ron Bottorff  
Friends of the Santa Clara River  
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bottorffm@verizon.net

Alasdair Coyne  
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Dianne Erskine-Hellrigel  
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Conservancy  
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zuliebear@aol.com

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Los Angeles CA 90010  
colesalanr@gmail.com

Jim Hines  
Sierra Club Los Padres Chapter  
PO Box 31241  
Santa Barbara CA 93130  
jhcasitas@gmail.com

cc: Mike Solomon, UWCD  
Sue Exline, USFS

**UNITED WATER CONSERVATION DISTRICT  
TRAIL MEETING**

**JUNE 10, 2014, 4:00 P.M. AT LAKE PIRU**

United Water Conservation District will hold a meeting to discuss options for improved access to United States Forest Service (USFS) trails above the north end of Lake Piru.

This is a field meeting scheduled for June 10, 2014 at 4:00 p.m. We will gather at the Juan Fernandez boat launch area at Lake Piru (see map on back). From there we will carpool to the proposed Potholes trailhead location. Please be on time since we will be passing through a couple of locked gates.

We suggest you dress appropriately in hiking attire (sturdy shoes) and bring water. You may be asked to register at the front gate kiosk for insurance reasons, but you will not be required to pay the entrance fee.

In order to assist us prepare for this meeting, please RSVP to Mary Kanatzar at [maryk@unitedwater.org](mailto:maryk@unitedwater.org) or 805-525-4431 by June 8.

**4780 Piru Canyon Road, Piru CA**

[illegible]



## **Appendix B**

### **List of Stakeholders**

**Santa Felicia Project Recreation Trail Plan Distribution List**

Ventura County Supervisor Kathy Long, 800 S Victoria Avenue L#1880, Ventura, CA 93009

Mr. Charles Jones, 116 Eaton Street, Oceanside, CA 92054

Ranger Charlie Robinson, USFS Ojai Ranger District, 1190 E Ojai Avenue, Ojai, CA 93023

Ms. Lucinda Walsh, Dominguez Canyon, P O Box 484, Piru, CA 93040

Mr. and Mrs. Fred (Elinor) Olivas, 1488 Eucalyptus Street, Carpinteria, CA 93013

Ms. Jean Wren Davidson, 2295 Riverview Street, Eugene, OR 97403

Mr. Chacho Dominguez, Dominguez Canyon Ranch, P O Box 54, Piru, CA 93040

Mr. Alan Coles, Sierra Club Angeles Chapter, 3435 Wilshire Blvd. #660, Los Angeles, CA 90010

Ms. Dianne Erskine-Hellrigel, Santa Clara River Watershed, 24820 Fourl Road, Newhall, CA 91321

Mr. Jim Hines, Sierra Club Los PadresChapter, P O Box 831, Santa Barbara, CA 93130

District Ranger Susan Exline, U.S. Dept. of Agriculture - Forest Service, 1190 E Ojai Road, Ojai, CA 93023

The Honorable Julia Brownley, US Congresswoman 26thDistrict, 300 E Esplanade Drive Suite 470, Oxnard, CA 93036

Mr. John Davidson, P O Box 44, Dundee, OR 97115

Ms. Martha Goodrich, 421 6<sup>th</sup> Street, Dayton, OR 97114

Mr. Tim Cohen, Ranchco Temescal, P O Box 378, Piru, CA 93040

The King Family, King Ranch, P O Box 936, Tulare, CA 93275

Mr. Darrell Cochran, Layman Ranch, P O Box 372, Piru, CA 93040

Mr. and Mrs. Jim Herbert, Rodeo Flat, 572 Ojai Street, Fillmore, CA 93015

Mr. Greg Pope, U.S. Geological Survey, 3130 Skyway Drive Suite 602, Santa Maria, CA 93455

Mr. Bryan Conant, Condor Trail Association, 178 La Patera, Goleta, CA 93117

Mr. Bill Walling, Cantan Canyon Ranch, 7934 Satuma Avenue, Sun Valley, CA 91352

Director Lisa Magnat, CA State Parks, P O Box 942869, Sacramento, CA 94296

Mr. Sayre Macneil, Agua Blanca Ranch, 1331 Santa Barbara St. Suite 17, Santa Barbara, CA 93013

Ms. Candice Meneghin, California Trout, 701 E Santa Clara Street, Ventura, CA 93001

Mr. David Steindorf, California Stewardship Director, American Whitewater, 4 Baroni Drive, Chico, CA 95928

Mr. Jeff Kuyper, Los Padres Forest Watch, P O Box 831, Santa Barbara, CA 93102

Mr. Joseph Richie, Piru Canyon Ranch, 3117 Saddleback Court, Thousand Oaks, CA 91360

Mr. and Mrs. Jack (Marilyn) Griffin, Reichenbach, P O Box 386, Fillmore, CA 93016

Mr. Bryan Conant, Los Padres Forest Association, 6755 Hollister Avenue Suite 150, Goleta, CA 93117

Mr. Ron Buttorf, Friends of the Santa Clara River, 660 Randy Drive, Newbury Park, CA 91320

Mr. Eric Wesselman, Friends of the River, 1418 20<sup>th</sup> Street Suite 100, Sacramento, CA 95811

Mr. Zachary Likins, County of Los Angeles-Dept Parks & Rec-Trails Section, 510 S Vermont Avenue, Los Angeles, CA 90020

Mr. Alasdair Coyne, Keep the Sespe Wild, P O Box 715, Ojai, CA 91320

Ms. Laura Hocking, Ventura County Watershed Protection Agency – Planning & Regulatory Division, 800 South Victoria, Ventura, CA 93009

Ms. Zia Hosseinipour, Ventura County Watershed Protection Agency – Planning & Regulatory Division, 800 South Victoria, Ventura, CA 93009

Ms. Whitney Wilkinson, County of Ventura - Resource Management Agency – Planning Division, 800 South Victoria, Ventura, CA 93009

## **Appendix C**

### **Comments Received from Agencies and Stakeholders and United's Response to these Comments**

**Santa Felicia Project**  
**Recreation Trail Plan - Stakeholder Comment Review**

Item #	Stakeholder	Stakeholder Comments	UWCD Responses & Actions
1	Jack & Marilyn Griffin	1. The stakeholders requested an emailed copy of United Water Conservation District's (United's) FERC License for the Santa Felicia Project	An electronic copy of the license was emailed to jacmargrif@cseway.com on March 30, 2016.
2	Jack & Marilyn Griffin	2. The stakeholders requested that United provide them with a list of all of the named and identified stakeholders and stakeholder agencies involved in the review process of the District's Recreation Trail Plan.	A list of the stakeholders was emailed to jacmargrif@cseway.com on March 30, 2016.
3	Jack & Marilyn Griffin	3. The stakeholders expressed concern that new trails in and around their property would increase hunting access on their private property and likely result in an increase of poaching activity in the area.	Comment noted and included in text of Plan. An assessment of impacts, including impacts to neighboring landowners will be included in the CEQA process. United recommends that stakeholders consult with the appropriate law enforcement
4	Jack & Marilyn Griffin	4. The stakeholders note that they possess photographic evidence of "poachers & trespassers" and will make that evidence available upon request to support their claims and concerns.	Comment noted.
5	Jack & Marilyn Griffin	5. Lodges and/or clubs in the area charge fees or work time in exchange for keys to locked gates. This activity allows participants easier access to public lands than the general public. If the intent is to allow hunters and hikers easier access to trails and public lands then all gates should be removed (not including gates to private land or United's land). The proposed parking lot and new gate will end near the Pothole trailhead but will not be near the Aqua Blanca trail. The Aqua Blanca trail allows easier access to the Pothole, and more public land. The stakeholder recommends that if some gates on Lake Piru Road are removed, that all gates should be removed, and concludes with a speculation that hunting pressure and poaching will increase, more animals will be killed, and litter will proliferate. These factors are an issue that all interested parties should be made aware.	Comments noted. United only has discretion over gates on United property. United recommends that stakeholders consult with the Forest Service for issues associated with access and gates located on Forest Service lands and the appropriate law enforcement agency for issues associated to illegal activities.
6	Jack & Marilyn Griffin	6. The stakeholders note that improving access to lands will provide poachers better access to wildlife sanctuaries on both public and private lands.	Comments noted.
7	Jack & Marilyn Griffin	7. The stakeholders note that two trails already exist in the Pothole area and the use of public funds for new trails is a waste of taxpayer's money. Further, if agencies and other stakeholders wish to increase trail access, all gates including the one at the former Blue Point campground should be removed.	Comments noted.
8	Jack & Marilyn Griffin	8. The stakeholders reference the following statement from page 2 of the draft trail plan "United confirmed that no Forest Service trails or roadways existed in the Angeles National Forest property to the east of the lake" and add a statement that public lands exist in this area and that this area might be a good place to put a trail.	Comments noted.
9	Jack & Marilyn Griffin	9. The stakeholders have noted that they believe there is insufficient "No Trespassing" signs to the west, south, and east of the Griffin property. The stakeholders note that "vandals" have removed most of the signage along the perimeter of United's property.	United will assess the stakeholders concerns and, if necessary, replace missing signs on United's property. No trespassing signs on United's property are intended to prevent unauthorized access to United's property, and United is not responsible for posting no trespassing signs on private property.
10	Jack & Marilyn Griffin	10. The stakeholders have expressed concerns that existing signage on the District's Lisk Ranch at or near the intersection of Richenbach Road and Piru Canyon Road is nebulous and has resulted in increased trespassing on their property. The Stakeholders have recommended that the District change all signage on District lands to simply state "No Trespassing."	Comment noted. United will take this under advisement.
11	Jack & Marilyn Griffin	11. The stakeholders have noted that access to their property, the Griffin Property, is strictly limited to family, law enforcement and fire crews and that they do not sell access to or provide hunting rights on their land.	Comments noted.
12	Jack & Marilyn Griffin	12. The stakeholders contend that the District's claims that the Pothole Trail is steep and unsustainable are false and contradicts statements made by previous employees of United. The stakeholders have noted that it is their recommendation that modifications be made to the existing Pothole Trail to make it more sustainable or to consider improving access to the Blue Point campground and the Agua Blanca Trail, which they believe to be a more appropriate alternative.	Comments noted. The Forest Service has discretion and jurisdiction with relation to decisions regarding trail alignment. The Forest Service is conducting a NEPA environmental assessment process which includes opportunity for stakeholder input.

**Santa Felicia Project**  
**Recreation Trail Plan - Stakeholder Comment Review**

Item #	Stakeholder	Stakeholder Comments	UWCD Responses & Actions
13	Jack & Marilyn Griffin	13. The stakeholders have noted that on page six of United's Trail Plan it states "...Is not subject to regular flood inundation..." and have questioned when the area was last flooded. The stakeholders have also noted that they believe the proposed trailhead location is the second or third best location and they believe the Agua Blanca Trail near the Blue Point campground to be the best location.	Comments noted. United only has discretion of activities conducted on United owned property. United will conduct an environmental assessment to evaluate alternative locations for the trailhead parking lot on United's Lisk Ranch property. The environmental review will include an assessment of potential for
14	Jack & Marilyn Griffin	14. The stakeholders note a concern that open public access will result in the potential for overnight camping in the trailhead parking lot or along Piru canyon Road and ask if tovernight parking will be allowed.	United intends to evaluate the need for signage and locking gates during specific hours during the CEQA process and in consultation with the Forest Service.
15	Jack & Marilyn Griffin	15. The stakeholders ask if United intends for the maintenance at the parking lot to include trash and fecal matter removal since no trash bins or toilet facilities are proposed and suggest that reopening Bluepoint campground might be a better choice.	United reivsed the Plan to include a phased approach to including provisions for trash and toilet facilities.
16	Jack & Marilyn Griffin	16. The stakeholders have noted that while United should be commended on the new gates to be installed at the trailhead parking lot to prevent traffic from traveling west on Richenbach Road, they do have concerns about the stability of those gates as they have experienced vandalism and unauthorized access to their property as a result of the existing gate not being robust enough. The stakeholders have also asked to be provided with the location of all new gates and requested that any new gates be designed to be more resilient to vandalism.	The need for signage and gates will be assessed during the CEQA process. It is United's intent that the existing gate at the intersection of Richenbach Road and Piru Canyon Road will continue to remain locked.
17	Jack & Marilyn Griffin	17. The stakeholders have recommended that the District install "No Parking" signs along Piru Canyon Road, specifically near the intersection of Richenbach Road, as they anticipate increased access will result in patrons parking in areas not designated as parking areas along Piru Canyon Road.	The portion of Piru Canyon Road that is the focus of the comment is on Forest Service Land and not within the discretion of United. However, United will evaluate these concerns and, to the extent feasible, install "No Trespassing" signs on United property
18	Jeff Kuyper, Los Padres Forest Watch et. al	1. Regarding United's statement in the Draft Plan that the Forest Service has completed a Trail Alignment Alternatives Study, this statement is incorrect. For this reason, discussion related to a permanent location for the trailhead or realignment is premature and should be the result of an environemtal review process. The comment includes a suggestion to incorporate an interum location pending the Forest Services NEPA Review.	The Plan has been revised to reflect that the Forest Service is in the process of evaluating two corridors for reestablishing the Pothole Trail that the Forest Service intends to initiate the NEPA process in Spring of 2016. The decision regarding relocation of the trailhead or realignment of the trail will be made by the Forest Service following the NEPA assessment. In addition, the Plan has been revised with the inclusion of United's CEQA process to identify the location, and establish design criteria for the trailhead parking lot facility. An interum location is not feasible because it would be subject to the same environemtnal assessment and
19	Jeff Kuyper, Los Padres Forest Watch et. al	2. The stakeholder has noted that they do not support the selection of a permanent trailhead location given that the Forest Service's Trail Alignment Alternatives Study and the environmental review processes have yet to be completed. The stakeholder has respectfully urged United to consider changing the proposed trailhead location to an "interim location" until the Trail Alignment Alternative Study, environmental review and trail design standards have been completed and analyzed. The stakeholder notes that they believe this will provide for a more informed decision and allow for further input from the public and other stakeholders.	Comments noted. Based on the comments received from stakeholders, the District plans to incorporate the recommended changes noted here as part the draft Recreation Trail Plan. It will now be noted in the draft Recreation Trail Plan that the proposed trailhead location site at the former Lisk Ranch Homestead is an "interim" location to be considered for change upon the completion of the Forest Service Trail Alignment Alternatives

**Santa Felicia Project  
Recreation Trail Plan - Stakeholder Comment Review**

Item #	Stakeholder	Stakeholder Comments	UWCD Responses & Actions
20	Jeff Kuyper, Los Padres Forest Watch et. al	3. The stakeholder has noted that it is their belief that the proposed trailhead location at the Lisk Ranch Homestead site is less desirable and is not preferred and urges United to reconsider the Richenbach Road trailhead location as previously proposed in 2014. The stakeholder notes that the Richenbach location remains the preferred location and while they recognize concerns associated with trespassing and illegal hunting in this area, it is their belief that this trail location would promote users remain on the trail given the ease of terrain. Stakeholder also notes that illegal hunting will persist regardless of the trail location. The stakeholder notes concerns regarding the proposed trailhead location at the Lisk Ranch Homestead site, stating that this location presents numerous logistical and resource challenges, including that it impacts on areas of environmental concerns including Piru Creek and the Blue Point campground; impacts on riparian habitat in the immediate area of the homestead site; impacts on and raises concerns associated with impacts to the Arroyo Toad; the site's potential for flood inundation to both the road and the trailhead location; and the existing Pothole Trail location nearest the proposed trailhead site is logistically less desirable due to the steep terrain and elevation gains of the trail, making it much less attractive for users. The stakeholder urges the District to consider installing fencing and additional signage to minimize resource challenges should the Lisk Ranch Homestead site be selected.	The Plan has been revised to incorporate an environmental review process (CEQA) to evaluate alternative sites to identify the preferred sitelocation and design needs (including signage and gates). The CEQA process will be conducted in tandem with the Forest Services NEPA process to allow integration of products and results from the NEPA process.
21	Jeff Kuyper, Los Padres Forest Watch et. al	4. The stakeholder has noted that the Draft Plan does not include trash receptacles or restrooms for the use of trailhead users. Stakeholder has noted suggestion that United consider construction a single vault restroom at the permanent trailhead location and installation of a suitable trash bin at both an interim and permanent trailhead location in an effort to reduce environmental impacts.	United revised the Plan to include a phased approach to including provisions for trash and toilet facilities.
22	Jeff Kuyper, Los Padres Forest Watch et. al	5. The stakeholder would like to urge the District to consider posting a nighttime closer to perform the duty of locking gates to prevent access to the trailhead each night and suggest this person also lock the gate near the District's picnic area.	The Plan has been revised to include an evaluation regarding the potential to include gates and service hours in the CEQA process.
23	Jeff Kuyper, Los Padres Forest Watch et. al	6. The stakeholder has noted that the District's practice of charging the public either a \$10 or \$13 daily entrance fees to access National Forest Lands is excessive and prohibitive. The stakeholder has noted that they believe the current fees are not comparable to typical fees of other similar venues and suggest a \$5 fee, comparable to the Adventure Pass, would be sufficient. Additionally, the stakeholder has noted that a fee reduction could be implemented easily by implementing two separate tags for vehicles entering the park - one tag for hikers and one for regular recreation area useage. Additionally, by constructing a restroom and trash bins at the trailhead facility, the District could eliminate the need for vehicles to enter the Lake Piru Rec area to use its facilities and thereby would ultimately aid in overhead reductions and reduced fees. Lastly, the stakeholder has noted that public access existed well before the construction of Lake Piru and encourages a more robust discussion regarding fees associated with access to the trailhead.	The Plan includes a discussion regarding funding of maintenance activities. United asserts that a fee is necessary to offset maintenance of the United owned portions of Piru Canyon Road, the proposed trailhead parking lot and potential use of other recreation facilities by hikers, as well as maintenance of the trailhead parking lot facility. The use of separate tags, while considered, has been tried before and has proven to pose both enforcement and oversight challenges.
24	Jeff Kuyper, Los Padres Forest Watch et. al	7. The stakeholder has noted concerns associated with United's project schedule and implementation and has urged United to provide a more detailed and thorough project and implementation schedule which outlines a more comprehensive timeline and a detailed account of proposed actions, including who will be responsible for each action. Further, the stakeholder has raised the following questions: Why is "Phase 1" referenced? Is there a Phase 2? If there is a Phase 2, what does it entail?	The plan has been revised to update the schedule to the extent feasible prior to environmental review and design processes. The United Water Conservation District is the responsible party for all activities within United's discretion. A more comprehensive discussion has been added related to the phasing approach.
25	United States Department of Agriculture, Forest Service	1. The stakeholder notes Piru Canyon Road was built to a standard that allows for vehicles pulling trailers. The road has been closed to public access since 2000 for resource protection purposes. The federal government performed repairs to the road following the 2003 Piru Fire, but little or no maintenance has been conducted since that time. With the reestablishment of the Pothole Trail, the Forest Service is seeking funding to make improvements to this section of road. United's reference to and the use of language to describe Piru Canyon Road as an "unimproved" road is not consistent with Forest Service standards for an "unimproved" road. Further - the Pothole Trail will be built and maintained to accomodate equestrian users and Piru Canyon Road as defined by Forest Service standards is acceptable for vehicles pulling trailers.	The Plan has been revised to reflect the information in this comment. United has incorporated accommodations for vehicles with trailers in the Plan. United maintains reservations regarding the safety of the road.

**Santa Felicia Project**  
**Recreation Trail Plan - Stakeholder Comment Review**

Item #	Stakeholder	Stakeholder Comments	UWCD Responses & Actions
26	United States Department of Agriculture, Forest Service	2. The stakeholder has noted the Plan's reference to the Pothole Trail Alignment study is actually an assessment of two trail corridors that the Forest Service is studying and the study is not complete but rather it is underway. The stakeholder has noted that a consultant was hired to analyze both the reestablishment of the existing Pothole Trail Alignment and an alternative alignment at Richenbach Road and that the environmental review process will be started in Spring of 2016. The stakeholder noted that the final decision on trail alignment will be made following the NEPA evaluation process. In addition, reference within the Plan to siting the trailhead far from neighboring properties is not consistent with the NEPA decision process. No pre-decision has been made with regard to alternatives being assessed. All factors will be taken into consideration prior to the final decision.	The Plan has been revised to reflect the information in this comment.
27	United States Department of Agriculture, Forest Service	3. At this time the Forest Service is only looking at improvements to the Pothole Trail, and not assessing improvements to the Aqua Blanca Trail. The Plan's reference on page 5 that the Forest Service has cited public health and safety as the primary reasons for preventing vehicle access past locked gates is incorrect. The primary reason for the road closure is for resource protection for the endangered Arroyo Toad.	The Plan has been revised to reflect the information in this comment.
28	United States Department of Agriculture, Forest Service	4. The stakeholder noted that it is their recommendation that the District consider the inclusion of a toilet and trash receptacles in the design of the trailhead facilities in order to provide basic resource protection and to mitigate public health concerns.	United revised the Plan to include a phased approach to including provisions for trash and toilet facilities.
29	United States Department of Agriculture, Forest Service	5. The stakeholder has noted that regardless of the corridor selected for the trail location, the Forest Service will need to obtain an easement from the District for the purposes of construction, maintenance and public use of the trailhead in perpetuity.	The Plan has been revised to reflect the information in this comment.
30	Ventura County Resource Management Agency- Planning Division, Laura Hocking	1. The stakeholder has requested clarification as to whether the proposed trailhead construction project will occur on Forest Service Land or County jurisdiction lands. The Stakeholder has noted that, should the project occur on County jurisdiction lands, it suggests the District conduct environmental analysis pursuant to the California Environmental Quality Act (CEQA) and that the evaluation consider all environmental impacts pursuant to Ventura County CEQA thresholds.	The Plan has been revised to include a discussion of the CEQA process.
31	Ventura County Watershed Protection Agency, Zia Hosseinipour	1. The Stakeholder has noted that the Ventura County Watershed Protection District owns and maintains numerous rain gauge stations throughout Ventura County as part of its flood warning system. Stakeholder also noted that the agency currently operates gage #172, located east of Piru Canyon Road at the northerly end of Lake Piru. The stakeholder has also noted concerns that the proposed trail alignment as shown in Exhibit A of the Recreation Trail Plan is close to gauge #172 and could pose adverse impacts to the stakeholder's gauge. The stakeholder has requested that the District work with the Agency's Hydrologist, Mr. Ron Motto, to address the proposed trail alignment and, if necessary, redesign the alignment in order to maintain operation of the gauge.	The stakeholder's comments are noted. United will consult the Watershed Protection Agency's Hydrologist Ron Marotto to further address the agency's concerns regarding the trail alignment. It should be noted that no construction will occur until the county has approved the proposed trailhead location. Further, the alignment of the trail is at the discretion of the Forest Service. Lastly, it should be noted that both the proposed trailhead alignment being considered by the Forest Service and the proposed trailhead alternative locations are approximately two miles north of the Watershed Protection Agency's gauge #172 and to the west of Piru Canyon Road. Thus, the District does



**Appendix D**

**Copies of Comment Letters in response to  
Draft Santa Felicia Project Recreation Trail Plan  
Dated December 30, 2015**

Jack, Marilyn Griffin and Family  
P.O. Box 386  
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Phone (805) 524-1908  
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RECEIVED  
JAN 25 2016  
United Water  
Conservation District

January 21, 2016

Anthony Emmert, Deputy General Manager  
United Water Conservation District  
106 N. 8<sup>th</sup> Street  
Santa Paula, CA 93060

Regarding: United Water Conservation District (UWCD) Letter of December 31<sup>st</sup>, 2015

Dear Mr. Emmert,

We have received your letter and would like to submit the following comments for your consideration in developing any plans for trails near our Piru property.

Opening statement. Our overall position is we are against opening up the currently locked gates because it will lead to more poaching, litter, vandalism, removal of "No Trespassing" signs, being shot at, and perhaps worse on our property. We have evidence in the form of pictures to support such claims. However, if it is absolutely necessary to open the gates then we recommend opening all gates on the Lake Piru road to allow the public greater access to all public lands. Under no circumstances do we support opening the gate at the intersection of the Lake Piru road and Rickenbacker road that leads to our property. America is still a free county and the citizens who are the taxpayers own this land and have a right to access it but property owners have rights too, and we wish to protect those rights. We also suspect the USFS and other law enforcement entities may not be able to provide the necessary law enforcement, litter and waste removal that will be needed to support the proposal. We believe that private landowners such as ourselves deserve to have our land protected and currently that is not being done. There are numerous trespassers, poachers, and vandals who have been coming on our property for years. If this project goes through, we hope United Water can find a way to allow public access to public land while preserving the rights of landowners. Additionally, one landowner should not receive greater consideration than another. That is why we think if you are to remove the current gates, then remove them all in the Lake Piru area. At the same time, you must ensure local law enforcement, and game wardens are there to do their job.

After reading the reference letter, we have the following points to make:

1. We would like a copy of FERC license No. 2153-12 Article 411. This document is not on the Internet to our knowledge. If possible, please email us a copy at our email address above.
2. Who are the other "stakeholders and consulting agencies" as referred to in the letter? Our concern is that there are some who are asking UWCD and other agencies

- for better trail access but what they really want is easier access to private land for poaching or growing drugs.
3. Any proposed new trail that will go through public land that is near our property will only increase easy access for poachers, and trespassers. Our property is somewhat of a wildlife habitat sanctuary away from hunters and poachers. That is why animals go there.
  4. Pictures of poachers, and trespassers, on our property are available on request. They have already been provided to local law enforcement.
  5. There are lodges and/or clubs in the area that charge members a fee or work time to join. In exchange for this fee or service, keys for access passed locked road gates are given. Those participants (hunters and hikers) then have easier access to public land than the general public. If the intent is to allow hunters and hikers easier access to trails and public lands then all gates should be removed. This does not include gates to private land, or UWCD land. The proposed parking lot and new gate will end near the Pothole trailhead but will not be near the Agua Blanca trail. The Agua Blanca trail allows much easier access to the Pothole, and more public land. Thus we recommend if you are to remove some gates on the Lake Piru road, remove them all. We speculate that hunting pressure and poaching will increase, more animals will be killed, and litter will proliferate. These factors are an issue that all interested parties should be made aware.
  6. We have seen and have pictures of wild animals on our property where these animals seek sanctuary. Let it be known to those who love nature that improving access to public lands will also allow poachers easier access to those same areas including areas where animals seek sanctuary, both public and private. Although we have hunted on our property in the past, we have not hunted there in the last two years. Poaching has greatly reduced deer population on our property.
  7. WRT funding and ease of implementation: As you are aware, there already exists two trails to the Pothole area; the Pothole trail and the Agua Blanca trail. There is no need for further funding to make any new trails, as some have suggested. This is a waste of taxpayer dollars. If United Water, the USFS, Californian parks, and other stakeholders wish to increase trail access then they should remove all Lake Piru road gates including the one at the Blue Point camp area. Additionally, those trails could be improved at a much lower cost than creating new ones.
  8. On page 2 of recreational trail plan under BACKGROUND AND RESULTS OF CONSULTATION, it states, "...United confirmed that no Forest Service trails or roadways existed in the Angles National forest Property east of the lake..." There is public land on the northeast part of the lake. This might be a good place to put a trail that leads to the east or north.
  9. We applaud United's proposal to inspect, repair, and replace "NO TRESSPASSING" signs. Vandals have repeatedly removed them in the past. There are no (or very few) no-trespassing signs on the south, west or east sides of the Griffin property at this time. Vandals have removed most of them; including ones installed by UWCD.
  10. Additionally the text on some of the signs is nebulous and results in increased trespassing. For example, the sign at the bottom of the Rickenbacker road says, "LISK RANCH (next line) PUBLIC ACCESS ACROSS UNITED WATER CONSERVATION DISTRICT IS STRICTLY LIMITED TO DESIGNATED ROADS ONLY..." There are other

United Water signs that simply say, "NO TRESSPASSING..." To anyone reading these signs, the first sign means, anyone may come this way as long as you stay on the road. Nothing could be further from the truth. The second example is very clear. We strongly recommend all signs to read simply, "No Trespassing". The Griffin property has a legal right to cross the Lisk ranch land and needs no exception to the signage. Neither does the USFS or other government agencies. Pictures of both signs are available upon request.

11. Just to be clear, the Griffin property does not allow anyone on our property other than family, law enforcement, and fire crews, unless they are escorted by a Griffin family member. WE do not sell access, hunting rights, or receive any compensation other than enjoying our land ourselves.
12. The statement that the existing Pothole trail is too steep is false and is judgmental. As reported by Tony Ward the previous Dam manager, there was an old man who used to hike it almost daily. The elevation gained over any trail to the Pothole would essentially be the same. If the existing trail is too steep by someone's estimate then switchbacks could be installed. This would be easier and less expensive than making an entire new trail. Alternatively, the shortest and least steep access to the Pothole would be to allow access past Blue Point, and improve the Agua Blanca trail. We recommend this solution as it uses an existing trail, opens more public land, is less steep, provides more water, is much more in the shade, and is the shortest path from any road.
13. On page 6 when discussing site selection factors for a new parking lot, it mentions, "... is not subject to regular flood inundation..." When was the last time that new proposed area on the north side of the Lisk Ranch flooded? I have never seen it in 40 years. This location is the second or third best location to put a parking lot and much closer to the existing Pothole trail. But as previously mentioned, making access to the Agua Blanca trail is even better. There is a large area just north of the Blue Point campground that could be made into a parking area. We think these are the two best locations for a new parking lot.
14. What will prevent the public from overnight camping in the new proposed parking lot? Or along the Lake Piru road? Or is overnight parking to be allowed?
15. Does United's proposal to maintain the parking lot include trash and fecal matter removal since no trash bins or toilet facilities will be installed? Seems it might be best just to reopen the Blue Point campground but for limited use only. It has toilets and a large turn around area.
16. The comment that United water will install a locking gate to prevent vehicles in the trail head parking lot from proceeding west on Rickenbacker road are commendable and appreciated. However, it is worth mentioning that locks on the existing gate have been cut or sawed off at least 3 times in the last 5 years and numerous times before that. Any new gates should be very robust and prevent vandals from removing locks. Also, the Griffin property owners would like to know where that proposed gate would be located. Is it to replace the existing gate in the same location? Or will another gate be added? In either case, we recommend keeping the existing gate on the Rickenbacker road, locked at all times.

17. It is further recommended that "No Parking" signs be posted along the Lake Piru road, especially near the Rickenbacker road intersection, as it is anticipated that many will want to park in areas not designated as such.

In summary, the major points we wish to make are:

A. We recommend not opening the currently locked gates. The Gate on the Rickenbacker road should never be unlocked for public access.

B. Trails already exist and can be easily improved at a lower cost than building new trails.

C. Poachers and trespassers want easy access to private and public lands where animals may seek sanctuary.

D. "No Trespassing", "No Parking", and "No Littering" signage needs improvement and maintenance.

E. If the intent is to open up public lands, then ALL gates to public land should be removed. With all gates removed, access to the Pothole and other areas via the Agua Blanca trail will greatly improve. The Blue Point campground is an easy place to improve for a turn around, parking, toilets, and trash bins.

F. Gates to private lands need to be improved so they cannot be vandalized.

Thank you and please keep us informed of any upcoming developments regarding these issues. We may share this letter with other agencies as well to express our thoughts.

Best regards,



Jack and Marilyn Griffin, and Family

**CALIFORNIA TROUT • CONDOR TRAIL ASSOCIATION  
FRIENDS OF THE SANTA CLARA RIVER • KEEP THE SESPE WILD COMMITTEE  
LOS PADRES FOREST ASSOCIATION • LOS PADRES FORESTWATCH  
SANTA CLARA RIVER WATERSHED CONSERVANCY  
SIERRA CLUB ANGELES CHAPTER • SIERRA CLUB LOS PADRES CHAPTER**

February 1, 2016

Anthony Emmert, Deputy General Manager  
United Water Conservation District  
106 N. 8th Street  
Santa Paula, CA 93060

RE: Comments on Final Draft Recreation Trails Plan

Dear Mr. Emmert:

Thank you for this opportunity to review and provide comments on the Final Draft Recreation Trails Plan ("Trails Plan") prepared by the United Water Conservation District ("United"). We welcome this long-awaited step to improve and enhance public access and recreational opportunities to trails leading from Lake Piru into the surrounding Los Padres National Forest.

Our organizations are deeply concerned about the challenges that the public faces while attempting to access long-established hiking trails. The Lake Piru area has traditionally served as one of the main ways for local residents to access the Agua Blanca and Potholes trails, and points beyond in the Sespe Wilderness. However, today the public must pay a \$10-13 fee per day, and then hike 3-4 miles along a paved gated road before arriving at the Potholes trailhead. The Agua Blanca trailhead is another mile up the paved road, followed by another 1.5 miles on a dirt road before arriving at the trailhead. Together, these present a substantial barrier to public trail access in this area, leaving tens of thousands of acres of the Los Padres National Forest inaccessible to most.

We provided initial comments in 2013, and participated in the field trip in 2014. The draft Trails Plan represents a good first step towards addressing the challenges that the public faces while trying to access this area of the national forest. Specifically, the draft Trails Plan contains the following actions:

- United will construct an initial trailhead parking lot on an approximately 1 acre site to accommodate parking and interpretive signage to serve both the Pothole and Agua Blanca [please correct spelling throughout the report] trails.
- The trailhead parking lot design and specifications will be prepared in consultation with the Forest Service. In the future, if the Forest Service is able to secure funding to improve Piru Canyon Road so that it is safe for trucks pulling trailers, then United may expand the parking lot to include up to four pull-through spaces for horse trailers and hitching rails for horses.
- United will support the Forest Service's continuing efforts to seek funding to improve the roadway. In the short term, United and the Forest Service will work to improve signage to

inform drivers of the hazards of the roadway, and United will explore options for the construction of an improved turn-around at the Juan Fernandez Boat Launch Facility.

- Due to its remote location and potential for vandalism, the trailhead parking lot will not include trash receptacles or toilet facilities.
- United will maintain the trailhead parking lot as a component of its recreational infrastructure and facilities, and will include funds to cover necessary expenditures as a part of its annual budget process.
- No plans to eliminate or adjust the \$10-13 entrance fee.
- Interpretive signage will be posted at the trailhead parking lot.
- United will install a locking gate to prevent vehicles in the trailhead parking lot from proceeding west on Rickenbacker Ranch Road toward the private property.

Thank you for incorporating these much-needed steps to facilitate public access to the Los Padres National Forest. We hope to see the Trail Plan modified to ensure that (1) it is fully consistent with the Forest Service's trail analysis for the area, (2) the trailhead is properly outfitted with restrooms and trash receptacles, (3) the entrance fee is reduced or eliminated, and (4) an implementation schedule is incorporated. Our specific comments on the Trails Plan are as follows:

#### **Trailhead Location**

The Trails Plan notes that the Forest Service is currently evaluating the realignment of the Potholes Trail. This evaluation will consider various alternatives and select the best route based on an environmental analysis performed under the National Environmental Policy Act ("NEPA"). However, the Trails Plan incorrectly states that the Forest Service has "recently completed its Pothole Trail Alignment Alternatives Study." No such study has been completed, and the project does not even appear in the Forest Service's quarterly Schedule of Proposed Actions that describes projects that are pending or in the planning stage.

For this reason, we think it is premature to identify a permanent trailhead location in the Trails Plan. Such location is best guided by the robust public process and environmental review currently underway by the Forest Service. Once this process is complete, the Forest Service and United Water will have the information needed to make an informed decision about the best location for the trailhead, based on environmental concerns, Forest Service trail design standards, and input from the public and other stakeholders. Identifying an "interim" location will facilitate public access as this process unfolds.

The Trails Plan identifies Rickenbacker Ranch Road as a preferred location for the trailhead, but rejects this location due to concerns from the adjoining landowner. Instead, the Trails Plan proposes to locate the trailhead at the Lisk Ranch homestead. Our organizations support identifying this as an "interim location" in the Trails Plan pending completion of the Forest Service's analysis. If the trailhead is moved from the interim site, the interim site could be reused as an overflow lot or other purpose such as an equestrian staging area if the need exists.

Our preferred trailhead site remains at Rickenbacker Road as discussed at the meeting in 2014. We understand that the landowner to the west has concerns about trespassers on his property. However, the trail routed around his property would provide incentives for legitimate hikers to avoid his land and stay on the trail. It is probable that illegal hunters will continue to trespass on his land as they currently do regardless of the road being opened to forest users.

The new location using the old Lisk homestead site is the second most preferred site. There is ample room for parking and the site has nice shade and a pastoral setting. It is closer to the existing Pothole and Agua Blanca Trails. However, it has several logistical and resource challenges that may make it unsuitable for a permanent, long-term trailhead. It is closer to the closed Blue Point Campground and it is likely that many users of the new trailhead will walk the 1.5 miles along the road to recreate in Piru Creek. This is an area of environmental concern and it will be necessary to provide signs and possibly fences to protect the natural resources of the area. The Forest Service and United will need to formulate a plan to account for the possible impacts to the riparian area. From this location, the Potholes Trail has more elevation gain, and this section of road is prone to flooding with possible arroyo toad issues (an arroyo toad was recently observed along that section of road).

### **Restrooms**

The Trail Plan states, “Due to its remote location and potential for vandalism, the trailhead parking lot will not include trash receptacles or toilet facilities. Hikers will have access to trash receptacles and restrooms located in United’s Lake Piru Recreation Area further south along Piru Canyon Road.”

We urge United to include a single vault restroom at the permanent trailhead site along with a suitable trash bin at both the interim and permanent sites. Without these amenities the environment will be degraded with toilet paper and trash strewn about. These facilities would not entice people to camp at the trailhead. People who intentionally violate the rules are not likely to change their decisions based on the facilities at the site.

United Water should consider posting a nighttime closer of the road at the current gate just north of the District’s picnic area. This would significantly deter vandalism and rowdy behavior at the site. It would also make it difficult for people to illegally camp at the trailhead. Currently the District locks the gate at the picnic area at night. A reasonable closure, seasonally adjusted would be appropriate, such as 6 am to 8 pm spring to fall, and 6 am to 6 pm from late fall to early spring. Nighttime closures are used in other forest in the region such as the popular Chantry Flats north of Arcadia in the Angeles National Forest. The hours would be posted on-site, and for people locked inside the gate needing assistance, it is a short walk to pay phones at the District’s recreational facilities.

### **Entrance Fee**

United Water currently requires the public to purchase a \$10-13 daily pass to access national forest lands. This fee is excessive and prohibitive for those who simply wish to park their vehicle and hike adjacent lands, particularly for excursions lasting multiple days. A \$5 fee comparable to the Adventure Pass should suffice, *if any fee at all is levied*.

We presented this concern in our letters dated August 14, 2013 and July 29, 2015. However, United Water has refused to acknowledge the burden that this fee places on the public, and includes the following statement in the Trails Plan:

United disagrees with the elimination or reduction of the day use fee applied to individuals entering the Lake Piru Recreation Area to access Forest Service trails. The nominal fee is necessary to off-set maintenance of the United-owned portions of Piru



Canyon Road (entrance gate to Juan Fernandez Boat Launch Facility), the proposed trailhead parking lot, and hikers' use of day use facilities in the Lake Piru Recreation Area. It is not practical or feasible for United or its Lake Piru Recreation Area concessionaire to track visitors passing through the Recreation Area entrance gate who intend only to hike on Forest Service trails and not use the recreation area facilities, nor to attempt to exclude them from such use. The recreation area day use facilities will be available to hikers. Additionally, United sees no need to set up a separate "maintenance" fund for the trailhead parking lot.

The proposed entry fee of \$10 to \$13 is not “nominal” – it is very high when compared with typical fees charged at similar venues in Southern California. Indeed, this price is almost in the valet service bracket. The construction of a restroom and trash bins at the trailhead would eliminate the need for trail users to use the District’s other facilities. We do not believe it would greatly inconvenience the concessionaire to issue 2 different tickets depending on where the visitors intend to go.

We recognize that United Water incurs significant costs in maintaining its recreational facilities at Lake Piru. However, United Water should not be able to charge high entrance fees as a way to recoup the costs of compliance with the requirement in its FERC license to facilitate public access to surrounding national forest lands. Public access to this area dates back to at least the 1920s (an access road and trail appear on the 1926 Santa Barbara National Forest Map), well before the construction of Lake Piru. We encourage a more robust discussion of the fee issue in the Trails Plan, including alternatives to reduce or eliminate the fee. A fee reduction is not subject to CEQA and should be implemented immediately.

### **Implementation Schedule**

The Trails Plan should include an implementation schedule that clearly identifies the specific actions needed to implement the plan, the party responsible for implementing each action, and a timeline for compliance. The schedule should take into account any environmental review and public comment opportunities provided by CEQA and NEPA.

The Trails Plan does include a “Pothole Trail Trailhead Phase 1 Project Schedule.” However, this schedule does not contain all of the commitments outlined in the Trails Plan. It is also unclear why “Phase 1” is referenced – is there a Phase 2, and if so, what does it entail?

### **Conclusion**

Thank you for your consideration of our comments as you finalize the Trails Plan. In sum, we urge United to incorporate the following modifications to the Trails Plan:

- Identify the selected Lisk homestead trailhead site as an “interim” location and commit to moving the trailhead to a new location based on the results of the Forest Service’s analysis;
- Consider ways to discourage public access to the abandoned Blue Point Campground to protect endangered arroyo toads and other species of concern in Piru Creek;
- Include a single vault restroom at the permanent trailhead site along with a suitable trash bin at both the interim and permanent sites;
- Consider closing the current gate at night to discourage vandalism and overnight camping;
- Reduce or eliminate the entrance fee for trail users; and

- Include an implementation schedule that clearly identifies the specific actions needed to implement the plan, the party responsible for implementing each action, and a timeline for compliance.

Please provide our organizations with a copy of the final Trails Plan upon completion. We look forward to working with United Water to facilitate improved public access to the Los Padres National Forest.

Best regards,

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cc: Congresswoman Julia Brownley  
 Mark Ivy, PhD, Outdoor Recreation Planner, Federal Energy Regulatory Commission  
 Sue Exline, District Ranger, Los Padres National Forest



United States  
Department of  
Agriculture

Forest  
Service

Los Padres National Forest  
Ojai Ranger District

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File Code: 1560/1900

Date: February 9, 2016

Anthony Emmert  
Deputy General Manager  
United Water Conservation District  
106 N. 8<sup>th</sup> Street  
Santa Paula, CA. 93060

Dear Mr. Emmert:

Thank you for the opportunity to provide comments on the United Water Conservation District (UWCD) Recreation Trail Plan associated with the Santa Felicia Project, Federal Energy Regulatory Commission License Number 2153-102, Article 411. The following is my response to the Draft Recreation Trails Plan:

### **Piru Canyon Road**

Piru Canyon Road (Forest Service Road 4N13) was designed and built as a one-lane road with turnouts. The road was built to a standard that allows for vehicles pulling trailers. In 2000, the road was closed due to resource protection. After the 2003 Piru Fire, the federal government made a significant investment to repair the road. Since then, little to no maintenance has occurred due to the road remaining closed to public use. Furthermore, the term "unimproved" as used by UWCD is not consistent with definitions used by the Forest Service. According to Forest Service Road Standards, an "unimproved" road has no surfacing and is of native material. Piru Canyon Road has surfacing, although its condition is degraded. With the reestablishment of the Pothole Trail, the Forest Service is seeking funding to improve the roadbed and condition of the Piru Canyon Road.

The Pothole Trail will be built and maintained to accommodate equestrian users. The Piru Canyon Road (4N13), as defined by Forest Service standards, is acceptable for vehicles pulling trailers. We recommend that the trailhead also be built to a standard to accommodate vehicles pulling trailers.

### **Pothole Trail Study**

The reference to the "Pothole Trail Alignment Alternatives Study" is actually an assessment of two corridors that the Forest Service is studying for the reestablishment of the Pothole Trail. A consultant was hired to look at the original alignment of the Pothole Trail as well as an alternative alignment on the Reichenbach Road. Both corridors will be considered and analyzed in the environmental review process which



should start in the spring of 2016. We hope to have a final decision on a trail alignment by early 2017. Construction should start after that in the summer/fall of 2017.

### **Pothole Trailhead**

You refer to siting a trailhead as far away from neighboring properties as possible. The Forest Service will analyze both trail corridors through an environmental analysis process to determine a trail alignment. I have not made a pre-decision to locate the trail away from private property and will allow the analysis process to consider impacts including those to local landowners. I will take all factors into consideration before making a final decision on the trail alignment.

### **Trail Improvements and Closure of Piru Road (4N13)**

At this time the Forest Service is only looking at improvements to the Pothole Trail; we are not analyzing improvements for the Agua Blanca Trail.

You state on page 5, "The Forest Service cites public health and safety as the primary reason for preventing vehicle access past its locked gates." The primary reason for the road closure is for resource protection for the endangered Arroyo Toad, found in the vicinity of the Blue Point Campground (also closed to protect the Arroyo Toad).

### **Trash Receptacles and Toilets**

We would recommend that UWCD consider a toilet and trash receptacles in the design of the trailhead facilities. These facilities can provide basic resource protection and mitigate public health concerns.

### **Trail Easement**

Regardless of which corridor is selected for the trail location, there is a need for the United States Government to obtain a permanent trail easement from UWCD for the purposes of construction, maintenance and public use of the Pothole Trail. The easement will allow permanent access in perpetuity to adjacent National Forest Lands.

We look forward to continued coordination with UWCD on the enhancement of recreational opportunities in the Lake Piru area. If you have any questions, please contact me or Charles Robinson, District Recreation Officer.

Sincerely,

  
SUSAN K. EXLINE  
District Ranger

# county of ventura

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February 1, 2016

United Water Conservation District  
Attn: Anthony Emmert, Deputy General Manager  
106 N. 8<sup>th</sup> Street  
Santa Paula, CA 93060

Email: [tonye@unitedwater.org](mailto:tonye@unitedwater.org)

Subject: Comments on the Recreation Trail Plan Final Draft for the Santa Felicia Project


Dear Mr. Emmert:

Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document. Additional comments may have been sent directly to you by other County agencies.

Your proposed responses to these comments should be sent directly to the commenter, with a copy to Laura Hocking, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Laura Hocking at (805) 654-2443.

Sincerely,

  
Tricia Maier, Manager  
Planning Programs Section

Attachments

County RMA Reference Number 16-003





# Memorandum

County of Ventura • Resource Management Agency • Planning Division  
800 S. Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2478 • [ventura.org/rma/planning](http://ventura.org/rma/planning)

**DATE:** January 27, 2016

**TO:** Laura Hocking, Ventura County Planning Division

**FROM:** Whitney Wilkinson, Ventura County Planning Division

**SUBJECT:** Negative Declaration and Initial Study for the Wastewater Reclamation Facility Recycled Water Project (RMA 16-001)

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I have reviewed United Water Conservation District's (United) Final Draft Recreation Trail Plan for Santa Felicia Project (Plan) (RMA 16-003). The project includes the construction of a trailhead parking lot, future potential road improvements to Piru Canyon Road, the removal of a locked gate, etc. in the areas northwest of Lake Piru. United has prepared this Plan to comply with the requirements of its license issued by the Federal Energy Regulatory Commission (FERC).

It is not clear from the maps or description with the Plan if the proposed trailhead parking lot and future road improvements to Piru Canyon Road would occur on County-jurisdiction lands or exclusively within lands managed by the US Forest Service. If portions of the project area are under County jurisdiction (e.g. not managed by the US Forest Service), the Planning Division strongly recommends that the environmental analysis prepared pursuant to the California Environmental Quality Act (CEQA) evaluate project impacts using the County's CEQA thresholds that are set forth in the Initial Study Assessment Guidelines (ISAGs) that are available on-line at:

[https://www.ventura.org/rma/planning/pdf/ceqa/current\\_ISAG.pdf](https://www.ventura.org/rma/planning/pdf/ceqa/current_ISAG.pdf)

The ISAGs contain CEQA thresholds with respect to special status species, sensitive plant communities, waters and wetlands, and wildlife movement and habitat connectivity. In addition, any development that has the potential to impact the County's resources must be consistent with the County's General Plan Goals, Policies, and Programs that are available on-line at:

<http://www.countyofventura.org/rma/planning/pdf/plans/Goals-Policies-and-Programs-6-28-11.pdf>

Note that the proposed project lies within a mapped wildlife migration corridor (Sierra Madre-Castaic Connection) which is designated as a significant biological resource in the County's General Plan.

Thank you for the opportunity to comment on the Plan. If you have questions regarding the information set forth in this memo, please contact Whitney Wilkinson at 805-654-2462 or [whitney.wilkinson@ventura.org](mailto:whitney.wilkinson@ventura.org).





**VENTURA COUNTY WATERSHED PROTECTION AGENCY**  
**PLANNING AND REGULATORY DIVISION**  
800 South Victoria Avenue, Ventura, California 93009  
Zia Hosseinipour – Manager, Advance Planning (805) 654-2454

**M E M O R A N D U M**

DATE: January 25, 2016

TO: Mr. Anthony Emmert, Deputy General Manager, United Water Conservation District  
Ms. Laura Hocking, Case Planner, Ventura County Resource Management Agency: Planning Department

FROM: Zia Hosseinipour, Manager of Advance Planning *Zia Hosseinipour*  
Planning and Regulatory

SUBJECT: Docket No. P-2153-041 Recreation Trail Plan for Santa Felicia Project (FERC No. 2153-12/ License Article 411/ Recreation Trail Plan  
North of Piru Creek, Piru Lake, Zone 2

Pursuant to your request, this office has reviewed the Project package submitted by the United Water Conservation District, dated January 5, 2016 including the draft "Santa Felicia Project – Recreation Trail Plan: Santa Felicia Project FERC License No. 2153-12", dated December 30, 2015, and offers the following comment:

**VENTURA COUNTY WATERSHED PROTECTION DISTRICT COMMENT:**

The Ventura County Watershed Protection District (District) owns and maintains numerous rain gage stations throughout Ventura County as part of its flood warning system. Existing Piru Canyon Rain Gage #172 is located east of Piru Canyon Road at the northerly end of Lake Piru. The proposed trail alignment, as illustrated on Exhibit A of the draft report entitled "Santa Felicia Project – Recreation Trail Plan: Santa Felicia Project FERC License No. 2153-12" (December 30, 2015), appears to be located close to the District's rain gage and may potentially adversely impact the operation of the gage. The District requests that United Water staff contact Mr. Ron Marotto, District Hydrologist (805-654-2044) to address the proposed trail alignment and, if deemed necessary, redesign the alignment in order to maintain the operation of the gage.

**End of Text**