



Alameda Creek Alliance

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ACA Scoping Comments on Alameda Creek Recapture Project, 2015-004827ENV

These are the scoping comments of the Alameda Creek Alliance on the proposed SFPUC Alameda Creek Recapture Project, Case No. 2015-004827ENV.

Improvements over Previous Project Designs

Previous design proposals for the Alameda Creek Recapture Project included construction of an inflatable rubber dam or installing an in-stream infiltration gallery under Alameda Creek in the Sunol Valley, to recapture water released from or bypassed at Alameda Creek Diversion Dam and Calaveras Dam. Both of these recapture approaches would have required construction of infrastructure in Alameda Creek which could have had impacts on fish migration, water quality, in-stream habitat, spread of invasive species, and riparian vegetation. The project as currently proposed, with the water recapture location moved to an off-stream quarry pit, removes those potential impacts from the project.

Potential Impacts of Groundwater Mining On Surface Flows in Alameda Creek

The proposed project will “recapture” Alameda Creek groundwater that flows subsurface and infiltrates into quarry Pit F2. The Environmental Impact Report should describe the origin of this water, the hydrologic connections between the groundwater that infiltrates into Pit F2 and the Sunol Valley groundwater basins, and the hydrologic connections between this water and surface water flows in Alameda Creek above, adjacent to and below the project reach. The EIR should analyze the impacts of mining up to 9,820 acre-feet of groundwater annually from Pit F2, on groundwater resources in the Sunol Valley and downstream in Niles Canyon, on surface water flows in Alameda Creek through the Sunol Valley and downstream through Niles Canyon, and any potential impacts on fisheries and other aquatic resources, including habitat alteration or impairment of fish migration corridors. If there are impacts to surface flow in Alameda Creek from the project, appropriate avoidance and mitigation measures should be incorporated.

Concern about “Recapture” of In-Stream Flows Intended for Fish Migration

The Alameda Creek Alliance has concerns about the precedent of “recapturing” bypass and release flows that are intended to benefit migration of anadromous steelhead trout throughout the length of Alameda Creek from below the Alameda Creek Diversion Dam downstream to San Francisco Bay.

The Water System Improvement Program adopted in 2008 by the SFPUC anticipated,

discussed and evaluated recapturing only 6,300 acre-feet of flow releases from Calaveras Dam annually, as part of the “Alameda Creek Fishery Enhancement Project” – now the proposed Alameda Creek Recapture Project. This recapture was to be of summer flows released from Calaveras Reservoir intended to enhance rearing habitat in upper Alameda Creek from the confluence with Calaveras Creek downstream to the vicinity of the Sunol Water Treatment Plant. The lower end of this reach is characterized by permeable gravels that result in a lack of surface flow in Alameda Creek during summer and fall months. Thus the Calaveras flow releases would enhance about 5 miles of upper Alameda Creek from the confluence with Calaveras Creek downstream to the vicinity of the water treatment plant, providing cold water flows for improved rearing of juvenile trout. Recapturing these summer rearing flows on the downstream end of the release reach would have no impact on trout rearing conditions or trout migration, and the Alameda Creek Alliance has no objection to recapturing these flows or an equivalent amount of water.

However, the current project proposes to increase the water recapture to an average of 9,820 acre-feet annually, including water bypassed at the Alameda Creek Diversion Dam that is specifically intended to benefit upstream and downstream migration of adult and juvenile trout along the length of Alameda Creek from the Alameda Creek Diversion Dam downstream to San Francisco Bay.

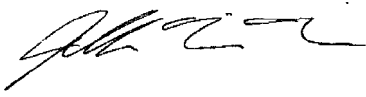
The proposed project would essentially recapture equivalent surrogate flows, not recapture the actual flow releases and bypass flows from Calaveras Reservoir and the Alameda Creek Diversion Dam. Our objection is philosophical, since the fall, winter and spring flows bypassed at the ACDD will actually continue downstream to either infiltrate into the Sunol groundwater basin or flow down Alameda Creek through the Sunol Valley and Niles Canyon. The current SFPUC project proposes to mine an equivalent amount of groundwater from the Sunol Valley Pit F2, from May to October, mostly outside of the trout migration season and from an off-stream location.

Our concerns relate to the precedent of “recapturing” surrogate flows or offsetting flow releases and bypass flows which are intended to continue downstream to improve stream flows for trout migration. To benefit steelhead migration, these flows must reach San Francisco Bay or contribute significantly to natural flows in Alameda Creek and flows from other portions of the watershed that reach the bay, to allow adequate hydrologic connection for adult steelhead to migrate all the way upstream past the ACDD, or for juvenile steelhead to migrate from the ACDD reach downstream to the Bay.

The final EIR for the Calaveras Dam Replacement Project (Jan 5, 2011) characterized ACDD bypass flows as only intended to enhance trout spawning in Alameda Creek from the diversion dam downstream only to the confluence with Calaveras Creek, not to provide migration flows. The FEIR states: “Implementation of the proposed bypass flows at the ACDD is intended to improve spawning habitat for resident trout and future steelhead and would provide a more natural base-flow hydrology within approximately 16,000 linear feet of habitat in Alameda Creek above the confluence with Calaveras Creek.” (p 9-36)

Yet the March 5, 2011 Biological Opinion (“BO”) by the National Marine Fisheries Service for the Calaveras Dam Replacement Project explicitly anticipated (pp 49-52) that bypass flows at the Alameda Creek Diversion Dam would provide suitable migration conditions for steelhead trout from Alameda Creek below the ACDD *all the way downstream through Niles Canyon and Lower Alameda Creek to San Francisco Bay*. The BO stated (p 52) that “CDRP minimum flows from the southern watershed when combined with flows from the northern watershed (at the confluence with the Arroyo de la Laguna) through Niles Canyon are expected to provide suitable conditions for adult upstream migration and smolt downstream migration. These flows will arrive at the upstream end of the Alameda Creek Flood Control Channel and ACWD will provide bypass flows at their water diversion facilities for fish passage through the Flood Channel.”

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Miller". The signature is fluid and cursive, with the first name "Jeff" being more prominent than the last name "Miller".

Jeff Miller
Director, Alameda Creek Alliance