



Alameda Creek Alliance

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San Francisco Planning Department
Attention: Paul Maltzer
Environmental Review Officer, WSIP PEIR
30 Van Ness Avenue, Suite 4150
San Francisco, CA 94103

Re: Scoping comments on WSIP PEIR

These are the comments of the Alameda Creek Alliance (ACA) on the Program Environmental Impact Report (PEIR) for the SFPUC's Water System Improvement Program (WSIP). Recently, 65 Bay Area conservation organizations representing tens of thousands of Bay Area residents sent the SFPUC a letter requesting that the SFPUC take immediate actions to restore Alameda Creek. The WSIP should incorporate these actions into funded projects and the overall program should reflect the public's desire for a just and sustainable water system that protects and restores the watersheds and wildlife habitats under the SFPUC's management.

Conservation and recycling

The ACA supports the SFPUC's efforts to make needed repairs and earthquake safety retrofits to its water system. However, increases in future demand should be met through conservation and water use efficiency projects rather than infrastructure that expands the capacity of the system to withdraw more water from SFPUC watersheds.

Stewardship and restoration actions need to be included

Measures A and E, the legislation authorizing the financing for the WSIP approved by San Francisco voters in November of 2002, made it clear that water conservation, stewardship, and environmental restoration were to be part of the WSIP. Proposition E states; "in planning for its future needs and those of its wholesale customers, the City must promote water conservation and responsible stewardship of its natural resources." Proposition A states that such improvements; "include, but are not limited to, water delivery and seismic improvements, water quality improvements, water supply improvements, and watershed and environmental improvements..."

A major failing of the WSIP is that it does not include stewardship and restoration actions as an integral part of the program, or as specific improvement projects contemplated in the PEIR. The recent Parsons/CH2MHill report to the SFPUC concluded that "activities reflecting the SFPUC's commitment to integrate the Stewardship Policy and Principles into the WSIP have not been made explicit" and have "not been fully applied to the program." The Parsons/CH2MHill report recommended ensuring that the watershed stewardship policy is applied consistently to the program and project-specific scopes. The ACA can only support WSIP projects which both include specific environmental benefits that mitigate for the environmental impacts of the project and fund a restoration and stewardship component of the project.

Watershed and ecosystem restoration, specifically habitat protection and enhancement for the SFPUC watersheds affected by the WSIP (Alameda Creek, the Tuolumne River, and Peninsula

watersheds), should be an explicit part of the program description, goals and objectives. Environmental benefits should be integrated into all WSIP projects involving major facilities or potentially significant environmental impacts. The PEIR for the WSIP should include specific stewardship objectives and timelines, and funding for stewardship and restoration actions in affected ecosystems should be commensurate with past and contemplated environmental impacts from the SFPUC's water supply system. The PEIR should specifically include funding for watershed improvement projects such as land acquisition and habitat restoration.

Stream flows for affected SFPUC watersheds

Three existing SFPUC dams block most of the suitable steelhead trout spawning and rearing habitat in the Alameda Creek watershed. Since the proposed replacement for Calaveras Dam will also block access for anadromous fish into the upper watershed and since the SFPUC diverts over 85% of the natural stream flow of upper Alameda Creek, the PEIR should evaluate the need and potential for increased stream flows below all SFPUC dams and diversions, to restore sufficient instream flows to sustain native fish in good condition. The PEIR description of the need for the WSIP should mention the impact of all existing and planned SFPUC facilities on fish and wildlife habitat. For Alameda Creek, the PEIR should specifically discuss how the SFPUC's dams and diversions contribute to ongoing violations of CA Fish and Game Code 5937, past and present damage to fish habitat and runs, and the potential for future take of federally listed steelhead and rainbow trout. The WSIP should feature projects and funding to improve freshwater flows for affected stream reaches in the Alameda Creek watershed, as well as in the watersheds of Pilarcitos Creek and the Tuolumne River, to support the needs of wildlife and recreation.

Calaveras Dam Replacement and Alameda Creek Fishery Enhancement Project, Project SV-2

Part of the stated purpose and description of this project should be to keep native fish populations (including those downstream of Calaveras Dam and the Alameda Diversion Dam, and in Calaveras Reservoir) in good condition, and to restore habitat for anadromous steelhead trout in Alameda Creek. The project should include:

- increased stream flows from Calaveras Reservoir to benefit resident and steelhead trout below the dam;
- removal or re-operation of the Alameda Diversion Dam from upper Alameda Creek or the dam to provide fish passage; and
- reservoir operations designed to protect the landlocked reservoir trout population in Calaveras Reservoir.

The so-called "Alameda Creek Fishery Enhancement Project" has been incorporated into the Calaveras Dam Replacement Project. This project involves construction of an unneeded rubber water recapture dam in the Sunol Valley, at a cost of \$17.5 million. The proposed recapture facility is not a legitimate enhancement project, as it has no benefit for native fish and wildlife and the facility itself will likely degrade aquatic habitat in Alameda Creek. The minimum flows contemplated for release (6,300 af per year) would be met by natural stream flow in most years, requiring the SFPUC to release little or no flows. These flows would be recaptured and provide no benefit for anadromous fish. A more meaningful flow release schedule should be included as part of the project and will likely be required to correct existing violations of CA Fish and Game Code 5937 and to prevent future take of federally listed trout. The proposed recapture facility should be stricken from the project and should not be built. This project currently includes an attempt to divert more water from Alameda Creek, a blatant water grab that will degrade rather than restore Alameda Creek.

Additional 40 mgd Treated Water Supply, Project SV-3 and Sunol Valley WTP, Project SV-6

These projects would allow the SFPUC to increase the rate and amount of water that could be removed and treated from Calaveras Reservoir. Increased withdrawals from Calaveras Reservoir could obviously have an impact on the reservoir trout population. The new treated water reservoir would have a footprint of over 5 acres, and would likely affect habitat for listed species in the Sunol Valley. The addition of this large reservoir would also increase the risk of chemical spills in Alameda Creek. Mitigations for all environmental impacts should be included in the project.

Alternatives analysis

The PEIR should consider project alternatives that:

- provide greater conservation programs and increased water reclamation rather than expanding the capacity of the water system;
- do not expand the capacity of the water system to withdraw water from the Tuolumne River and Alameda Creek; and
- improve freshwater flows for affected stream reaches in Alameda Creek and other SFPUC watersheds.

Evaluation of environmental impacts

Under 14 California Code of Regulations § 15168(c)(1), the PEIR must discuss all of the environmental impacts of the WSIP. The PEIR must consider the impacts of:

- increasing system capacity on the Alameda Creek watershed, the Tuolumne River watershed, and the Peninsula watershed;
- increased withdrawals from Alameda Creek and the Tuolumne River on aquatic habitat and on water quality;
- the Calaveras Dam replacement on aquatic and terrestrial habitat and listed species above and below the reservoir;
- the proposed Alameda Creek Fisheries Enhancement Project on aquatic habitat and listed species in Alameda Creek; and
- enlarging the capacity of the Sunol Valley Water Treatment Plant on trout habitat in Calaveras Reservoir and on the availability of stream flow in Alameda Creek to meet the needs of wildlife and recreation.

The following studies are needed to evaluate the impacts of WSIP projects on Alameda Creek:

- a restoration plan which determines the flows needed for maintaining native fish in good condition and for restoring steelhead trout habitat in Alameda Creek;
- surveys for presence of endangered species and suitable habitat on all SFPUC lands and streams in the Alameda Creek watershed affected by the WSIP; and
- an assessment of the feasibility and impacts of altering operation of or removing the Alameda Diversion Dam.

Sincerely,

Jeff Miller

Director, Alameda Creek Alliance