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November 8, 2005

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

**Re: Scoping Comments on Calaveras Dam Replacement Project**

These are the comments of the Alameda Creek Alliance (ACA) on the SFPUC's proposed Calaveras Dam Replacement Project (Project). The ACA is a community watershed group dedicated to the protection and restoration of the natural ecosystems of the Alameda Creek watershed. The ACA has over 730 members that live in the watershed and has been advocating for restoration of steelhead trout since 1997.

The ACA supports the SFPUC's efforts to make needed repairs and earthquake safety retrofits to its water system. However, given that the Calaveras Dam Replacement Project is a major infrastructure project with significant environmental impacts, the ACA can only support this project if specific environmental benefits and adequate mitigations are provided as part of the project. The ACA proposes that the following elements be included in the Project:

- avoidance of impacts to listed species and their habitat, and full and meaningful mitigations if such impacts cannot be avoided;
- anadromous fish passage (including upstream migration of adult steelhead and out-migration of steelhead smolts) at Calaveras Dam and Alameda Diversion Dam;
- sufficient stream flows to meet the SFPUC's legal responsibilities to keep native fish and wildlife in Alameda Creek in good condition, and for spawning, rearing and out-migration of steelhead trout;
- restored ecosystem function below Calaveras Dam and the Alameda Diversion Dam;
- abandon construction of the proposed rubber dam and recapture facility in Sunol Valley; and
- reservoir infrastructure and operations to protect the trout population in Calaveras Reservoir.

**Alternatives Analysis**

The EIR for the Project must evaluate a reasonable range of project elements or alternatives for avoidance of impacts to listed species and their habitat, for providing anadromous fish passage, for releasing water from SFPUC dams, for restoring ecosystem function, and for protecting reservoir trout, including the project elements and alternatives raised in this letter.

## **Project Description**

A major failing of the proposed Project is the description of the purpose of and need for the Project. Stewardship and restoration actions need to be included in the Project and the project description. The Project should acknowledge the SFPUC's stewardship obligations, legal requirements for environmental protection, and the public's desire for restoration actions. The Project should also include and fully describe adequate mitigations for both the physical footprint impacts and the ongoing operational impacts of the proposed project. Replacement and operation of Calaveras Dam (including operation of the Alameda Diversion Dam) is a major infrastructure project that will have significant and ongoing environmental impacts in the Alameda Creek watershed.

Measures A and E, the legislation authorizing the financing for the SFPUC's Water System Improvement Program (WSIP), were approved by San Francisco voters in November of 2002. These measures made it clear that stewardship and environmental restoration were to be part of WSIP projects, such as the Calaveras Dam Replacement Project. 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 WSIP improvements; "include, but are not limited to, water delivery and seismic improvements, water quality improvements, water supply improvements, and watershed and environmental improvements." 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 to project-specific scopes.

Thus, part of the stated purpose and description of the Calaveras Dam Replacement Project should be to keep native fish populations, including those downstream of Calaveras Dam, downstream of the Alameda Diversion Dam, and in Calaveras Reservoir, in good condition; to restore lost habitat for anadromous steelhead trout in Alameda Creek; and to restore ecosystem function below SFPUC diversions.

## **Mitigation and Restoration Elements**

When deciding on mitigation and restoration elements for the Project, the SFPUC must keep in mind the following factors, which should be discussed in the EIR for the Project:

The proposed Project is not just replacement of a dam, but also operation of that dam. Operation of Calaveras Dam is going to have significant environmental consequences, including continuing to block access for ocean-run fish to the best steelhead spawning and rearing habitat in the watershed, impounding stream flows, and blocking essential physical processes such as sediment transport, channel scouring, and woody debris recruitment.

The operation of Calaveras Dam includes the operation of the Alameda Diversion Dam (ADD), which diverts water for storage in Calaveras Reservoir. Thus the Project must include mitigation and restoration elements for the ADD.

The proposed Project will have environmental impacts beyond the physical footprint of the dam, the reservoir, access roads, and borrow, spoils and staging areas. Mitigations for the Project should include mitigations for impacts to these physical areas, as well as mitigations for impacts to Alameda and Calaveras Creeks downstream of the dams.

The operation of the existing Calaveras Dam and the ADD has for decades violated California Fish and Game Code §5937, which requires dam owners to release enough water to keep downstream fish populations in good condition. The SFPUC impounds or diverts natural stream flow behind these dams without minimum flow releases to benefit fish and wildlife habitat or native vegetation downstream of the dams. The operations of these dams contributed to the past extirpation of anadromous fish, and current operations leave inadequate flow in Alameda Creek below the dams to maintain resident trout populations in good condition. Fully 86% of the stream flow in the watershed area tributary to Alameda Creek in the Sunol Valley is diverted by the SFPUC for water supply, reducing available habitat and harming native fish populations. The operation of the replacement Calaveras Dam and the ADD, even with the proposed flow releases contemplated in the Notice of Preparation (NOP) for the Project, will likely continue to violate §5937 and may also result in unauthorized take of listed steelhead and rainbow trout, as discussed below.

The SFPUC at one point notified the Alameda Creek Fisheries Restoration Workgroup that the removal of Niles and Sunol Dams from Alameda Creek in Niles Canyon may be used as mitigation for the Calaveras Dam Replacement Project. While these dam removals will clearly benefit anadromous fish migration, Niles and Sunol Dams are being removed by the SFPUC primarily due to public safety and liability concerns and to avoid “take” liability under the Endangered Species Act, as these dams are potential barriers to migrating steelhead trout. The removal of Niles and Sunol Dams is in no way mitigation for the environmental impacts of the proposed replacement and operation of Calaveras Dam.

### **Impacts of the Proposed Project**

The NOP for the Project noted the potential for habitat loss and disturbance for a number of special status species and sensitive habitat types found around Calaveras Reservoir. The Berkeley kangaroo rat (*Dipodomys heermanni berkeleyensis*), which has recently been re-discovered by the East Bay Regional Park District on ridges east of Calaveras Reservoir,<sup>1</sup> should be added to this list. The NOP noted the potential listing of the trout population in the Calaveras Reservoir watershed. Due to potential impacts to habitat downstream of SFPUC dams as a result of the Project, existing rainbow trout and future steelhead trout populations in Alameda Creek below Calaveras Dam and the ADD should also be included.

Prior to the EIR, the SFPUC should conduct surveys to determine if any listed, rare, or unusual plants will be affected by the Project. Surveys should follow the California Native Plant Society (CNPS) *Botanical Survey Guidelines*. The East Bay Chapter of the CNPS should be contacted to determine if there are any special status plant species that are known to occur or potentially occur in the Project area for which impacts should be evaluated and the species protected under CEQA. The SFPUC should contact Dianne Lake, the Unusual Plants Coordinator for the East Bay Chapter of the CNPS, at (510) 741-8066 or diannelake@yahoo.com.

The EIR for the Project must evaluate all of the environmental impacts that may result downstream of the project due to the rebuilding of Calaveras Dam. As discussed below, these impacts include impeding fish migration, preventing gene flow between trout populations, impounding stream flows, disrupting ecosystem function, and reducing habitat quality below these dams.

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<sup>1</sup> J. DiDonato, EBRPD, pers. comm., 2005.

## **Avoid Impacts to Listed Species**

The NOP notes that the Project has the potential to impact sensitive habitat types, including sycamore alluvial woodland, callippe silverspot butterfly habitat, and bay checkerspot butterfly habitat, and impact special status species, including rainbow trout, Sacramento perch, Pacific lamprey, California red-legged frog, foothill yellow-legged frog, California tiger salamander, Alameda whipsnake, most beautiful jewel flower, Cooper's hawk, Townsend's western big-eared bat, golden eagle, great blue heron, sharp-shinned hawk, and western pond turtle. The Berkeley kangaroo rat should be added to this list. For the environmental review for the Project, the SFPUC should conduct protocol-level species and habitat surveys for all of these listed species and sensitive habitats, within the reasonable vicinity of the Project area. The results of these surveys and maps clearly showing the locations of habitats and species should be published as part of the draft EIR for the Project.

All infrastructure and the direct footprint of the proposed Project should avoid impacts to these species and habitats. All haul roads and areas used for borrow, spoils disposal, stockpile or staging should avoid habitat for and impacts to these species. If any haul roads, construction areas or any other temporary or permanent infrastructure for the Project must be located such that they directly affect these habitats or species, the environmental review for the Project should identify these areas and specify why the habitat cannot be avoided, including an analysis of alternative locations. If such impacts cannot be avoided, the Project must include full and biologically meaningful mitigations for the affected habitat or species. The potential indirect impacts to these species and habitat types due to traffic, noise, lights, dust and human disturbance generated by the Project must be evaluated during the EIR.

## **Fish Passage at Calaveras Dam**

The operation of Calaveras Dam without fish passage violates California Fish and Game Code §5901, which makes it illegal to maintain any device which prevents or impedes the passing of fish up and down stream. The construction of Calaveras Dam and Reservoir blocked the upstream and downstream movements of both resident and transient fishes, including steelhead trout.<sup>2</sup> The Calaveras watershed trout population appears to be descended from native steelhead populations isolated behind the dam.<sup>3</sup> Calaveras Dam blocks steelhead access to the upper Calaveras watershed including its tributaries Arroyo Hondo, Smith, and Isabel Creeks, likely the best historical steelhead spawning and rearing habitat in the entire Alameda Creek watershed. Calaveras Dam prevents gene flow between trout populations above and below the reservoir, and may be affecting the long-term genetic viability of reservoir and stream populations.

The Calaveras Dam Replacement Project should include infrastructure and provisions for fish passage around the new dam, both in-migration of adult ocean-run steelhead and out-migration of juvenile steelhead smolts and fry. The fish passage element of the Project should ensure that once fish passage projects in lower Alameda Creek are completed or when steelhead are moved upstream under permit, future adult ocean run steelhead trout from San Francisco Bay are able to bypass the rebuilt Calaveras Dam to reach spawning and rearing habitat in lower Arroyo Hondo. The Project should also ensure that juvenile steelhead reared in Arroyo Hondo can out-migrate

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<sup>2</sup> San Francisco Public Utilities Commission (SFPUC). 2005. Population Size Estimates for Adult Rainbow Trout (*Oncorhynchus mykiss*) in San Antonio and Calaveras Reservoirs. Technical Memorandum No. 2-04-006, October 2005. Water Quality Bureau, Sunol, CA.

<sup>3</sup> Gunther, A. J. et al. 2000. An Assessment of the Potential for Restoring a Viable Steelhead Trout Population in the Alameda Creek Watershed. Prepared for the Alameda Creek Fisheries Restoration Workgroup.

Nielsen, J. L. 2003. Population Genetic Structure of Alameda Creek Rainbow/Steelhead Trout - 2002. Final Report Submitted to Hagar Environmental Science December 4, 2003. US Geological Survey, Alaska Science Center, Anchorage, Alaska.

downstream past Calaveras Dam to Alameda Creek or the San Francisco Bay. Lack of successful out-migration is a major limiting factor for steelhead populations on other California rivers. The chances of restoring a viable steelhead population to the Alameda Creek watershed will be substantially greater if the habitat and trout population in Arroyo Hondo is connected with the Bay. This connectivity and opportunity for ocean-run fish and Calaveras fish to mix will provide genetic variability for both the reservoir population and Alameda Creek steelhead populations.

The ACA proposes several options for providing fish passage at Calaveras Dam, including:

- constructing a bypass canal around the dam;
- constructing a fish ladder at the dam; or
- trapping fish above and below the dam and transporting them around the dam.

A bypass canal connecting Arroyo Hondo with Calaveras Creek or Alameda Creek below the dam may be the preferred option given the height of the dam and the difficulty for fish to negotiate the slack water habitat of the reservoir. A bypass canal could allow in-migrating adult steelhead to reach spawning habitat in lower Arroyo Hondo and allow steelhead smolts and fry to move downstream into Alameda Creek or continue downstream to the San Francisco Bay. Migratory flows in the bypass canal could meet any downstream flow requirement for Calaveras Dam. Construction of the canal could be accomplished while earth is being moved for temporary haul roads, borrow pits, and spoils areas around the reservoir.

A fish ladder at Calaveras Dam could provide for fish passage and carry flow releases, but may be less desirable due to the height of the dam, the constriction of the Calaveras Creek gorge below the dam, and the slack water pool in the reservoir. Juvenile steelhead would have to negotiate through Calaveras Reservoir to find the upstream entrance of the fish ladder. Trapping fish and hauling them around the dam would be the least desirable solution, as it would require more intensive intervention, management and monitoring, as well as construction of facilities to collect fish for both upstream and downstream migrations.

As an additional Project element, to improve steelhead smolt migration, the SFPUC should conduct annual summer fish rescue operations in tributaries to both Calaveras and San Antonio Reservoirs. Juvenile steelhead trout are trapped and perish each summer as isolated pools in these tributaries dry up. Juvenile fish could be easily and inexpensively rescued from these tributaries and moved downstream to suitable rearing habitat in Alameda Creek below the dam, furthering the restoration of a steelhead population below the dams.

The EIR for the Project should evaluate all of these and any other feasible fish passage options.

### **Fish Passage at Alameda Diversion Dam**

The operation of the ADD is a part of the proposed Project, as the ADD is and will be used to divert Alameda Creek stream flow for storage in Calaveras Reservoir. The EIR for the Project must discuss the operation of the ADD. The operation of the ADD without fish passage violates California Fish and Game Code §5901, which makes it illegal to maintain any device which prevents or impedes the passing of fish up and down stream. The ADD blocks the upstream and downstream movements of both resident and transient fishes, including resident rainbow trout. Once fish passage projects in lower Alameda Creek are completed or when steelhead are moved upstream under permit, the ADD will block upstream and downstream migration of steelhead trout.

Operation of the ADD not only affects fish migration past the ADD, but also through Little Yosemite, by diverting the majority of the annual flow of upper Alameda Creek. Reducing the frequency of high flow periods downstream of the ADD reduces fish passage opportunities through Little Yosemite.<sup>4</sup> Operation of the ADD also influences instream flow, aquatic habitat suitability, and sediment transport in Alameda Creek below the dam. Operation of the ADD affects resident trout below the dam currently proposed for federal listing.

Two options for providing fish passage at the ADD include either complete removal of the dam or building a fish ladder at the dam, installing a fish screen at the diversion, and providing bypass flows for fish migration. The ACA recommends complete removal of the ADD as the preferred alternative, since there would be no maintenance or operation required in the future and complete removal would allow for restoration of a natural stream channel. The ACA believes the SFPUC does not have a valid water right to legally divert of the majority of upper Alameda Creek stream flow at the ADD. Recently, 68 Bay Area conservation organizations representing tens of thousands of Bay Area residents sent the SFPUC a letter calling for the removal of the ADD. Constructing a fish ladder and installing fish screens would provide fish passage, but may cost as much as removal of the dam, and would require ongoing operational, monitoring and maintenance costs, and would add more artificial channel and infrastructure to a relatively pristine section of the creek. The EIR for the Project should evaluate these and any other feasible fish passage options.

### **Instream Flows**

Since 1997, the ACA has been requesting that the SFPUC release sufficient stream flow from SFPUC dams to keep native fish downstream in good condition and to allow spawning, rearing, and out-migration of steelhead trout. Recently, 68 Bay Area conservation organizations representing tens of thousands of Bay Area residents sent the SFPUC a letter requesting these flows. Minimum flow releases would also benefit riparian vegetation and periodic scouring flows from Calaveras Reservoir would help prepare spawning gravels downstream and reduce summer algal blooms and overgrowth by cattails. Enhanced stream flows would provide additional deep-water habitat in upper Alameda Creek, identified by the SFPUC as a factor limiting trout restoration. Populations of native resident rainbow trout below the dams, in Alameda Creek and its tributaries in the upper Sunol Valley, are very small, with few to no trout found in most reaches in dry years.<sup>5</sup> These populations are severely constrained by lack of rearing habitat and high summer temperatures,<sup>6</sup> due to lack of minimum flow releases from Calaveras Reservoir. Flow releases are required to keep these fish populations in good condition.

The SFPUC, as part of a Memorandum of Understanding (MOU) signed with the California Department of Fish and Game (CDFG) in 1997, promised to restore minimal flows to approximately five miles of Alameda Creek, but to date has not released water for this purpose. The NOP describes two components of the Project: “replacement of the existing dam at Calaveras Reservoir to meet seismic safety and delivery/drought reliability requirements, and

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<sup>4</sup> Gunther, A. J. et al. 2000. An Assessment of the Potential for Restoring a Viable Steelhead Trout Population in the Alameda Creek Watershed. Prepared for the Alameda Creek Fisheries Restoration Workgroup.

<sup>5</sup> San Francisco Public Utilities Commission. 2000, 2001, 2002, and 2004. Alameda Creek aquatic resource monitoring reports: summer and fall 1998; summer and fall 1999; 2000; 2001; and 2002. Prepared by SFPUC Water Quality Bureau, Sunol, CA.

<sup>6</sup> San Francisco Public Utilities Commission. 2000, 2001, 2002, and 2004. Alameda Creek aquatic resource monitoring reports: summer and fall 1998; summer and fall 1999; 2000; 2001; and 2002. Prepared by SFPUC Water Quality Bureau, Sunol, CA.

Hanson Environmental, Inc. 2002. Air and water temperature monitoring within Alameda Creek. Draft report submitted to the San Francisco Public Utilities Commission. March 30, 2002.

operation of Calaveras Reservoir to release up to 6,300 acre-feet per year of water to Calaveras and Alameda Creeks for enhancement of fisheries and the other natural resources of the creeks.”

The MOU agreed upon the releases referenced in the NOP of less than 6,300 acre-feet (af) of water annually, flows intended to benefit a resident rainbow trout population in 5 miles of stream, and minimal enough so as to be of questionable value for anadromous fish. These flows were not intended to meet the habitat needs of anadromous fishes such as steelhead trout, salmon, or lamprey. The MOU also allows these flow releases to be recaptured downstream in the vicinity of the Sunol Valley Water Treatment Plant. It is important to note that the MOU flows are required minimum stream flows at the confluence of Calaveras and Alameda Creeks, not flows that must be released from Calaveras Reservoir. During most winters, the flows required under the MOU from November 1 through March 15 will be met by natural stream flow in Alameda Creek, thus requiring little or no flow releases from Calaveras Reservoir by the SFPUC. For normal and wet water years, summer releases would be the only truly enhanced stream flow, so that in most years the SFPUC would release only 3,150 af under the proposed Project. The EIR for the Project must discuss the rationale and scientific basis for the proposed flow schedule and whether these flows are adequate for all life stages of anadromous fish.

The MOU does not address Fish and Game Code §5937 violations for fish between the ADD and the confluence of Calaveras and Alameda Creeks. Also, the National Marine Fisheries Service (NMFS) has proposed listing resident rainbow trout below the ADD and Calaveras Dam as threatened species under the Endangered Species Act, with a final listing determination due in December of 2005. The ACA has called upon the SFPUC to scrap the 1997 MOU flows, and replace them with adequate flows for steelhead trout and to meet the SFPUC’s §5937 obligations. NMFS and CDFG are currently meeting with the SFPUC to revise the 1997 MOU and the minimum flows. Under the proposed Project, even with the proposed flow releases contemplated in the NOP, operation of both dams will likely cause violations of §5937 and unauthorized take of listed trout populations. The Project must include elements that address these violations and the potential for unauthorized take.

Flows studies to determine the habitat needs of steelhead trout and other native fish downstream of the SFPUC dams must be completed and included in the EIR for the Project. The Alameda Creek Fisheries Restoration Workgroup, with SFPUC involvement, is currently working on an agreement for flows studies to determine this information. The ACA has also previously asked the SFPUC to identify the average annual natural stream flow at the confluence of Calaveras and Alameda Creeks, to determine whether these flows meet or surpass the proposed minimum flows in the 1997 MOU. The ACA has also asked for a record of the amount and timing of water diversions at the ADD. The SFPUC has yet to supply this information. This information must be provided as part of the EIR for the Project, to determine the ecological benefit of the proposed releases of less than 6,300 af annually.

The NOP for the Project contemplates releasing water for environmental purposes from Calaveras Dam through a new 12” pipe and a 72” low-volume cone valve. The EIR for the Project should identify whether this cone valve would be able to release flows adequate for steelhead trout restoration, including flows needed for migration. Any infrastructure built for water releases for environmental purposes should accommodate the full range of flows that may be required for anadromous fish. Also, periodic scouring flows may be required in Alameda Creek below Calaveras Dam to maintain ecosystem function and maintain suitable trout habitat, as discussed below. The EIR for the Project should identify how such flows would be released.

## **Restore Ecosystem Function**

Calaveras Dam and the ADD interrupt ecosystem function in Alameda Creek, by blocking transport of sediment (including fish spawning substrate) and woody debris, and reducing scouring flows. The EIR should evaluate a range of alternatives for restoring ecosystem function below these dams, including:

- transporting sediment from above Calaveras Dam and/or the ADD to Alameda Creek below the dams through a bypass canal, fish ladder or discharge pipe, with an emphasis on transporting suitable spawning substrate;
- capturing and hauling spawning substrate from above Calaveras Dam and/or the ADD to Alameda Creek below the dams;
- periodically releasing scouring flows from Calaveras Reservoir adequate to maintain suitable spawning habitat below the dam; and
- placing suitable and appropriate woody debris in Alameda Creek below the dams to enhance spawning and rearing habitat.

## **No Dam Enlargement**

The SFPUC proposes to rebuild Calaveras Dam with a wider core that could accommodate enlargement of the dam in the future. The NOP for the Project states that although the “SFPUC does not reasonably foresee the need for a larger dam beyond one that restores the reservoir's historical capacity; the dam would be designed to allow potential future reuse of dam components without requiring otherwise more extensive dam removal and rebuilding if an enlargement were ever undertaken in the future.” Since the SFPUC claims there is no foreseeable need for expanding the dam in the future, the design and engineering of this project should be restricted to the 96,850 af of storage capacity identified as appropriate for replacing the existing dam. Engineering the structure for later expansion will increase the threats to habitat in the two Regional Wilderness Areas adjacent to the dam, and is contrary to the SFPUC’s adopted stewardship policy.

## **No Recapture Facility**

The NOP for the Calaveras Dam Replacement Project does not mention the SFPUC proposal to construct a water recapture facility (including a rubber dam) in the Sunol Valley, the so-called “Alameda Creek Fishery Enhancement Project.” However, the NOP for the Programmatic EIR for the WSIP indicates the “Enhancement Project” will be a part of the Calaveras Dam Replacement Project. The EIR should clarify whether or not this is an element of the proposed Project.

The “Enhancement Project” involves construction of an unneeded rubber dam and recapture facility in the Sunol Valley, at an estimated cost of \$17.5 million. The SFPUC has insisted on recapture of the water to be released under the 1997 MOU. 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 Alameda Creek Fisheries Restoration Workgroup does not have consensus that the rubber dam project is essential to the steelhead restoration, and has not listed it as an essential action in its *Draft Steelhead Restoration Action Plan for the Alameda Creek Watershed*.

The proposed rubber dam would create a seasonal impoundment in a stream section that is currently relatively pristine. A dam and water impoundment at this location could affect fish

passage, even with a fish ladder. The impoundment would also increase water temperature and create habitat favourable for predatory fish and bullfrogs. The recapture facility would have impacts on listed and sensitive species known to inhabit the “Enhancement Project” area, including rainbow trout, Pacific lamprey, California red-legged frog, California tiger salamander, and western pond turtle.

The “Enhancement Project” also includes an attempt to illegally divert more water from Alameda Creek, a blatant water grab that will degrade rather than restore Alameda Creek. The 1997 MOU (Section 4.4) memorializes a supposed SFPUC water right to recapture not just “the amount of water released as part of the Calaveras Reservoir stream release and recapture program” but also “historic annual diversions at the Sunol Filter Galleries.” It is questionable whether the SFPUC has a valid water right to renew these diversions since they have discontinued the filter gallery diversions and do not have an established beneficial use.

Recently, 68 Bay Area conservation organizations representing tens of thousands of Bay Area residents sent the SFPUC a letter requesting that the agency abandon efforts to construct the recapture facility and rubber dam. The “Alameda Creek Fishery Enhancement Project” should not be a part of the Calaveras Dam Replacement Project. If the “Enhancement Project” is included in the Project the EIR must fully evaluate all the potential environmental impacts, and should evaluate a range of alternatives to the recapture facility, including:

- not recapturing any of the water released from Calaveras Reservoir;
- allowing any water released from Calaveras Reservoir to be recaptured further downstream; or
- recapturing water released from Calaveras Reservoir at another location or by means other than a rubber dam.

### **Protect Reservoir Fish**

The Project should include reservoir infrastructure and operations to protect the landlocked reservoir trout population in Calaveras Reservoir. The NOP notes that “a new intake tower connecting to an existing drain and three water inlet adits” will be constructed in Calaveras Reservoir. Any of these adits with the potential to divert or entrain juvenile trout must be screened according to NMFS criteria to protect juvenile trout. Also, the SFPUC recently completed the Calaveras Dam Oxygenation Project, to protect water quality and fish habitat in the reservoir. The oxygenation equipment should be used to expand suitable summer trout habitat in the reservoir. Installation of fish screens and operation of the oxygenation equipment to benefit fish should be evaluated in the EIR for the Project.

The Alameda Creek Alliance looks forward to working with the SFPUC and the S. F. Planning Department to incorporate adequate stream flow releases, fish passage, and other restoration elements for Alameda Creek that will allow us to support the Project and help the environmental review and permitting process to move forward quickly and cooperatively.

Sincerely,

Jeff Miller

Director, Alameda Creek Alliance

cc: National Marine Fisheries Service  
California Department of Fish and Game  
U. S. Army Corps of Engineers  
San Francisco Public Utilities Commissioners  
San Francisco Board of Supervisors  
Alameda Creek Fisheries Restoration Workgroup  
Bay Area Water Stewards  
SFPUC Water Supply and Treatment Division  
SFPUC Land and Resources Management Section