



AMERICAN FISHERIES SOCIETY

California-Nevada Chapter

<http://www.afs-calneva.org/Home.htm>



December 18, 2009

Bill Wycko
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Dear Mr. Wycko,

Comments on Calaveras Dam Replacement Project

I am writing on behalf of the California-Nevada Chapter of the American Fisheries Society (AFS). The American Fisheries Society, founded in 1870, is the oldest and largest professional fishery organization in North America. Our membership includes biologists, aquaculturists, academics, consultants, and others committed to science-based fisheries management and conservation. The Chapter consists of 425 members from California, Nevada and other states. AFS has an international reputation as the premier science-based organization dealing with fisheries, and collectively we speak for this resource at every level of government. Because the AFS relies on peer-reviewed science, the public at large knows that when AFS makes a presentation on any particular issue there is no hidden political agenda; our focus is on *what is best for the resource*. An important aspect of our mission is to promote progress toward sustainable aquatic ecosystems and thus, fisheries. We support protecting fishery resources and their habitat for future generations to enjoy.

Alameda Creek is a regional asset with statewide significance for potential restoration of steelhead trout populations in the greater San Francisco Bay Area. Due to ongoing restoration efforts over the past decade, Alameda Creek is becoming a stream restoration success story. Numerous fish passage projects downstream of SFPUC dams have been completed since 2001, and several major fish ladder and dam removal projects will be completed by the time Calaveras Dam is rebuilt. The completion of these projects will allow anadromous fish to access approximately 20 miles of suitable spawning and rearing habitat in upper Alameda Creek for the first time in almost half a century.

The California-Nevada Chapter conditionally supports the SFPUC rebuilding Calaveras Dam as quickly as possible to benefit public safety, ensure a reliable water supply, and enhance fish habitat. However, before we can fully support the project, the major issue that needs to be resolved is how the SFPUC will operate the water system once the dam is rebuilt, and whether operations will allow for the restoration of anadromous steelhead trout below the dam.

San Francisco's water system can and should be operated in a manner that provides adequate stream flow for native anadromous salmonids. In addition, State Fish and Game Code Section 5937 requires "the owner of any dam to allow sufficient water at all times through a fishway, or in the absence of a fishway, allow sufficient water to pass

over, around or through a dam, to keep in good condition any fish that may be planted or exist below the dam.”

The Federal Endangered Species Act also requires the SFPUC to provide sufficient water for federally protected steelhead trout. Providing adequate flows below a dam to benefit native fish are part of the environmental responsibilities of any water agency with major dams.

After all of the barriers to upstream adult steelhead migration in the lower watershed are removed, we recommend that flows for steelhead be provided by SFPUC to enable steelhead to reach the upper watershed. The proposed streamflow releases in the EIR are designed for resident rainbow trout, not migratory anadromous steelhead trout, and should address the habitat needs of steelhead trout. Minimum stream flows downstream of SFPUC dams should be consistent with those determined by State and federal regulatory agencies, namely, the National Marine Fisheries Service, California State Dept. of Fish and Game, and State Water Resources Control Board.

The project should also mitigate for the impacts of the Calaveras Dam and Alameda Diversion dam by providing for migratory fish passage at the Alameda Diversion Dam and Calaveras Dam.

Because of Alameda Creek’s statewide significance to the anadromous fisheries of this State, we strongly recommend that the restoration and enhancement of steelhead runs in Alameda Creek below Calaveras Dam be included as a primary goal; if not, at least a secondary goal of the proposed project.

We look forward to working with the SFPUC to ensure that the final EIR and future operating plans are consistent with steelhead recovery needs, and Federal and state environmental laws.

Sincerely,

A handwritten signature in dark ink that reads "Michelle Workman". The signature is written in a cursive, flowing style.

Michelle Workman, President
California-Nevada Chapter, American Fisheries Society

cc: Robert Smith
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U.S. Army Corps of Engineers
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