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Comments on Calaveras Dam Replacement Project

The undersigned 46 Bay Area conservation organizations submit these comments on the Draft Environmental Impact Report (DEIR) for the San Francisco Public Utilities Commission (SFPUC) Calaveras Dam Replacement Project in the Alameda Creek watershed.

Alameda Creek is a regional asset with significance for restoration of steelhead trout 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.

Our organizations support 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 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 steelhead trout and salmon below the dam. San Francisco's water system can and should be operated in a sustainable manner that provides adequate stream flow for native fish and wildlife.

Our organizations believe that numerous conservation, recycling, and groundwater projects can be implemented that will make up the water needed for healthy fisheries in Alameda Creek, the Tuolumne River, and the Peninsula watersheds managed by the SFPUC.

The SFPUC diverts 86 percent of the stream flow of upper Alameda Creek. Future SFPUC dam operations will impact water flow, habitat suitability, and fish passage far downstream. The operation of Calaveras Dam should adhere to the SFPUC's watershed stewardship policy, and state Fish and Game Codes require the SFPUC to provide bypass flows to keep native fish downstream of its dams in good condition. The Endangered Species Act also requires the SFPUC to provide sufficient water for federally protected steelhead trout. Providing adequate flows for native fish and wildlife are part of doing business for any water agency with major dams.

We have the following concerns about the DEIR for the Calaveras Dam Replacement Project:

- It concludes that many significant impacts on steelhead trout and other listed species are "not significant" or mitigated to a "less than significant" level based on inadequate analysis and mitigations;
- It downplays and misstates the impacts of SFPUC dam operations on water flow, habitat suitability, and fish passage further downstream;
- It wrongly asserts that diverting all winter and spring flows from upper Alameda Creek at the Alameda Diversion Dam under 650 cfs flow will benefit fish because it will provide a "a more predictable and stable flow";
- Flows for steelhead will be provided only if steelhead occur in the upper watershed in the absence of such flows;
- The environmental baseline covers years during which conditions for fish were poor and partially during a drought, leading the EIR to conclude that modest improvements in flow conditions are adequate to determine "no impact," "less than significant," or "beneficial" impacts;

- It does not analyze the impacts of Calaveras and Alameda Diversion dams with regards to blocking spawning and rearing habitat for steelhead or impairing flows in Alameda Creek, nor does it fully assess changes to downstream channel morphology and habitat;
- The proposed stream flow releases are designed for resident rainbow trout, not migratory fish, and do not address the habitat needs of chinook salmon;
- The proposed mitigations for what will be significant construction impacts on habitat for numerous endangered species are meager and inappropriate; and
- There are no meaningful mitigations for greenhouse gas emissions from the project.

We propose the following changes be made to the EIR and the project, in order to move the rebuild project forward quickly and without conflict:

- Minimum stream flows downstream of SFPUC dams should be consistent with those proposed by the federal regulatory agency, the National Marine Fisheries Service;
- Winter and spring flows should be adequate to provide for adult attraction and upstream passage and for smolt out-migration, and fall flows should address the habitat needs of chinook salmon;
- Downstream flows should mimic the natural hydrograph of the stream;
- The project should mitigate for the impacts of the Calaveras and Alameda Diversion dams in blocking spawning and rearing habitat for steelhead, impairing flows in Alameda Creek, and changing downstream habitat;
- The project should provide for some form of migratory fish passage at the Alameda Diversion Dam and Calaveras Dam;
- Mitigations for construction impacts should be on private land, not on land already protected by the SFPUC; and
- Greenhouse gas emissions from construction should be fully mitigated, such as by purchasing approved carbon offsets.

San Francisco should be taking the lead in restoring steelhead trout to Alameda Creek as part of this project. We look forward to working with the SFPUC to ensure the final EIR and future operating plans are consistent with steelhead recovery, and federal and state environmental laws.

Sincerely,

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