



Alameda Creek Alliance

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March 16, 2005

Alameda HCP
Land and Resources Management Section
S. F. Public Utilities Commission
1657 Rollins Road
Burlingame, CA 94010

Re: HCP Grazing Issues

I attended the February 10, 2005 meeting covering grazing issues for the SFPUC's Alameda Creek watershed Habitat Conservation Plan (HCP). Below are the grazing issues the Alameda Creek Alliance (ACA) raised at this meeting. We also have requests below for specific information discussed at the meeting.

- The SFPUC committed to providing a written report for the HCP on the Grazing Management Element of the Alameda Watershed Management Plan; specifically which promised actions and mitigations have been completed, which actions are pending, and a time-line for completion. The SFPUC also committed to providing information on what fencing currently exists within the HCP area, and how old and in what condition that fencing is.
- The ACA requested specific written responses to comments regarding grazing that we raised in our HCP comment letter of 6-30-04 to the SFPUC.
- The ACA requested that the SFPUC solicit comments on HCP grazing issues from the U.S. Fish and Wildlife Service (FWS), National Marine Fisheries Service (NMFS), and California Department of Fish and Game (CDFG) and that these comments be provided to the ACA and others involved in the HCP.
- The ACA requested copies of any studies or data on grazing impacts to listed species or their habitat that are within the HCP area, such as the CA red-legged frog (CRLF) and CA tiger salamander (CTS). East Bay Regional Park District (EBRPD) biologist Joe DiDonato discussed data the EBRPD has collected on CRLF and CTS in ponds within the HCP area and data the Contra Costa Water District (CCWD) has collected on CTS on their lands. The ACA requests that the SFPUC acquire this information from EBRPD and CCWD and make it part of the public record for the HCP. In the absence of specific information on grazing impacts on EBRPD and CCWD lands to listed species such as the CRLF and CTS, the SFPUC should rely upon published peer-reviewed literature and the best scientific information collected by FWS to determine presumed grazing impacts for the HCP.
- The SFPUC and EBRPD committed to fencing cattle out of the entirety of Alameda Creek from Camp Ohlone downstream to Welch Creek. The ACA requested that this fencing be continued downstream through the Garcia Lease below Welch Creek, to protect potential

salmonid spawning and rearing habitat in that area. The ACA also requested that the fencing be aligned to include the lower reaches of all tributary streams to Alameda Creek in the Sunol Valley that are known to support rainbow trout, thus excluding cattle from known or potential trout habitat in the lower reaches of Pirate Creek, Leyden Creek, Welch Creek, Indian Joe Creek, and W-Tree Creek.

- The SFPUC and EBRPD committed to developing 18 off-stream water sources for cattle in conjunction with fencing Alameda Creek. The ACA requests that these water projects not destroy or de-water natural wetlands features such as springs or seeps.
- The SFPUC committed to fencing cattle out of Arroyo Hondo above Calaveras Reservoir. The ACA requested that cattle be excluded from all stream reaches tributary to Calaveras Reservoir that provide known or potential spawning or rearing habitat for adfluvial steelhead trout. The ACA also requests that cattle be excluded from stream reaches in the San Antonio Creek sub-watershed that provide known or potential trout spawning or rearing habitat, including San Antonio Creek below the reservoir, San Antonio Creek above the reservoir, Indian Creek, LaCosta Creek, and potentially Apperson Creek. Cattle in these stream reaches are damaging trout spawning and rearing habitat and have been documented trampling trout redds. NMFS has indicated that cattle should be excluded from these stream reaches.
- The ACA requested that cattle grazing be excluded or seasonally limited to protect; any special-status plants identified by the CA Native Plant Society, CDFG, or FWS as at-risk from cattle grazing; serpentine soil plants; and potential habitat for Bay checkerspot and callippe silverspot butterflies. Exclusionary fencing should capture as many of these habitats as possible while minimizing the total amount of fencing.
- The ACA requests that the SFPUC confirm that the proposed fencing for cattle exclusion in the HCP area (4-strand fencing, bottom wire smooth and 28" from the ground) will effectively exclude cattle and will not interfere with movement of native wildlife such as deer or elk.
- The ACA requests that the SFPUC experimentally eliminate cattle grazing and evaluate alternative vegetation management options in a portion or all of Sunol and Ohlone Regional Wildernesses, within the HCP area. This was proposed in 2003 by the ACA and conservation and flyfishing groups to EBRPD in Alternative W, the alternative land use plan for Sunol and Ohlone. The proposed plan can be found at www.alamedacreek.org under Action Alerts, Sunol/Ohlone Land Use Plan.
- The ACA requests that any grazing monitoring program developed as part of the HCP be based on monitoring ecological values, rather than range management values (i.e. monitor quantity and quality of habitat for listed species, health of listed plant populations, etc., rather than monitoring available forage for cattle, residual dry matter, etc.).

Sincerely,

Jeff Miller
Director, ACA

