



# Alameda Creek Alliance

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August 31, 2007

Paul Maltzer  
Environmental Review Officer  
Sunol Valley Water Treatment Plant Project  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

## Re: Scoping Comments on the Sunol Valley Water Treatment Plant Project

Dear Paul Maltzer:

These are the scoping comments of the Alameda Creek Alliance on the San Francisco Public Utilities Commission's (SFPUC) proposed Sunol Valley Water Treatment Plant (SVWTP) Expansion Project.

The Alameda Creek Alliance is a community watershed group dedicated to the protection and restoration of the natural ecosystems of the Alameda Creek watershed. The ACA has over 1,430 members that live in or near the watershed. The Alameda Creek Alliance has been working to restore steelhead trout and protect endangered species in the Alameda Creek watershed, and specifically in the Sunol Valley, since 1997.

The Notice of Preparation for the SVWTP project notes that the project area potentially contains habitat for a number of special status species, including the Alameda whipsnake (*Masticophis lateralis euryxanthus*), California tiger salamander (*Ambystoma tigrinum californiense*), and California red-legged frog (*Rana aurora draytonii*). The tiger salamander and red-legged frog are documented to occur and are suspected to breed in the vicinity of the project. Other special-status species that are documented to occur in the vicinity of the project are rainbow/steelhead trout (*Oncorhynchus mykiss*), foothill yellow-legged frog (*Rana boylei*), Western pond turtle (*Clemmys marmorata*), and Pacific lamprey (*Lampetra tridentata*). For documentation of the occurrence of these species in the vicinity of the project, see the annual SFPUC Alameda Creek Aquatic Resource Monitoring Reports (1998, 1999, 2000, 2001, 2002, and 2003) published by the SFPUC Water Quality Bureau, and also the California Department of Fish and Game's California Natural Diversity Database.

The project site and much of the vicinity is also designated as critical habitat for the California red-legged frog. See the Federal Register for April 13, 2006 (71 FR 19244-19346). If a federal permit is needed for the SVWTP project, the federal permitting agency, such as the U.S. Army Corps of Engineers, must consult with the U.S. Fish and Wildlife Service to ensure that critical habitat for the red-legged frog is not destroyed or adversely modified by the project.

The SFPUC should ensure that any facilities constructed as part of the SVWTP project are set back at least 100 feet from Alameda Creek to protect the riparian corridor, which is too important for aquatic habitat and water quality to allow loss of any riparian area.

California tiger salamanders are breeding somewhere in the upper Sunol Valley, as evidenced by

a road-killed salamander found in 2001 on Calaveras Road (north of Welch Creek Road) during the breeding season. As part of the environmental review for the SVWTP, the SFPUC should determine where tiger salamanders are breeding in the Sunol Valley, where they are dispersing to after breeding, and potential migration corridors. This information is needed to avoid directly destroying breeding habitat and to ensure that proposed roads and truck traffic do not result in the take of salamanders or disruption of their migration.

The environmental review for the project should also determine whether there are nesting birds in riparian areas adjacent to the proposed project, and the potential for sensitive species of grassland birds such as the western burrowing owl (*Athene cunicularia hypugaea*), golden eagle (*Aquila chrysaetos*), northern harrier (*Circus cyaneus*), white-tailed kite (*Elanus leucurus*), prairie falcon (*Falco mexicanus*), or loggerhead shrike (*Lanius ludovicianus*) to occur, and determine the potential impacts on these species.

The SFPUC had a disastrous chlorine spill at the SVWTP in April of 2002, which killed all fish and aquatic life in Alameda Creek within a reach extending downstream of the SVWTP about 1,000 yards, including an estimated 24-36 lampreys and several frogs of an undetermined species. In May 2002 the SFPUC had another discharge of chlorinated water from the SVWTP. No restoration or mitigation was ever done by the SFPUC to remediate the impacts of these chemical spills.

Given that the SVWTP project includes installation of a new three-million-gallon chlorine contact tank, a new chemical feed facility, two 10,000-gallon ammonia storage tanks, two 13,000-gallon sodium hypochlorite tanks, two 5,000-gallon hydrofluosilicic tanks, and a chemical truck unloading station adjacent to Alameda Creek, the environmental review for the project must discuss what fail-safe measures the SFPUC will implement at the SVWTP to ensure there is never another chemical spill into Alameda Creek. The environmental review must also spell out what containment, spill response, and mitigation measures will be in place if a chemical spill does occur.

The environmental review for the project should discuss whether the expanded SVWTP will increase the capacity for the SFPUC to move treated water through the water system and whether there is potential for an increased rate of water diversion and storage at the Alameda Diversion Dam and Calaveras reservoir as a result of the project.

The proposed project will include construction of a haul road and tunneling of pipelines that will cross Alameda Creek in several locations. The current bridge crossing of Alameda Creek and the dry crossing of the creek just downstream are poorly designed and impact the channel morphology and water quality of Alameda Creek – they are also inadequate to handle the equipment and trucks hauling material from the project. We encourage the SFPUC to replace the existing crossings with a bridge that does not have footings in the active creek channel.

Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Miller", written in a cursive style.

Jeff Miller, Executive Director

cc: Chris Kern, San Francisco Planning Department  
Kent Nelson, SFPUC  
Tim Ramirez, SFPUC  
Josh Milstein, S.F. City Attorney  
Suzanne Gautier, SFPUC  
SFPUC Commissioners  
S.F. Board of Supervisors  
U.S. Fish and Wildlife Service  
California Department of Fish and Game