



Alameda Creek Alliance

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November 5, 2007

Chris Kern or Bill Wycko
Acting Environmental Review Officer
SFPUC San Antonio Backup Pipeline Projects
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Re: Scoping Comments on the SFPUC San Antonio Backup Pipeline Projects

Dear Bill Wycko:

These are the scoping comments of the Alameda Creek Alliance on the San Francisco Public Utilities Commission's (SFPUC) proposed San Antonio Backup Pipeline Projects.

The Alameda Creek Alliance (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 1,450 members that live in or near the watershed. The ACA 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 project discusses the proposed route of the backup pipeline, the location of proposed additional chemical storage and treatment facilities, and installation of a new cone release valve for San Antonio Reservoir.

The new cone valve proposed for a second discharge structure at the base of Turner Dam should be sized to permit release of low and moderate flows to San Antonio Creek to allow for future restoration of steelhead trout and survival of other native fishes in San Antonio Creek and Alameda Creek below the dam.

The San Francisco Public Utilities Commission (SFPUC) currently operates San Antonio Reservoir and Turner Dam with no minimum bypass flows to keep native fish downstream in San Antonio Creek or in Alameda Creek in the reach below the confluence with San Antonio Creek in good condition, in violation of California Fish and Game Code §5937. California Fish and Game Code §5937 requires that the owner of a dam allow sufficient water to pass through a fishway or dam, to keep in "good condition" any fish that may be planted or exist below the dam. The law applies to any dam regardless of when it was built.

The Environmental Impact Report (EIR) for the project should discuss the potential for restoration of steelhead trout and other native fishes below Turner Dam, and the potential stream flows that could be required to maintain fish. The new cone valve must be sized to allow for future low-flow water releases to San Antonio Creek below the dam for this purpose.

Last winter, up to two dozen or more landlocked steelhead trout from San Antonio Reservoir spilled over Turner Dam and were trapped below the discharge facility for over 6 months. Most of these fish likely died, a significant loss of the San Antonio trout population, which was

estimated at only 460 adult trout in 2003 (see SFPUC Technical Memorandum No. 2-04-006, 31 October 2005, Population Size Estimates for Adult Rainbow Trout (*Oncorhynchus mykiss*) in San Antonio and Calaveras Reservoirs). These trout represent the native steelhead gene pool for restoring steelhead below the dam. The EIR should discuss the potential for future spills of landlocked trout over the dam and should evaluate how to either ensure these trout can survive in San Antonio Creek below the dam, or include a plan to rescue trout and move them back up into the reservoir.

The pipeline project proposes armoring San Antonio Creek below the dam with rip-rap to protect against scouring due to discharges from the cone valve(s). The EIR should quantify how much of the creek bed will be armored. If armoring of the creek is necessary, the project should include full mitigation in the form of creek restoration or habitat enhancement downstream.

The EIR for the project should discuss the potential for chemical spills from the proposed chemical storage and treatment facilities and what fail-safe containment and spill response program will be used. The SFPUC had a disastrous chlorine spill at the Sunol Valley Water Treatment Plant (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.

The San Antonio pipeline project includes installation of 2,000-gallon chemical storage tanks, chemical pump feeds and control valves. The environmental review for the project must discuss what fail-safe measures the SFPUC will implement at the San Antonio Pump Station 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.

Special status species, such as the state and federally listed California tiger salamander, may occur in the vicinity of proposed construction for this project. The EIR should discuss the potential for occurrence of special status species and potential impacts to species or their habitat. The project should emphasize avoidance of sensitive habitats and should fully mitigate for any direct or indirect impacts to native wildlife.

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: Tim Ramirez, SFPUC
Josh Milstein, S.F. City Attorney
Suzanne Gautier, SFPUC
U.S. Fish and Wildlife Service
California Department of Fish and Game