



# **Alameda Creek Alliance**

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October 19, 2004

Chief, Protected Resources Division  
NOAA Fisheries  
525 N. E. Oregon Street, Suite 500  
Portland, OR 97232

**Re: Comments on Central California Coast steelhead status review**

The Alameda Creek Alliance is a community watershed group with over 630 members working to restore native steelhead trout to the Alameda Creek watershed, in southern San Francisco Bay. The ACA supports retaining Endangered Species Act (ESA) protection for all listed salmon and steelhead trout populations throughout California, Oregon, and Washington, particularly in the Central California Coastal (CCC) region. We strongly support including resident trout in Alameda Creek and landlocked steelhead trout in Calaveras and San Antonio Reservoirs as part of the listed CCC Evolutionarily Significant Unit (ESU).

As detailed in our previous comment letter of January 13, 2004, the best scientific data (Nielsen and Fountain 1999, Gunther et al. 2000, Nielsen 2003) shows that resident rainbow trout populations in upper Alameda Creek and its tributaries and landlocked steelhead trout populations in Calaveras and San Antonio Reservoirs and their tributaries are genetically related to CCC wild steelhead trout. The best scientific information indicates that these populations should be managed as part of the CCC ESU of steelhead trout, listed as threatened under the ESA.

The Alameda Creek Fisheries Restoration Workgroup is a stakeholder group composed of over a dozen water management and regulatory agencies working on steelhead restoration in Alameda Creek, including the San Francisco Public Utilities Commission (SFPUC). The Workgroup has determined that these landlocked reservoir populations represent the best native gene pool for restoring an anadromous steelhead run below the dams (Gunther et al. 2000, CEMAR 2002).

The SFPUC contended in a February 13, 2004 letter to NOAA Fisheries that these reservoir populations are “protected” and that potential human impacts on habitat quality for these populations are “low.” However, the Calaveras Reservoir population is at severe risk of extirpation due to constrained dam operations and a proposed dam enlargement project, and the San Antonio Reservoir population is impacted by severe grazing and trampling of spawning habitat and predation by non-native fish.

The adfluvial steelhead trout population in Calaveras Reservoir spawns and rears in the lower mile

*- Protecting and restoring the natural ecosystems of the Alameda Creek watershed -*

of Arroyo Hondo Creek and the population in San Antonio Reservoir spawns and rears in Indian Creek and La Costa Creek (Entrix 2003, SFPUC 2003a). The California Department of Safety of Dams recently directed the SFPUC to operate Calaveras reservoir at 30-40% of capacity, due to seismic safety concerns. This reduced reservoir height will be in effect for at least several years and possibly up to a decade while approval and construction of a new reservoir takes place. The reduced water pool in the lowered reservoir has constrained reservoir habitat for trout, since the water column with suitable temperatures and oxygenation for trout survival has severely decreased (B. Sak, SFPUC, pers. comm., 2004). It has also caused potential fish passage problems for spawning migration due to braiding and subsurface flows in lower Arroyo Hondo Creek within the floodplain where the reservoir has receded (B. Sak, SFPUC, pers. comm., 2004). Available spawning habitat in Arroyo Hondo is already limited by a major landslide in lower Arroyo Hondo Creek that prevents adfluvial steelhead from spawning more than one mile upstream from Calaveras Reservoir (B. Sak, SFPUC, pers. comm., 2004). The S. F. Public Utilities Commission (SFPUC) has proposed a project to replace or enlarge Calaveras Dam up to four times its current capacity, which would potentially flood all available spawning habitat for the Calaveras Reservoir population. Intensive cattle grazing is permitted by the SFPUC above San Antonio Reservoir, and cattle have access to Indian Creek and La Costa Creek, where they have been observed trampling adfluvial steelhead trout redds, and are trampling and impacting stream and riparian spawning and rearing habitat in these creeks (pers. observations and Entrix 2003, SFPUC 2003a). Predation of adfluvial trout in San Antonio Reservoir by largemouth bass is also a potentially significant mortality factor(SFPUC 2003b).

The SFPUC has contended (letter of February 13, 2004) that protection of adfluvial and resident trout in the watershed may result in delisting of CCC ESU steelhead trout, because resident trout are numerous and populations are secure. As discussed above, reservoir populations are not at all secure. Furthermore, spawning adfluvial adults may currently only number in the low hundreds (B. Sak, SFPUC, pers. comm., 2004; see Entrix 2003, SFPUC 2003a). Populations of native resident rainbow trout below the dams, in Alameda Creek and its tributaries in the upper Sunol Valley, are also very small, with few to no trout found in most reaches in dry years (SFPUC 2000, 2001, 2002a, 2002b, 2004). These populations are severely constrained by lack of rearing habitat and high summer temperatures (see SFPUC 2000, 2001, 2002a, 2002b, 2004; Hanson 2002) due to lack of minimum flow releases from Calaveras Reservoir.

NOAA Fisheries and the California Department of Fish and Game have previously documented that protecting both resident and anadromous life-forms of steelhead trout is essential to the long-term survival of species (Busby et al. 1996, McEwan 2001, Bottom 2003, NMFS 2003), particularly in the CCC region and areas further south, where only remnant anadromous runs persist. The rebuilding of CCC steelhead trout populations is dependent on the resident populations as much as the ocean-migrating ones, as they provide buffers against drought years and maintain a continuous gene pool. NOAA Fisheries has acknowledged that management of resident and ocean-migrating populations should be treated with equal significance (Busby et al. 1996, NMFS 2003) and experts on the population structure of listed salmonids have advocated that adfluvial steelhead and resident rainbow trout in Alameda Creek should be protected as part of the threatened CCC ESU of steelhead trout (Nielsen and Fountain 1999, Nielsen 2003).

Critical recovery actions for Alameda Creek steelhead, such as securing minimum stream flows suitable for steelhead spawning and rearing, protection and restoration of instream and riparian habitat, and continued fish passage modification, depend upon increased protections for resident trout. Restoration projects on Alameda Creek are already well underway, but the listing of resident fish could provide the motivation for water agencies addressing stream flow issues such as obtaining water releases from the reservoirs to improve cold water summer rearing habitat and provide for out-migration of juvenile fish to the San Francisco Bay.

In summary, the best scientific evidence indicates and sound management practices require that resident trout in Alameda Creek, including adfluvial reservoir populations and resident rainbow trout below major dams, should be listed under the ESA as part of the CCC ESU of steelhead trout. These resident populations, themselves tenuous without increased protections, can contribute significantly to the eventual recovery of steelhead trout in Alameda Creek and the CCC ESU. Inclusion of these remnant resident populations would not appreciably change the status nor require the delisting of the CCC ESU.

Sincerely,

Jeff Miller, Director  
Alameda Creek Alliance

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