



Alameda Creek Alliance

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Chief, Protected Resources Division
National Marine Fisheries Service
1201 NE Lloyd Boulevard, Suite 1100
Portland, OR 97232

Sent via e-mail on 12/5/05 to SteelheadDPS.nwr@noaa.gov

Re: Proposed Central California Coast steelhead trout listing and DPS policy

These are the comments of the Alameda Creek Alliance regarding the National Marine Fisheries Service (NMFS) proposed alternative approach for delineating populations or Evolutionary Significant Units (ESUs) of west coast steelhead trout. NMFS has now proposed applying the joint NMFS/U.S. Fish and Wildlife Service *Policy Regarding the Recognition of Distinct Vertebrate Population Segments under the ESA* to delineate distinct population segments (DPSs) of west coast steelhead trout. Our comments focus on steelhead trout in Alameda Creek in the Central California Coast ESU.

We concur with and incorporate by reference the comments submitted today by Environmental Defense Center, Center for Biological Diversity, and California Trout, specifically that NMFS' proposed departure from the ESU policy is scientifically unjustified, arbitrary, and unlawfully sub-divides steelhead trout populations below the DPS level. We concur with the EDC/CBD/CalTrout comments that steelhead trout and rainbow trout in the Central California Coast ESU are not markedly different or separate, and cannot arbitrarily be divided into distinct populations under either the ESU or DPS policies.

We concur that NMFS should use a case-by-case evaluation of whether resident trout populations in Bay Area and Central California Coast watersheds should be included in the Central California Coast ESU of steelhead trout. The best available information indicates that all resident trout below major dams in the Central California Coast ESU (including rainbow trout in Alameda Creek) should be included in the listed steelhead population, as should those populations above dams that exhibit anadromous steelhead behavior and/or a continuing close genetic relationship to below-dam populations.

As detailed in our previous comment letters of January 13, 2003 and October 19, 2004, the best available scientific information (Nielsen and Fountain 1999, Gunther et al. 2000, Nielsen 2003)¹

¹ Nielsen, J. L. and M. C. Fountain. 1999. Microsatellite analyses of Alameda Creek rainbow/steelhead trout. U. S. Geological Survey/Biological Resources Division, Anchorage, Alaska. Unpublished report submitted to Applied Marine Sciences, Inc., October 7, 1999.

Gunther, A. J., J. Hagar, and P. Salop. 2000. An assessment of the potential for restoring a viable steelhead trout population in the Alameda Creek watershed. Prepared for the Alameda Creek Fisheries Restoration Workgroup, February 7, 2000. Available on the world wide web at <http://www.cemar.org/alamedacreek/pdf/assessment.pdf>

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 listed Central California Coast ESU steelhead trout. The best available scientific information shows that landlocked steelhead trout populations in Calaveras and San Antonio Reservoirs and their tributaries exhibit anadromous steelhead behavior, including downstream migrant juveniles documented in smolt condition (Entrix 2002, SFPUC 2003, 2004)². Ecologically and genetically, these resident trout are part of the same ESU or DPS as adult steelhead trout in the Central California Coast.

In its June 2004 listing proposal, NMFS concluded that landlocked steelhead trout populations above major dams in Alameda Creek should be included in the Central California Coast ESU, based on “recent genetic data,” presumably the Nielsen reports. NMFS has not offered or cited any differing or more compelling evidence that these landlocked populations are not genetically and ecologically part of the threatened Central California Coast ESU of steelhead trout. One public commenter, the San Francisco Public Utilities Commission (SFPUC), attempted to critique the Nielsen reports using anonymous reviewers and call into question the genetic legacy of these fish. These comments should be discounted, since the identity and expertise of the reviewers is unknown and their arguments are fallacious and contradicted by other SFPUC reports and conclusions (see Entrix 2002, SFPUC 2003, 2004).

The best available scientific information shows that resident rainbow trout and landlocked steelhead trout in the Alameda Creek watershed (particularly those populations in lower Alameda Creek, upper Alameda Creek, Stonybrook Creek, Pirate Creek, Welch Creek, Indian Joe Creek, W-Tree Creek, San Antonio Reservoir, San Antonio Creek, Indian Creek, La Costa Creek, Calaveras Reservoir, and Arroyo Hondo Creek) represent “significant genetic components of the native, wild *Oncorhynchus mykiss* resource” in Central California (Nielsen and Fountain 1999, Gunther et al. 2000, Nielsen 2003). NMFS must list these populations as part of the threatened Central California Coast ESU.

Sincerely,

Jeff Miller, Director
Alameda Creek Alliance

Nielsen, J. L. 2003. Population genetic structure of Alameda Creek rainbow/steelhead trout - 2002. U. S. Geological Survey/Biological Resources Division, Anchorage, Alaska. Draft report submitted to Hagar Environmental Science, January 3, 2003.

² San Francisco Public Utilities Commission. 2003. Fish trapping study data summary for San Antonio Creek, Indian Creek, and Arroyo Hondo 2002-2003. Prepared by San Francisco Public Utilities Commission Water Quality Bureau, Sunol, CA. November 2003.

San Francisco Public Utilities Commission. 2004. San Antonio Creek, Indian Creek and Arroyo Hondo Fish Trapping Data, Summary 2003. SFPUC Water Quality Bureau. Sunol, CA. 56 pp.

Entrix, Inc. 2002. Preliminary report on Alameda Creek watershed fish trapping, 2002. Unpublished report prepared for the San Francisco Public Utilities Commission, April 10, 2002. Entrix, Inc., Sacramento, California.