



Alameda Creek Alliance

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April 18, 2002

Paula Kehoe
S. F. Public Utilities Commission
1155 Market Street, 4th Floor
San Francisco, CA 94103

Re: SFPUC Capital Improvement Program - Calaveras Dam

Dear Paula Kehoe:

I am providing comments regarding the SFPUC's Capital Improvement Program (CIP), specifically the proposed Calaveras Dam Replacement project, on behalf of the Alameda Creek Alliance (ACA), a non-profit community watershed group working to protect and restore Alameda Creek. We have more than 1,100 members and supporters that live in the Alameda Creek watershed with an interest in protecting habitat for native species and restoring steelhead trout and salmon to Alameda Creek. Through the CIP, the SFPUC has proposed to spend \$150 million to replace Calaveras Dam. One option for the proposed project indicated in the CIP would replace the dam with a new dam 200 feet higher with a storage increase from 97,000 acre-feet (af) to 670,000 af, almost a seven-fold increase.

The ACA has been working cooperatively with the SFPUC through the Alameda Creek Fisheries Restoration Workgroup (Fisheries Workgroup) on a steelhead restoration project in Alameda Creek. The ACA has expressed conditional support for the replacement and modest enlargement of Calaveras Reservoir if mitigations beneficial to steelhead restoration are implemented. Our support would be contingent upon:

1) Removal of the Alameda Diversion Dam (ADD) from upper Alameda Creek. Removal of this dam would provide periodic passage flows for migratory fish at Little Yosemite, opening up over 12 miles of spawning and rearing habitat in upper Alameda Creek and Valpe Creek to steelhead, and would facilitate scouring flows and coarse sediment transport necessary to maintain salmonid habitat in upper Alameda Creek. The replacement Calaveras Dam would be enlarged to provide additional water storage at least equivalent to the annual amount of water diverted by the ADD.

2) Establishment of legally protected minimum flow releases from Calaveras Reservoir to benefit anadromous and other native fish populations in Alameda Creek downstream of the reservoir. These flows are required by California Fish and Game Codes, and may be required by the federal Endangered Species Act and if state water right permits are adjudicated. The amount and timing of flows would be determined in consultation with state and federal regulatory agencies and fisheries biologists working with the Fisheries Workgroup. These flows would not be recaptured. The

replacement Calaveras Dam would be enlarged to provide additional water storage at least equivalent to the flow releases.

3) Abandonment of the Alameda Creek Fishery Enhancement project, in agreement with the California Department of Fish and Game and California Trout, parties to the legal agreement requiring seasonal flow releases from Calaveras Reservoir. Construction of a rubber recapture dam has been proposed as part of the Fishery Enhancement project, to divert and recapture flows in upper Alameda Creek. Removal of the ADD and establishment of minimum flows from the enlarged Calaveras Dam would provide significantly more benefit than the Fishery Enhancement project for salmonids, other native fish, and aquatic resources in Alameda Creek, without the stream and riparian habitat degradation the proposed rubber dam would cause.

The Fishery Enhancement project was intended primarily to benefit resident trout and the proposed flow releases and recapture does not address the recent federal listing and restoration planning underway for steelhead trout and salmon in Alameda Creek. Abandoning this project would free up the \$6.7 million budgeted in the CIP for the “Fishery Enhancement” (building, operating, and maintaining the rubber dam and diversion) for removal of the ADD and establishment of minimum flow releases from Calaveras Dam. The SFPUC has not yet provided Calaveras Dam releases for the benefit of fish, although it has been almost 12 years since the California Trout complaint initiating the project was filed and 6 years since the flow release agreement was signed by the SFPUC. The ACA will absolutely oppose construction of any new dams in Alameda Creek.

4) Obtaining support to store additional water from outside of the Alameda Creek watershed drainage basin (i.e. Hetch Hetchy water) from conservation and fisheries restoration organizations in the affected river (i.e. Tuolumne River Preservation Trust, Friends of the Tuolumne, Clavey River Preservation Coalition, Friends of the River, American Rivers, Cal Trout, Sierra Club, Pacific Coast Federation of Fishermen’s Associations, Restore Hetch Hetchy, etc.). The ACA will not support a project that results in overall degradation of aquatic habitat or fisheries in other rivers.

5) Selecting a reasonable storage size for the enlarged Calaveras Reservoir. Increasing the size of Calaveras Dam would flood areas behind Calaveras Reservoir, including tributary streams which provide spawning and rearing habitat for landlocked native steelhead trout. Habitat for listed species such as the California red-legged frog, Alameda whipsnake, and other sensitive species would also be inundated. The ACA will oppose a dam of the magnitude proposed in the CIP if there are significant impacts to habitat for native species. The ACA would support enlargement of storage capacity equal to or greater than the annual ADD diversion, minimum flow releases, and “environmentally friendly” Hetch Hetchy water, provided there are not significant impacts to sensitive species behind the reservoir and that any impacts are adequately mitigated.

In summary, we believe the SFPUC should enlarge Calaveras Dam to provide additional water storage and reliability, remove the ADD, and establish minimum flow releases. However, the SFPUC should have reasonable expectations regarding this project’s contribution to projected storage requirements, as the potential environmental impacts increase with the size of the reservoir. Our understanding is that there are a variety of potential project options being considered. We do not see the need for a project of the magnitude proposed in the CIP budget and believe a smaller size reservoir is more appropriate. If the SFPUC can reach an agreement with conservation groups for capturing more Tuolumne River water during wet years in a manner which will not further degrade the Tuolumne River, the ACA will support a modest enlargement of Calaveras Dam to store this water.

We encourage the SFPUC to address these issues while developing the CIP and to budget money for projects and mitigations that will have the support of local conservation groups, rather than move forward with a project proposal which is guaranteed to meet determined opposition.

Sincerely,

Jeff Miller
Director, ACA

cc: Michael Carlin, SFPUC
Josh Milstein, S.F. City Attorney's Office
Alameda Creek Fisheries Restoration Workgroup
California Department of Fish and Game
California Trout
Tuolumne River Preservation Trust