



Alameda Creek Alliance

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San Francisco Planning Department
Attn: Sarah B. Jones
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Comments on Little Yosemite Fish Passage Project (Case No. 2014.0956E)

The Alameda Creek Alliance supports providing fish passage for anadromous steelhead trout through Little Yosemite when adult fish are once again present in upper Alameda Creek. Upper Alameda Creek above Little Yosemite may contain important spawning and rearing habitat for ocean-run steelhead, given the blocked access to historical habitat behind Calaveras and San Antonio reservoirs. However, there is debate about whether or not Little Yosemite would be passable to steelhead under higher flows without the modifications to the natural boulder falls proposed by the SFPUC in the Little Yosemite Fish Passage Project, and as yet the SFPUC has not presented evidence that the Little Yosemite falls would be impassable to steelhead without the modifications proposed in this project. The 2010 SFPUC study *Assessment of Fish Upstream Migration at Natural Barriers in the Upper Alameda Creek Sub-Watershed* only evaluated fish passage through Little Yosemite at low and moderate flows, and concluded that “it is unknown whether steelhead would be able to successfully immigrate through the entire Little Yosemite reach” during larger flow events.

We have concerns that the fish passage project, as proposed, may have unintended consequences and unnecessary significant impacts on imperiled native amphibians.

We disagree with the conclusion in the Preliminary Mitigated Negative Declaration that the proposed project “could not have a significant adverse effect on the environment.” The project as proposed could have significant impacts on habitat and populations of California red-legged frogs (a federally threatened species) and foothill-yellow legged frogs (a species which has been petitioned for federal Endangered Species Act protection) in upper Alameda Creek. We concur with the assessment of the potential significant impacts to native amphibians from the project in the 12/15/14 comment letter and appeal submitted by Save The Frogs!

The California Environmental Quality Act guidelines state that a Mitigated Negative Declaration is appropriate only when there is no substantial evidence that a project or any of its aspects could result in significant adverse impacts. Save The Frogs! has provided information and evidence that biological surveys for the project were inadequate, and missed known breeding populations of foothill yellow-legged frogs at the project site. Save The Frogs! also provided evidence that significant impacts to native amphibians can be expected from the project, including likely mortality of frogs during construction, loss of important breeding areas for foothill yellow-legged frogs, potential spread of chytrid fungus to uninfected native amphibian populations, and expansion of invasive bullfrogs and crayfish which predate on native frogs.

The Initial Study/Preliminary Mitigated Negative Declaration did not identify or adequately evaluate all of these potential significant impacts on imperiled native amphibians as a result of the project. The proposed mitigation measures are inadequate to reduce the effects of the

project to less than significant, and in fact, some of the proposed mitigation measures may themselves cause unintended negative impacts on native frogs.

It unclear why the Preliminary Mitigated Negative Declaration did not include extensive information developed by the SFPUC's consultant and frog expert Sarah Kupferberg of U.C. Berkeley about yellow-legged frogs and red-legged frogs in upper Alameda Creek.

We recommend that the Little Yosemite fish passage project be delayed until anadromous steelhead trout are present in the Little Yosemite reach. It makes no sense to cause impacts to native amphibians if it could later be determined that modifications to the natural features are not needed for effective fish passage. The SFPUC should monitor future trout migration to determine if the three identified natural features are in fact migration barriers or cause significant delay in trout migration.

If a boulder modification project is pursued at Little Yosemite, preparation of an Environmental Impact Report would be required under CEQA, to fully identify and evaluate impacts to native amphibians and to provide suitable avoidance and mitigation measures.

Under no circumstances should construction be scheduled during frog breeding season. Potential mitigation measures should include a comprehensive and ongoing bullfrog and crayfish eradication program by the SFPUC.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Miller', is positioned above the typed name and title.

Jeff Miller
Director

cc: Tim Ramirez, SFPUC
Yin Lan Zhang, San Francisco Planning Department
Steve Smith, San Francisco Planning Department
Joshua Fuller, National Marine Fisheries Service
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