



Alameda Creek Alliance

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August 2, 2017

San Francisco Board of Supervisors
1 Dr. Carlton, B. Goodlett Place, Room 244
San Francisco, CA 94102

Re: Planning Commission Decision Regarding Alameda Creek Recapture Project

Dear San Francisco Supervisors:

The Alameda Creek Alliance has concerns about the San Francisco Public Utilities Commission's (SFPUC) Alameda Creek Recapture Project and impacts that its operations could have on recovering threatened steelhead trout within the Alameda Creek watershed. We share the concerns about the inadequacies of the recently certified Environmental Impact Report (EIR) that have been raised by the National Marine Fisheries Service (NMFS), California Department of Fish and Wildlife (CDFW), and Alameda County Water District (ACWD). We support the ACWD petition to reverse the certification of the EIR for the project.

The Alameda Creek Alliance has more than 2,000 members and supporters. Since 1997 we have advocated for restoration of steelhead trout in the Alameda Creek watershed. We have worked with the SFPUC since 1999 to improve habitat conditions to support the recovery of steelhead. While we generally support the recapture project and the concept of off-stream rather than in-stream water recapture, state and federal fisheries agencies have determined that the final EIR does not contain sufficient information to support the conclusion that the project will not result in a less than significant impact on streamflows and fish migration in Alameda Creek.

The Alameda Creek Alliance submitted scoping comments on the Alameda Creek Recapture Project in 2015 and commented on the draft EIR for the project in January 2017. We have reviewed the SF Planning Commission's June 22, 2017 decision to certify the final EIR and the June 7, 2017 responses to comments on the EIR. We have also reviewed the ACWD's July 24, 2017 letter of appeal and concerns about the hydrology analysis used for the EIR; the July 24, 2017 comment letter from CDFW; and the July 27, 2017 comment letter from NMFS.

NMFS commented that the final EIR does not contain sufficient information to conclude that the project will not result in substantial effects on streamflows intended to support migration of steelhead trout, and in fact found that project operations will diminish migration opportunities for steelhead, especially outmigrating smolts, in some years. CDFW commented that the modeling analysis used for the EIR may be inadequate for the determination that the project will have "less than a significant impact" on fisheries resources of Alameda Creek.

An ACWD analysis of daily modeling data provided by the SFPUC after the close of the EIR comment period shows that project operations could result in increased numbers of days where streamflows in lower Alameda Creek fall below the threshold for fish passage, as determined by NMFS. ACWD commented that the hydrologic model relied on in the EIR's impact analyses is insufficient to analyze the surface water groundwater interaction necessary to fully evaluate project impacts. CDFW shared this concern that the modeling used in the EIR did not adequately address ground and surface water interaction in the stream reach of the proposed project, and that the EIR analyses do not adequately quantify the stream reach percolation

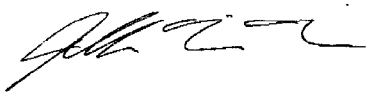
losses of SFPUC releases.

We are also concerned about the potential reduction in the number of days that steelhead could have access to spawning and rearing habitat upstream of the project. Data presented in the EIR shows that the current proposal for project operations will reduce the number of days where adequate streamflow is available for steelhead migration. The EIR uses monthly average changes in surface water flow to conclude that steelhead will not be harmed, whereas analysis of daily flows is needed to assess the effects of suitable streamflows for steelhead. We disagree with the EIR's conclusion that operation of the project will not significantly impact steelhead trout. There is simply not adequate information in the EIR to make a determination about streamflows and impacts to steelhead.

We request that the Board of Supervisors direct the SFPUC and the SF Planning Commission to work with all watershed stakeholders (including the ACA, ACWD, CDFW and NMFS) to undertake additional analysis of the relationship between ground water and surface water in the Sunol Valley, to determine whether the project has impacts on daily streamflows in Alameda Creek downstream of the project which could impede steelhead migration. If the SFPUC is unwilling to do this, the Board of Supervisors should uphold the ACWD appeal and reject the certification of the EIR for the project.

San Francisco has invested significant time and money in the Alameda Creek watershed to monitor and improve habitat conditions for steelhead trout. The future operations of the completed Calaveras Dam and Alameda Creek Diversion Dam will enhance steelhead spawning and rearing in stream reaches managed by the SFPUC. Both the SFPUC and ACWD are required to operate their facilities in Alameda Creek to meet specified flow requirements for steelhead. The Alameda Creek Recapture Project should support rather than undermine these efforts. We understand that this is the last Water System Improvement Project facility to be constructed, but it is important to get it right – the EIR must fully evaluate the potential impacts of the project, and San Francisco should only approve a recapture project that will meet the interests of all watershed stakeholders and adequately protect steelhead trout.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Miller", written in a cursive style.

Jeff Miller
Director
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