

**Chapter 12. Alternatives to the Proposed Incidental Take**

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## **12. Alternatives to the Proposed Incidental Take**

The HCP represents the City's approach for minimizing and mitigating the impacts of operating the water supply system on the covered species. Section 10 of the ESA requires an applicant for an incidental take permit to identify "what alternative actions to such taking the applicant considered and the reasons why such alternatives are not being utilized." This chapter describes those alternatives. The environmental impacts of the alternatives and the HCP actions are described in the accompanying environmental impact statement (EIS).

### **12.1 No Action/No HCP**

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In this alternative, the City would continue to release water from the reservoirs into the Bull Run River to improve water temperature conditions and comply with Clean Water Act requirements. Flow to achieve the necessary temperatures would average 35 cfs (varying from 20 cfs to 40 cfs, depending on daily weather) in the summer and would be a minimum of 70 cfs in October in normal years and 30 cfs in critical years. Temperatures at Larson's Bridge would be kept below 21 °C to prevent salmonid mortality until modifications were completed on the intake towers at Dam 2. When the intake tower modifications are complete (as well as modifications to the Dam 2 stilling pool and rock weir), temperatures would be managed to comply with the requirements specified in the Temperature Management Plan (see Appendix G) and described in Chapter 7. A rock weir below Dam 2 would also be modified to allow for quicker routing of cool water. No other actions would be taken. This alternative was not selected because it would offer less benefit to the covered species than the HCP measures with none of the regulatory assurances.

### **12.2 Passage above Bull Run Dams/No Offsite Measures**

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In this alternative, the City would install facilities to collect returning adult fish near the rock weir below Dam 2, truck them upstream past the dams, and release them into the two reservoirs. Facilities would also be installed to collect juvenile fish above the dams, truck them downstream, and release them below the rock weir below Dam 2. All other Bull Run River and Bull Run reservoir measures in the HCP would also be implemented. None of the offsite measures in the HCP would be implemented. This alternative was not selected because it also would provide less overall benefit to covered species than the HCP measures but at a greater cost to the City and its water customers than the HCP.