



**PUBLIC UTILITIES COMMISSION  
CITY AND COUNTY OF SAN FRANCISCO**

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**ANSON B. MORAN**  
General Manager

**SAN FRANCISCO  
MUNICIPAL RAILWAY**

**HETCH HETCHY  
WATER AND POWER**

**SAN FRANCISCO  
WATER DEPARTMENT**

March 11, 1994

Mr. Dale Pierce, Acting Field Supervisor  
Fish and Wildlife Service  
Sacramento Field Office  
2800 Cottage Way, Room E-1803  
Sacramento, CA 95825-1846

Dear Mr. Pierce:

These comments to the Fish and Wildlife Service's (FWS) proposed listing of the Sacramento splittail as a threatened species under the Endangered Species Act, are submitted on behalf of the Public Utilities Commission for the City and County of San Francisco.

The San Francisco Public Utilities Commission governs the operations of Hetch Hetchy Water and Power and the San Francisco Water Department, which together provide water to 2.3 million Bay Area residents. The San Francisco service area includes some or all of the counties of Alameda, Santa Clara, San Mateo and San Francisco. This area is home to many commercial and industrial customers, including the high technology industry of the Silicon Valley.

San Francisco is concerned with the biological status of the Sacramento splittail, proposed for listing as a threatened species under the Endangered Species Act (ESA). Federal Register Volume 59, No. 4, January 6, 1994 at page 862. It is our understanding that some controversy exists over abundance of splittail in the Bay/Delta, especially in relation to the relative abundance of juveniles and adults, and the significance of those relationships in the ESA listing process.

As a water user on the Tuolumne River, tributary to the Bay/Delta, San Francisco has an interest in the listing process. Accordingly, San Francisco would like to be a participant in that process, and so submits these comments encouraging Fish and Wildlife Service to consider all relevant data in pursuing the listing process under the Endangered Species Act.

Thank you for the opportunity to submit these comments to the proposed listing of the Sacramento splittail.

Sincerely,

A handwritten signature in black ink, appearing to read "Anson Moran".

Anson Moran, General Manager  
Public Utilities Commission