



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Marine Region
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



September 11, 2020

Brenda Goeden
San Francisco Bay Conservation and Development Commission
Bay Area Metro Center
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San Francisco, CA 94105
Brenda.Goeden@bcdcd.ca.gov

Subject: California Department of Fish and Wildlife Recommendations for Revisions to the San Francisco Bay Long Term Management Strategy Environmental Work Windows

Dear Ms. Goeden:

The California Department of Fish and Wildlife (Department) would like to thank the San Francisco Bay Conservation and Development Commission (BCDC) for reaching out to request additional information on the Department's recommended revisions to the San Francisco Bay Long Term Management Strategy (LTMS) environmental work windows. It is our understanding that BCDC is in the process of finalizing changes to the environmental work windows and incorporating them into an online viewer available to agencies, the dredging community, and the public. Per your request for further clarification on revisions recommended by the Department to the LTMS environmental work windows dated May 20, 2020, the Department has the following recommendations for specific changes to the Pacific herring and Dungeness crab work window.

Pacific Herring

The original LTMS environmental work window described for Pacific herring is March 1 through November 30 in areas of Richardson Bay, North Bay, and South Bay. The Department recommends that the work window be revised to March 16 through November 30 and be adhered to from Pinole Point in the north to Redwood Creek in the south incorporating both the western and eastern shorelines of San Francisco Bay. It is recommended that this window be for all dredging gear types.

Justification

The Department has reviewed our herring biomass estimates and tracking of yearly individual spawns over the last 10 years. During that time period, approximately 14 spawns large enough to document have occurred after March 1 with a range of approximately 0 to 5 percent of the total biomass in those years. Department staff also noted that numerous "spot spawns" which are very small and short in duration occur during this time of the year. These types of spawns which can add up to affect the overall biomass estimate are not always captured in our yearly individual spawn counts. The Department concluded that an additional two weeks in March is necessary to protect the spawns occurring at the end of the herring spawning season.

Sensitive Locations

The Department has also identified two separate sensitive spawning locations specific to herring:

- Richardson Bay
 - The area from Yellow Bluff to Peninsula Point and all areas extending north from a line connecting these two landmarks.
- San Francisco Waterfront
 - The shoreline from Oracle Park extending south to southern most point of Islais Creek.

The Department has identified these two locations has having proportionately higher totals of the yearly spawning biomass estimates over the course of 40 years monitoring the herring fishery in San Francisco Bay. Protecting spawning fish in these locations is essential given the high percentage of biomass attributed to spawns at these locations. Additionally, the overall spawning biomass in San Francisco Bay continues to decline over time with the 2019/2020 spawning season likely being one of the lowest biomass estimates on record. The Department recommends that the revised work window at these two locations not be considered for time extension requests moving forward and be incorporated into the work window description or specified in project approvals to prevent potential impacts to the important spawning events at these two locations.

Dungeness crab

The original LTMS environmental work window described for Dungeness crab is July 1 through April 30 of the following year in shallow berthing areas north of San Francisco Bay including San Pablo Bay. The Department recommends that the environmental work window be revised to include all areas within 45 meters (approximately 150 feet) of eelgrass or eelgrass habitat. It is recommended that this work window be for all dredging gear types.

Justification

The original work window was very vague as to what defined shallow berthing areas and the exact locations in which it should be adhered to. This obviously created confusion among the dredging community but also with the agencies issuing approvals. Department staff concluded a work window that would protect sensitive refuge and foraging habitat for juvenile Dungeness crab in San Francisco Bay was needed. Although Dungeness crab do inhabit a wide array of areas inside San Francisco Bay during the months of May and June, the Department felt that protecting the most sensitive habitat during this time frame was the best option for the species without creating a more restrictive window over a much wider area potentially reducing the time to dredge each year by up to 30 days.

Conclusion

If BCDC has any questions or would like clarification on the Department recommended LTMS work window revisions and additions, please contact Arn Aarreberg, Arn.Aarreberg@wildlife.ca.gov, (707) 791-4195.

Brenda Goeden
San Francisco Bay Conservation and Development Commission
September 11, 2020
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Sincerely

A handwritten signature in blue ink, appearing to read "Craig Shuman".

Craig Shuman, D. Env
Marine Regional Manager

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