



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
501 West Ocean Boulevard, Suite 4200
Long Beach, California 90802- 4213

JAN 29 2008

In response refer to:
SWR/F/SWR3:LH

Clyde Morris
U.S. Fish and Wildlife Service
Don Edwards San Francisco Bay National Wildlife Refuge
9500 Thornton Avenue
Newark, California 94560

Dear Mr. Morris:

In response to the release of the Final Environmental Impact Statement (FEIS) for the South Bay Salt Pond Restoration Project (SBSRP), the Southwest Regional Office and the Restoration Center of the National Marine Fisheries Service (NMFS) would like to express our general support for the project. Historically the South San Francisco Bay (South Bay) contained large areas of tidal marsh, tidal mud flats, tidal channels, and Olympia oyster beds, but these habitats have been largely lost due to coastal development, fill, and the creation of salt ponds. The SBSRP proposes to reconnect former salt ponds to the San Francisco Bay (SF Bay) via water control structures (managed ponds) and full tidal inundation (tidal habitat). A progression over time from a 50:50 ratio of tidal habitat to managed ponds, to a 90:10 ratio is anticipated. The SBSRP has the potential to improve and expand habitat for many of our agency's trust species.

There are 22 species of fish known to occur in the South Bay that are federally managed by Fishery Management Plans (FMP) under the Magnuson-Stevens Fishery Conservation and Management Act (MSA):

Pacific Groundfish FMP – 18 species of rockfishes, flatfishes, sharks, *etc.*
Coastal Pelagics FMP - northern anchovy, Pacific sardine, jack mackerel
Pacific Coast Salmon FMP - Chinook salmon

The SF Bay is identified as Essential Fish Habitat (EFH) for various life stages of fish species managed by these three FMPs. In addition, the SF Bay is designated as Habitat Areas of Particular Concern (HAPC) for various fish species within the Pacific Groundfish FMP.

There are two species (Distinct Population Segments [DPS]) of fish known to occur in the South Bay that are listed under the federal Endangered Species Act:



Central California Coast steelhead DPS (*Oncorhynchus mykiss*)
threatened (January 5, 2006, 71 FR 834)

North American green sturgeon southern DPS (*Acipenser medirostris*)
threatened (April 7, 2006, 71 FR 17757)

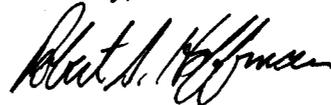
The SBSPRP has the potential to benefit these ESA and MSA managed species and their associated estuarine habitat, especially if the 90:10 ratio of tidal habitat to managed ponds is achieved.

Although we generally support the SBSPRP, our agency does have some outstanding concerns about the impact of the project on ESA species and EFH. One issue is the potential for entrapment of fish or their prey in managed ponds with water control structures, and the water quality of these ponds. Another concern is the lack of a scientific monitoring plan for fish species to measure the expected success of the project, and lack of a responsible party to carry out such a plan for the life of the project. Other issues currently exist related to flood control uses of pond A8. Discussions between our agency and representatives of the SBSPRP are currently underway to resolve these issues.

Overall, we believe that this program will assist the mission of NMFS by improving and expanding estuarine habitat in the South Bay. We are happy to support this project and look forward to the success of the SBSPRP.

For questions regarding these comments please contact Laura Hoberecht at (707) 575-6056, or via email at laura.hoberecht@noaa.gov.

Sincerely,



Robert S. Hoffman
Assistant Regional Administrator
for Habitat Conservation Division

cc: Russ Strach, NMFS, Sacramento, CA
Patrick Rutten, NMFS, Santa Rosa, CA
Cristi Reid, 1315 East-West Highway, SSMC III, Room 15727, Silver Spring, MD