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San Diego Port Master Plan Update (PMPU), Draft Program Environmental Impact Report (Draft PEIR), SCH# 2017031070

Dear Mr. Campbell:

The California Department of Fish and Wildlife (Department) received a Notice of Availability of a Draft Program Environmental Impact Report (Draft PEIR) for the San Diego Unified Port District's (District) Port Master Plan Update (PMPU) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the PMPU that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide biological impact and mitigation comments regarding those aspects of the PMPU that the Department by law may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

DEPARTMENT ROLE

The Department is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the state. (Fish & G. Code, Section711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines Section 15386, subd. (a).) The Department, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, Section 1802.) Similarly for purposes of CEQA, the Department is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

adversely affect fish and wildlife resources. The Department is also responsible for marine biodiversity protection under the Marine Life Protection Act in coastal marine waters of California, and ensuring fisheries are sustainably managed under the Marine Life Management Act. Pursuant to our jurisdiction, the Department has the following comments and recommendations regarding the PMPU.

PROGRAM DESCRIPTION SUMMARY

Proponent: San Diego Unified Port District (District)

Objective: The Draft PEIR for the PMPU are programmatic documents for the proposed planning districts and policies. There are no currently proposed development or maintenance projects, but there are plans for development in each planning district. The programmatic documents are for District guidance in planning for future development and maintenance projects. The finalized PEIR and PMPU documents will enable a streamlined CEQA project review process. The District's future project planning will be based on proposed planning districts, elements, and policies. The proposed PMPU objectives are related to District managed land, submerged land and tideland uses, planning, development, and maintenance. The main objectives of the proposed PMPU are as follows:

- Create an integrated Port Master Plan (PMP) for the District that governs the use, design, and improvement of public trust lands in accordance with Section 30711 of the California Coastal Act (CCA), the Public Trust Doctrine, and the San Diego Unified Port District Act (Port Act).
- Within the District's PMPU area, create standards for new development which serve to enhance and blend development with the surrounding character and other land and tidelands uses.
- Streamline the project review and entitlement process for implementation of the PMP.
- Allow for an intensity and diversity of development that provides on-going and sustainable District revenues as required by the Port Act and Public Trust Doctrine.
- Provide an interconnected mobility network that encourages a range of travel modes.
- Create and maintain recreation open space opportunities including physical and visual access to the water.
- Provide opportunities for creating waterfront attractions for visitors while protecting and restoring the environment through the proactive management of sensitive biological resources and ensuring coastal access around San Diego Bay.

Location: San Diego Unified Port District encompassing San Diego Bay (Bay) submerged lands, tidelands uplands, and harbors (City of San Diego, San Diego County, California).

Timeframe: To be determined for each future project.

Marine Biological Significance
The Bay, which is 12 miles long and 1 to 3 miles wide, is the third largest natural bay in California. The existing Bay waters, seagrass beds, shorelines, wetlands, estuary, and salt ponds provide diverse habitats for thousands of resident and migratory marine fish, invertebrates, sea turtles, marine mammals, and bird species. The Bay waters and shorelines provides important fish nursery and bird nesting habitats. Bay open water is locally important for foraging habitat of many protected and listed endangered or threatened multiple bird species and the East Pacific (DPS) green sea turtles (*Chelonia mydas*). Extensive seagrass beds in the Bay provide spawning and nursery grounds for state and federally managed fish and invertebrates such as California halibut (*Paralichthys californicus*), spotted sand bass (*Paralabrax maculatofasciatus)* and barred sand bass (*Paralabrax nebulifer)*, northern anchovies (*Engraulis mordax*) and the California spiny lobster (*Panulirus interruptus*). Sensitive habitats, fish, and wildlife are vulnerable to coastal development and project construction and operational impacts.

COMMENTS AND RECOMMENDATIONS

The Department offers the following comments and recommendations for the Draft PEIR to assist the District in adequately identifying and/or mitigating potentially significant, direct, and indirect fish and wildlife impacts from future planned projects as described in the PMPU.

I. Future Project Level Impacts and Other Considerations

Comment #1 Dredging, Pile Driving and Removal Impacts and Sound Criteria
Under the proposed PMPU there will be future planned dock, pier, wharf, and marina installation projects. These projects will include pile driving installations and/or pile removals which may generate significant underwater sound pressure levels causing temporary or permanent impacts to fish and other marine life. Impacts may include a startled response in fish resulting in fish temporarily leaving the safety of their normal essential habitats to avoid construction noise. In some situations, pile driving or pulling sound pressure waves can cause fish barotrauma injury or mortality if not mitigated to tolerable noise levels. The Department relies on guidance from the Fisheries Hydroacoustic Working Group for setting sound pressure level safety criteria for fish resources, and for pile driving projects. The agreed upon criteria consists of sound pressure levels (SPL) of 206 decibels (dB) peak and 187 dB (or 183 dB for fish less than 2 grams body weight) accumulated sound exposure level (SEL) for all listed fish within a project area. Impacts to marine organisms from underwater sound are influenced by the SELs, SPLs, sound frequency, and depth and distance from the sound output source. Additional information on in water sound level criteria can be found at: https://dot.ca.gov/programs/environmental-analysis/biology/hydroacoustics

Dredging, pile driving or pulling may generate temporary increased water turbidity impacts. Turbidity plumes may temporarily reduce or block essential underwater light for primary producers that use photosynthesis for growth and survival. This can cause

temporary reduced marine life productivity during turbid conditions due to the reduced light levels. Turbidity can also cause temporary reduced ability of fish to forage and avoid predators.

Removal of creosote timber piles may result in broken piles and pile stub at or above the mud line. A timber pile stub that is left at the mudline may potentially remain in eelgrass habitat, prevent eelgrass expansion within the footprint of each cut pile, and potentially continue to leach creosote contaminants into the environment.

Recommendation: The Department recommends that future projects include an analysis of anticipated in water SPLs and SELs. If anticipated sound levels of future projects exceed the Interim Criteria for Injury to Fish [peak SEL of 206 decibels (dB) and accumulated SEL of 187 dB SEL threshold for fish over 2 grams, and 183 dB for fish under 2 grams], (Interim Criteria 2008), then sound level monitoring should be done during pile driving and/or pile removal activities. If monitoring indicates sound level exceedances of Interim Criteria have occurred, work should cease immediately and additional mitigation measures should be implemented to reduce SPL and SEL levels below criteria thresholds.

Mitigation Measures: To avoid or minimize in water sound impacts to fish from pile driving, the Department recommends the Final PEIR, MM-BIO-3, include, at a minimum, the following mitigation measures:

- In water sound level monitoring should be conducted if the analysis of anticipated SPLs and SELs exceed acceptable levels described in the Interim Criteria for Injury to Fish.
- To reduce in water sound levels during pile driving all piles should be driven with a vibratory hammer to the maximum extent feasible. If an impact hammer is required, additional sound attenuation, such as a wood cushion block and/or air bubble curtain, should be utilized.
- The Department recommends avoiding the use of treated wood piles. Fish and Game Code §5650 states that it is unlawful to deposit into, permit to pass into, or place where it can pass into waters of the state any substance or material deleterious to fish, plant life, or bird life (FGC §5650(6)). The Department considers any wood treated with ACZA, CCA, ACQ to be deleterious materials. The PMPU should consider the use of piles made of alternative materials such as plastic, concrete, or steel to the maximum extent feasible. If use of plastic, concrete, or steel piles is not feasible, all wood piles should be wrapped with a benign material to prevent waters of the Bay from direct contact with the treated wood. Additionally, all wrapped wood piles that may be subject to contact with docks, floating debris and/or boats, should be inspected on a yearly basis to confirm the integrity of the wrap and to repair any damaged areas.

Mitigation Measure: The Department recommends timber pile extractions use the vibratory extraction methods to the maximum extent feasible. Recommended secondary options may include direct pull and cutting at least two feet below the mudline. Care should be taken to avoid rocking the piles during removal to minimize turbidity and

potential redistribution of contaminated sediments. If the timber pile should break off at or above the mudline or cannot be removed, the pile should be cut, at a minimum, 2 feet below the mud line.

Comment #2 Native Eelgrass and Shallow Water Habitat Impacts
Eelgrass (*Zostera marina*) and (*Zostera pacifica*) habitat which is mostly found in shallow water habitats in the Bay has been identified as a special aquatic site and given protections by the Clean Water Act. The Magnuson–Stevens Fishery Conservation and Management Act (MSA) identifies it as a Habitat Area of Special Concern. Eelgrass habitat within shallow waters is an important habitat for many species of marine fish, invertebrates, sea turtles, marine mammals, and is frequently used for fish-foraging areas by state fully protected seabirds such as the California least tern and various other sensitive or special status birds. Additionally, shallow Bay water habitat is essential for photosynthesis required for phytoplankton, algae, and eelgrass plant growth. Therefore, shading of eelgrass and overwater structure covering shallow Bay water may cause adverse impacts to eelgrass habitat, reduced high quality habitat areas for fish, birds, and various sensitive wildlife as well as reduced primary production in Bay waters. The potentially significant impacts discussed above should be avoided, minimized, and mitigated if necessary. If mitigation is required, the Department and other resource and permitting agencies should be included. Eelgrass mitigation measures and compensation should be guided by the California Eelgrass Mitigation Policy (CEMP), (NOAA 2014).

Permanent operational impacts may occur from dredging and pile installations resulting in hydrological changes and fill of Bay waters. Dredging, pile driving, or pile removals may cause adverse direct losses and damage to eelgrass habitat or unvegetated eelgrass habitat. These activities may also generate potentially adverse, indirect and/or temporary sedimentation or burial of eelgrass habitat. Sedimentation may cause eelgrass habitat degradation and/or direct losses due to a buildup of sediment (silt) on top of eelgrass plants. Dredging may also permanently convert shallow depth eelgrass habitat to deeper depths which may not be suitable for optimal eelgrass growth.

Recommendation: For future Bay water fill and dredging projects that permanently impact shallow Bay water and eelgrass habitats, the Department recommends compensatory mitigation be implemented prior to in water project construction to avoid temporal impacts.

Recommendation: For unavoidable permanent losses of eelgrass and shallow Bay water habitat due to Bay shading, overwater structure, fill or dredging, the Department recommends development of a master eelgrass and shallow Bay water habitat Mitigation, Monitoring and Reporting Plan (MMRP). The MMRP could use generic language revised as necessary for future proposed projects within the PMPU planning districts. The master MMRP should include a generic list of best available science-based compensatory mitigation measures for permanent habitat impacts. The master MMRP should be developed in collaboration with the Department and other agencies and included in the Final PEIR.

Recommendation: If future projects propose transplanting of eelgrass for eelgrass compensatory mitigation, restoration, or mitigation banks, a Scientific Collecting Permit (SCP) from the Department will be required prior to harvest and transplanting activities. The SCP may include conditions such as donor bed surveys, limits on number and density of turions collected, methods for collection and transplanting, notification of activities, and reporting requirements. Please visit the Department's SCP webpage for more information: https://wildlife.ca.gov/Licensing/Scientific-Collecting.

Mitigation Measure: To avoid and minimize potentially significant eelgrass and unvegetated eelgrass habitat impacts within or adjacent to a project area, include protective pile and dredging construction methodologies to reduce water turbidity and sedimentation. The Department recommends the Final PEIR include the following turbidity and sedimentation mitigation measure for dredging, pile driving and/or pile pulling:

- To contain turbidity and sedimentation to the smallest area during construction, install silt curtain barriers around dredging footprints and piles or use coffer dam methodologies as applicable.

Comment #3 Invasive Species Impacts
Disturbance of the bottom sediments from dredging and pile construction may redistribute non-native species that compete with native species. This could cause widespread adverse impacts to the marine ecosystem. The invasive algae *Caulerpa taxifolia* is listed as a federal noxious weed under the U.S. Plant Protection Act and while deemed eradicated in 2006 is monitored for potential future emergence. Another invasive algae species found recently in Newport Bay is *Caulerpa prolifera*, which is also a potential threat to the native marine ecosystem.

The Department recommends including a mitigation measure detailing a pre-construction *Caulerpa spp*. survey to identify potential existence of invasive *Caulerpa spp.* as described in the Caulerpa Control Protocol https://www.fisheries.noaa.gov/west-coast/habitat-conservation/aquatic-invasive-species-west-coast. If *Caulerpa spp.* are found, do not disturb the species and contact the Department and National Marine Fisheries Service within 24 hours as described in the Caulerpa Control Protocol.

Comment #4 California Least Tern, DEIR Section 4.3
The California least tern (*Sterna antillarum browni*) is a species listed as endangered under the Federal Endangered Species Act (ESA), California Endangered Species Act (CESA), and designated a California Fully Protected (FP) species under the Fish and Game Code. FP species may not be taken or possessed at any time and must be completely avoided by all future project impacts. Although Mitigation Measure BIO-1 (MM-BIO-1), Mitigation Measure BIO-2 (MM-BIO-2), Mitigation Measure BIO-4 (MM-BIO-4), and Mitigation Measure BIO-7 (MM-BIO-7) in the Draft PEIR address some potential concerns pertaining to California least tern, they do not adequately avoid impacts to the species.

Sand dunes and beaches around the Bay provide suitable nesting habitat for California

least tern, and there are annual breeding colonies documented in multiple locations around the Bay. Least tern forage within the Bay and in the adjacent open ocean. As indicated in the Draft PEIR, foraging behavior could be impacted by construction-induced noise from in-water activities such as pile driving, as well as increased turbidity from in-water activities. Noise disturbance may lead to nest abandonment and hatch failure, or direct mortality of chicks. Installation of overwater structures would also result in a permanent reduction of foraging habitat for least tern.

As written, MM-BIO-1, MM BIO-2, MM-BIO-4, and MM-BIO-7 are not sufficient to ensure that least terns, if present, would be avoided by the Project.

MM-BIO-1 indicates that when the District determines that future projects may impact foraging habitat for California least tern, a qualified biological monitor will be retained during nesting season (April 1 to September 15). If the monitor determines that noise-producing activities are impacting foraging behavior of least tern, the project proponent shall take specific actions which may include halting or reducing intensity of pile driving, placing sound dampening panels on pile driving equipment, or restricting pile driving to periods when sensitive avian species are not present.

MM-BIO-2 requires construction noise measures to reduce noise impacts on sensitive marine-dependent avian species. For projects that the District determines will have the potential to disturb nesting marine-dependent avian species, required mitigation measures include: a nesting bird survey by the on-site biologist within 500' of the noise-generating activity within 1 week prior to the start of construction, buffer areas of 500' for raptors and 300' for non-raptors, establishment of a baseline ambient sound level, and daily noise monitoring; if levels exceed 10 dBA above baseline and species behavior is modified, construction may be halted or noise reduction measures will be implemented.

MM-BIO-4 implements Best Management Practices (BMPs) to reduce turbidity during in-water construction that may disturb sediment. BMPs include contractor education for vessel operations, and deployment of a turbidity curtain around pile driving.

MM-BIO-7 requires site-specific environmental review for future development projects that may result in the loss of open water habitat or shading. Actions may include consultation with appropriate resource agencies, acquisition of necessary permits, and inclusion of one or more mitigation measures. Specific mitigation measures may include: removal of an amount of existing overwater coverage within the Bay that has a 1:1 equivalent of the project coverage, restoration or creation of wetland or eelgrass habitat within the Bay at a 1:1 ratio for wetlands or 1.2:1 ratio for eelgrass habitat, purchase of saltmarsh wetland or overwater coverage credits at a mitigation bank, purchase of credits from the District's shading credit program, inclusion of a shading analysis, and retaining a qualified biologist to conduct eelgrass surveys.

Appendix G of CEQA guidelines states that impacts to listed species would be considered significant. California least terns are both ESA- and CESA-listed, as well as

FP per Section 3511 of the Fish and Game Code. Although the PMPU proposes measures to reduce potential impacts to least terns, it does not ensure that the take would be avoided.

Recommended Potentially Feasible Mitigation Measure(s)
To reduce impacts to less than significant: To avoid take, incidental or otherwise, of California least tern, the District shall implement a tern-specific mitigation measure that will avoid or minimize in water construction impacts. In addition to the measures already discussed in the Draft PEIR, the following language shall be incorporated:

a. to completely avoid impacts to California least tern, pile driving shall be conducted outside of least tern nesting season (April 1 to September 15). If the least tern nesting season cannot be avoided, then a California least tern monitoring and avoidance plan shall be prepared by the District for review and approval by the Department and the US Fish and Wildlife Service (collectively the Wildlife Agencies), prior to the beginning of construction activities;

b. when construction activities will occur within 500 feet of suitable California least tern nesting habitat, a qualified biologist shall conduct surveys prior to activity initiation. Surveys shall consist of three visits separated by two weeks, starting April 1 prior to ground disturbance, pile driving, or construction activities. The results of the surveys shall be reported to the District, and the Wildlife Agencies shall be notified if nesting least terns are documented on-site or within 500' of Project impacts. No work shall begin until the Wildlife Agencies are notified, and a 500' buffer is established;

c. a qualified biological monitor shall remain on-site during all construction activities that occur within, or adjacent to, suitable nesting habitat for least tern during nesting season. The monitoring schedule may be modified with Wildlife Agencies' approval; and,

d. if nesting California least terns are detected, the District shall establish a 500-foot no operations buffer around any active nests. The buffer shall remain in place until the nest has fledged or is no longer active.

Comment # 5 California Brown Pelican, Draft PEIR, Section 4.3
California brown pelican (*Pelecanus occidentalis californicus*) are a FP species. As indicated in the prior comment, FP species may not be taken or possessed at any time and must be completely avoided by all future project impacts. The Mitigation Measures in the Draft PEIR do not adequately avoid impacts to this species.

California brown pelican are frequently observed foraging in the Bay. As noted in the Draft PEIR, there is high foraging potential anywhere that schooling fish species can be found. California brown pelican commonly rest along riprap or structures found along the Bay shore. Potential direct and indirect impacts to brown pelican foraging may result from noise disturbance and increased turbidity resulting from in-water activities, such as pile driving. Direct loss of foraging habitat may occur from installation of over water structures.

As written, the Mitigation Measures are not sufficient to ensure that impacts to California brown pelican, if present, would be avoided by future projects. As outlined in the prior comment, MM-BIO-1 requires that a biological monitor remain on site during nesting season, and that the project proponent shall take specified actions if sensitive species are identified. MM BIO-2 requires construction noise measures to reduce impacts to sensitive marine-dependent avian species. MM-BIO-4 implements BMPs to reduce turbidity from in-water construction. MM BIO-7 requires site-specific environmental review for future development projects that may result in loss of open water habitat or create shading.

Appendix G of CEQA guidelines states that impacts to listed species would be considered significant. California brown pelican are state FP per Section 3511 of the Fish and Game Code. Although the PMPU proposes measures to reduce potential impacts to California brown pelican, it does not ensure that take would be avoided.

Recommended Potentially Feasible Mitigation Measure(s)
To reduce impacts to less than significant: To avoid take, incidental or otherwise, of California brown pelican, the District shall implement a brown pelican-specific mitigation measure that will avoid or minimize impacts to foraging habitat. In addition to the measures already discussed in the DEIR, the following shall be incorporated:

a. a California brown pelican monitoring and avoidance plan shall be prepared by the project proponent, for review and approval by the Wildlife Agencies, prior to the beginning of construction activities; and,

b. when conducting work within suitable foraging habitat, a biological monitor shall be on-site during construction to ensure that any CESA-listed species are not agitated, killed, or injured.

ll. General Comments

Ecological Opportunity Areas
The Department reviewed the EOA section of the Draft PEIR (Appendix J, Page 104). ECO Policy 1.1.15. The policy states; "*The District shall identify various ecological opportunity areas within water use designations that have shallow subtidal or intertidal habitat that may benefit from additional restoration or enhancement, or additional nature-based shoreline stabilization.*" The Department recommends that ECO Policy 1.1.15 be revised or additional new policies created and included in the Final PEIR:

- The Department understands new EOA identifications will be ongoing and recommends the new EOAs identified in the future be incorporated into Figure 3.3.2, map of EOAs. The revised EOA maps should be made available to the Department.
- The Department recommends sea level rise and climate change vulnerability be analyzed for each new EOA identified. The analysis should include how the habitat may change over time due to sea level rise and climate change. If the

Bay EOA is specifically identified and chosen to enhance protection of Bay habitat or infrastructure from climate change, this should be specifically identified on district planning maps and on Figure 3.3.2.

Mitigation Banks

The Department reviewed Appendix J proposed ECO Policy 1.2.1 (mitigation credit program). The Department recommends that the District consult with the Department and other applicable agencies when the District chooses to develop the mitigation credit program, as stated in the proposed policy. The District should also consult with the Department on specific mitigation bank proposals for eelgrass and other Bay habitats. The Department should be consulted on decisions related to whether natural Bay habitat areas including eelgrass could be used for a mitigation bank. Additionally, the Department recommends going through the CDFW mitigation bank process. More information on the CDFW mitigation banking process can be found at: https://wildlife.ca.gov/Conservation/Planning/Banking/Guidelines.

Aquaculture

The Draft PEIR identifies aquaculture as a future activity but does not specify designs or specific purposes for future shellfish aquaculture facilities and equipment. When marine aquaculture operations are proposed in the future, the District should consult with the Department and provide complete and detailed information about the purpose, design, locations, and aquaculture species. The Department recommends including the following steps, at a minimum, for planning future aquaculture facilities:

- The Final PEIR should detail the mechanism by which the District plans to move forward with aquaculture on granted tidelands.
- Collaborate early and often with the Department and other agencies on appropriate designs and locations to avoid and minimize negative impacts to marine fish, native shellfish, wildlife, and natural habitats such as eelgrass and estuary habitat.
- Include aquaculture avoidance and minimization strategies for protecting marine resources and water quality impacts.
- A Department issued aquaculture registration will be required annually for any future aquaculture operations. More information on the Department's aquaculture permitting process can be found at: https://permits.aquaculturematters.ca.gov/Permit-Guide.

Artificial Reef and Hard Structure

The Draft PMPU identifies living shorelines and eco-friendly building materials meant to attract marine species. The Department has authority over artificial reef or hard structure installations meant to attract marine life for habitat purposes, including Statutory/Legislative Authority, Trustee and Responsible Agency Status under CEQA and the Marine Life Management Act, and an advisory role to other agencies. The Department has additional authority pursuant to Fish and Game Code Section 6420-6425 which established the California Artificial Reef Program (CARP) in 1985. The program was created to investigate the potential to enhance declining species through

the placement of artificial reefs and is currently unfunded with no identified source of funding. The CARP does not consider reef or hard structure placement for habitat mitigations, seawalls, or revetments, dampening effects of sea level rise, improved diving opportunities, and habitat restorations. Until the Department develops a scientifically based statewide artificial reef plan, it is unable to support any proposed new artificial reef or artificial habitat regardless of intent.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). Information on submitting data to the CNDDB can be found at: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by Department. Payment of the fee is required for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

Conclusion

The Department appreciates the opportunity to comment on the Draft PEIR. If you have any questions or comments, please contact Region 7 Loni Adams, Environmental Scientist, at 858-204-1051 or Loni.Adams@wildlife.ca.gov. Region 5 Jessie Lane, Environmental Scientist, at 858-636-3159 or Jessie.Lane@wildlife.ca.gov.

Sincerely,

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