

San Francisco Bay Conservation and Development Commission

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Governor's Office of Planning & Research

JUN 21 2022

STATE CLEARINGHOUSE

Jacqueline Zipkin
General Manager
East Bay Dischargers Authority
2651 Grant Avenue
San Lorenzo, CA 94580
Via email: < jzipkin@ebda.org >

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report for the *Cargill Mixed Sea Salt Processing and Brine Discharge Project*, in San Lorenzo, an unincorporated community in Alameda County, City of Hayward, Union City, Fremont and Newark, Alameda County (BCDC Inquiry File No. MC.MC.7415.026; SCH # 2022050436)

Dear Ms. Zipkin:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the *Cargill Mixed Sea Salt Processing and Brine Discharge Project* (project), received in our office on May 19, 2022. The proposed project is located along approximately 16 miles of San Francisco Bay shoreline in portions of the cities of San Lorenzo, an unincorporated community in Alameda County, City of Hayward, Union City, Fremont, and Newark in Alameda County. The project includes installation of additional infrastructure at the Cargill Solar Salt Facility and a new pipeline to transport the concentrated Mixed Sea Salts (MSS) brine currently stored in Ponds 12 and 13 to the East Bay Discharger Authority (EBDA) Oro Loma Sanitary District/Castro Valley Sanitary District Water Pollution Control Plant where it will be diluted, mixed with the effluent, and discharged to the Bay consistent with EBDA NPDES permit requirements. The Cargill Ponds 12 and 13 currently store approximately 6 million tons of MSS adjacent to the Bay and these ponds are facing a potential long-term threat of sea level rise from the Bay. The discharge of the MSS from these ponds via the pipeline is anticipated to take approximately 10-20 years based upon the estimated discharge rate. The project is intended to remove the MSS and reduce the potential for impacts from sea level rise.

The San Francisco Bay Conservation and Development Commission (Commission) is a responsible agency for this project and will rely on the DEIR when it considers the project. Our staff has prepared comments outlining specific Commission issues or policies that should be addressed either in the DEIR or through the Commission permitting process as appropriate, based on the



project details in the NOP. As we receive additional details on the project, we will be able to provide more detailed responses and can work closely with the project proponents to ensure the project is consistent with Commission laws and policies.

The comments below are based on the McAteer-Petris Act and the Commission's San Francisco Bay Plan (Bay Plan). Commission staff has initially identified and summarized several policies and policy areas that are likely to apply to the project, however we also encourage you to review the McAteer-Petris Act and Bay Plan directly to ensure the project design complies with all relevant sections of these documents.

Commission Jurisdiction

Portions of the project would likely be located within the Commission's jurisdiction. In the proposed project area, there are four distinct jurisdiction types, defined in detail in the McAteer-Petris Act (Section 66610) and summarized as follows:

- a. San Francisco Bay, being all areas that are subject to tidal action, including all sloughs, and specifically, the marshlands lying between mean high tide and five feet above mean sea level; tidelands (land lying between mean high tide and mean low tide); and submerged lands (land lying below mean low tide);
- b. A shoreline band consisting of all territory located between the shoreline of San Francisco Bay (as defined above) and a line 100 feet landward of and parallel with that line, but excluding any portions of salt ponds as described below;
- c. Salt ponds, consisting of all areas which have been diked off from the bay and have been used during the three years from [approximately 1966 to November 11, 1969] for the solar evaporation of bay water in the course of salt production; and
- d. Certain waterways, consisting of all areas subject to tidal action, including submerged lands, tidelands, and marshlands up to five feet above mean sea level, on, or tributary to Plummer Creek to the eastern limit of the salt ponds.

The Commission's jurisdiction also includes all areas formerly subject to tidal action that have been filled since September 17, 1965. Within its jurisdiction, Commission permits are required for activities that involve placing fill, extracting materials, or making any substantial change in use of any water, land, or structure. Permits are issued if the Commission finds the activities to be consistent with the McAteer-Petris Act and the policies of the Bay Plan.

The DEIR should provide a detailed and complete project description, clarify where the project would occur within the Commission's Bay, 100-foot shoreline band, salt ponds, and certain waterways jurisdictions, and identify the Commission's permitting role.

Priority Use Areas

Section 66602 of the McAteer-Petris Act states, in part, that certain water-oriented land uses along the bay shoreline are essential to the public welfare of the Bay Area; these priority use areas are designated on the Bay Plan Maps. The project and alternative alignments appear to be covered by two Bay Plan Maps. As shown on Map 6 and 7, there are multiple areas of the project site or near the project site that are classified as a “Wildlife Refuge” Priority Use Area, including Eden Landing Ecological, the Cargill Salt Ponds, a portion of Oro Loma Marsh and perhaps other areas as indicated on the Map. Additionally, the Bay Plan Maps 6 and 7 indicate that there are also a few different areas in or near the project site that are classified as “Waterfront Park, Beach” Priority Use Area, including a few areas of the Hayward Regional Shoreline and the Coyote Hills Regional Park,

Pursuant to the Commission’s authority under the McAteer-Petris Act and the Bay Plan, these areas mentioned above must be reserved for wildlife refuge and waterfront park purposes, and any activities therein must be consistent with Bay Plan policies describing appropriate uses and other considerations for wildlife protection, wildlife refuges, and recreation, including policies related to Public Access; Recreation; and Fish, Other Aquatic Organisms, and Wildlife, as described further below, unless the activity or project is interim, easily displaceable, and/or will not interfere with the priority use. The DEIR should discuss those areas of the project site that are designated for wildlife refuge and waterfront park priority uses, the consistency of any proposed uses with this designation and, if there are inconsistencies, how the project proponents plan to resolve them. There are also other planning documents relevant to this project area, including the Hayward Marsh Master Plan. The DEIR should also provide additional information about how the project aligns with other local and regional plans.

Commission Law and Bay Plan Policies Relevant to the Project

Fill within the Bay and Salt Ponds

Section 66605 of the McAteer-Petris Act sets forth the criteria necessary to authorize placing fill in the Bay and certain waterways. It states, among other things, that further filling of the Bay should only be authorized if it is the minimum necessary to achieve the purpose of the fill and if harmful effects associated with its placement are minimized. The McAteer-Petris Act requires that fill be limited to water-oriented uses or minor fill for improving shoreline appearance or public access, and should be authorized only when no alternative upland location is available for such purpose. Such projects must be designed to: (a) minimize near-term adverse impacts to and loss of existing Bay habitat and native species; (b) provide substantial net benefits for Bay habitats and native species; and (c) be designed in accordance with sounds safety standards and protect persons and property against unstable geologic soils or flood and storm waters.

Additionally, Section 66602.1 says that any development within the salt ponds should provide the maximum public access to the Bay consistent with the project and should retain maximum amount of water surface area consistent with the proposed project.

The DEIR should indicate the amount of fill that would be placed and extracted in the Commission's jurisdictions for the project overall and for each specific project area. Depending on the amount of net total fill proposed and the uses proposed for the fill, the Commission may require fill removal or habitat mitigation elsewhere, in accordance with Bay Plan policies related to mitigation (described further below).

Public Access and Recreation

Section 66602 of the McAteer-Petris Act states, in part, "that maximum feasible public access, consistent with a proposed project, should be provided." In addition, the Bay Plan includes a number of relevant policies related to Public Access and Recreation. The Public Access policies provide that maximum feasible public access to and along the waterfront, and on permitted fills, should be provided in and through every new development in the Bay or on the shoreline, whether it be for housing, industry, port, airport, public facility, wildlife area, or other use for wildlife and restoration areas, unless there would be public safety considerations or significant use conflicts.

To allow the Commission to evaluate consistency of the project with the laws and policies, the DEIR should analyze the impacts to public access and/or how to mitigate for any public access impacts; providing this information will help the Commission determine whether the project is providing the maximum feasible public access consistent with the proposed project. If any public access areas are proposed as part of the project, the DEIR should describe in detail the existing and proposed (i.e., new or enhanced) public access areas, amenities, and recreation areas within the project site, and how these project components have been designed to conform with our laws and policies.

Please note that there are a few Commission-required public access areas that the proposed pipeline alternatives may run through, as well as some existing sections of the Bay Trail that appear to occur along some of the routes for the pipeline alternatives. The project should be designed to minimize adverse impacts to these areas during construction, and should include use of well-managed, phased public access detours or closures where necessary. Commission staff will be happy to help you identify these areas and existing permit requirements, and review proposed detour or closure plans. Please contact our staff if there are any questions about where the Commission-required public access areas are located. Depending upon the scope of the project and potential impacts, the Commission may require minimization measures or mitigation for impacts to public access areas.

If public access improvements are included with the project, there may be additional public access policies relevant for the project. Such policies focus on minimizing impacts from public access on wildlife; avoiding significant adverse impacts from sea level rise and flooding; ensuring the access is accessible, inclusive, and appropriate for the local community culture and environment; consulting the [Public Access Design Guidelines](#) in design of the public access area; and other important considerations. Furthermore, the policies provide that the Design Review Board, composed of design and planning professionals, should advise the Commission on the

design and adequacy of proposed public access. There are also Recreation policies related specifically to waterfront parks and wildlife refuges, including that interpretive information should be provided about wildlife, habitat, and related elements; that where feasible and appropriate, opportunities for environmental education, community service, volunteer, and related programs should be provided; and that historic buildings in waterfront parks and wildlife refuges should be preserved and made accessible to the public where appropriate.

Appearance Design, and Scenic Views

The Bay Plan includes policies related to Appearance, Design, and Scenic Views that may be applicable to the project. These policies provide, among other requirements, that maximum effort should be made to provide, enhance, or preserve views of the Bay and shoreline, especially from public areas; that planning waterfront development should include participation by professionals knowledgeable of the Commission's concerns, such as landscape architects, urban designers, or architects; and that vista points should be provided and made accessible to the public.

The DEIR should describe how the project would maximize views to the Bay and take maximum advantage of the shoreline setting. Proposed structures, including any shoreline protection, pipeline facilities, and fencing, should be designed to avoid or minimize visual barriers to the Bay. If there are areas where unavoidable and significant adverse impacts to existing Bay views would occur, the project should include proposed alternative enhancements to public access and/or views to the Bay to mitigate for this loss.

Salt Ponds

Based on the project description in the NOP, we understand that the project is likely to include some construction through existing salt ponds and restored tidal marsh areas, depending upon the alignment chosen. Additionally, the goal of the project is to remove the MSS from the existing salt ponds (Ponds 12 and 13) near the Bay. The Bay Plan includes policies on both Salt Ponds that are relevant for this activity, including policies related to the use of the salt ponds and potential for future restoration.

The DEIR should describe the intended use for Ponds 12 and 13 following the project and after the MSS have been discharged from these areas. Please explain whether the ponds will continue to be used in production of salt and how they will fit in the overall operations for salt making at the facility. Depending upon the future use of these ponds, additional policies within the Bay Plan may apply.

Fish, Other Aquatic Organisms and Wildlife

The policies in this Bay Plan section address the benefits of fish, other aquatic organisms and wildlife, and the importance of protecting the Bay's subtidal and tidal marsh habitats, native, threatened, or endangered species, and species that are candidates for listing as endangered or threatened. Policy No. 1 requires that the Bay's tidal marshes, tidal flats and subtidal habitat be

conserved, restored, and increased “to the greatest extent feasible.” The DEIR should address how the construction and use of the proposed project would meet these policies and avoid or minimize impacts to special-status species and habitats in the Bay. The DEIR should also quantify any impacts to the species and their habitat areas and discuss any proposed mitigation to offset unavoidable impacts. The project proponents should continue coordinating with appropriate wildlife resource agencies, including the California Department of Fish and Wildlife, the National Marine Fisheries Service, and the U.S. Fish and Wildlife Service. Additionally, the DEIR should evaluate whether any of the alternatives considered, or new alternatives, would allow for the removal of the MSS from the Bay fronting ponds more quickly to eliminate the potential for environmental impacts (i.e., leakage or spilling of the MSS into the Bay) to water quality, species, and habitats sooner than other alternatives.

Tidal Marshes and Tidal Flats

The policies in this Bay Plan section provide limitations on projects that would substantially harm tidal marshes or tidal flats and give guidance on the restoration of these habitats. Among these policies, Policy No. 1 requires that projects occurring within tidal marshes and tidal flats should only be allowed if they provide substantial public benefits and there is no feasible alternative. Policy No. 2 and 3 requires that projects avoid or minimize impacts to tidal marshes and tidal flats and transition zones between tidal and upland habitats. Additionally, this section contains specific policies related to tidal marsh restoration projects, which may be applicable if any restoration is being considered following the removal of the MSS from Ponds 12 and 13. If restoration is being considered following the removal of the MSS, please read through this Bay Plan policy section for the specific requirements for restoration projects. Additionally, Policy No. 10 states that based on scientific ecological analysis, project need, and consultation with the relevant federal and state resource agencies, fill may be authorized for habitat enhancement, restoration, or sea level rise adaptation of habitat.

The DEIR should discuss in detail any filling or other construction activities that would occur in tidal marshes or tidal flats; the anticipated effects on these habitats, how the impacts will be avoided, minimized, and mitigated for; and analysis of the potential impacts and benefits of project alternatives that may involve more or less fill in wetland areas. Any fill for habitat proposed as part of the project should be designed with a balance that will minimize near-term adverse impacts to, and maximize long-term net benefits for, Bay habitats and native species.

Water Quality

The policies in this Bay Plan section address water quality and require Bay water pollution to be prevented to the greatest extent feasible. New projects are required to be sited, designed, constructed, and maintained to prevent or minimize the discharge of pollutants in the Bay by controlling pollutant sources at the project site, using appropriate construction materials, and applying best management practices. Bay Plan Policy No. 2 requires that water quality in all parts of the Bay be maintained at a level that will support and promote the beneficial uses of the Bay as identified by the San Francisco Bay Regional Water Quality Control Board.

We understand that the MSS ponds contain highly concentrated salts with an estimated salinity between 350 to 600 parts per thousand. Leakage or emptying of the brines to the Bay or sensitive habitats, either from the ponds or the conveyance facility, could result in significant water quality impacts and toxicity. The DEIR should discuss the potential for releases of brine during construction and over the life of the project and what measures will be taken to prevent such releases, including shoreline protection as discussed below. The DEIR should further identify whether any portions of the project site are polluted with other toxic or hazardous substances. This discussion should include any anticipated effects associated with such contaminants including with future sea level rise anticipated through the life of the project, how these risks would be addressed, and the role other agencies will take in the review. The DEIR should also address how the construction and use of the proposed project would be designed to control stormwater runoff and pollution to the Bay and is complying with the requirements of the Water Board, such as through the NPDES permit for the EBDA outfall.

Finally, if any shoreline protection is being considered, Policy No. 7 requires that, whenever practicable, native vegetation buffer areas should be used in place of hard shoreline and bank erosion control methods where appropriate and practicable. The DEIR should identify the approach the project will take in terms of shoreline protection at the site and discuss where the use of nature-based shoreline protection would be appropriate and feasible.

Mitigation

The Bay Plan has policies related to mitigation that may apply to the project, depending upon the impact areas and the extent of the project that is within the Commission's jurisdiction. Policy No. 1 says that projects should be designed to avoid adverse impacts to Bay resources. Whenever adverse impacts cannot be avoided, they should be minimized to the greatest extent practicable. Finally, measures to compensate for unavoidable adverse impacts should be required. Mitigation is not a substitute for meeting the other requirements of the McAteer-Petris Act.

The remaining policies provide additional requirements for projects that require compensatory mitigation, among them that "...mitigation projects should be sited and designed within a Baywide ecological context, as close to the impact site as practicable," that "communities surrounding both the project and the compensatory mitigation site should be meaningfully involved in an equitable and culturally-relevant manner," that "resource restoration should be selected over creation where practicable" and that "transition zones and buffers should be included in mitigation projects where feasible and appropriate."

Mitigation Policy No. 8 requires, in part, that any proposed mitigation projects include clear project goals; clear and measurable performance standards; a monitoring and reporting plan designed to identify potential problems early and determine appropriate remedial actions; a contingency plan to ensure the success of the mitigation project; and provisions for the long-term maintenance, management and protection of the mitigation site. The DEIR should describe and analyze in detail any alternatives for the compensatory mitigation that are being considered for any project impacts that may occur, taking into account the policies summarized above.

Safety of Fills and Climate Change

The NOP mentions that there is a long-term threat of sea level rise from the Bay in the project area and to the Solar Salt Facility. Additionally, Bay Plan Map No. 7 contains a note on subsidence for this area of the Bay that says “[a]rea subject to possible subsidence. Construction in or near Bay should be carefully planned, taking into account effects of future subsidence and sea level rise.” We understand that AECOM also prepared a memo in 2021 that discusses the sea level rise and flooding vulnerability of different ponds within Cargill facilities. However, this memo does not appear to address the issue of subsidence or the seismic stability of the current berms protecting the ponds. The Bay Plan has several policies relevant for the project related to climate change, sea level rise, and safety of fills. Climate Change Policy No. 2 requires, in part, that “a risk assessment should be prepared by a qualified engineer,...based on the estimated 100-year flood elevation that takes into account the best estimates of future sea level rise and current flood protection and planned flood protection....A range of sea level rise projections for mid-century and end of century based on the best scientific data available should be used...[the] assessment should identify all types of potential flooding, degrees of uncertainty, consequences of defense failure, and risks to existing habitat from proposed flood protection devices.” Policy No. 3 states that where such risk assessments show vulnerability to public safety, projects should be designed to be resilient to a mid-century sea level rise projection, and an adaptive management plan should be developed to address sea level rise impacts beyond mid-century through the life of the project.

In addition, Policy No. 4 in the Bay Plan Safety of Fills section states that structures on fill or near the shoreline should have adequate flood protection, including consideration of future relative sea level rise as determined by engineers. The policy states that, “adequate measure should be provided to prevent damage from sea level rise and storm activity that may occur on fill or near the shoreline over the expected life of a project...New projects on fill or near the shoreline should either be set back from the edge of the shore so that the project will not be subject to dynamic wave energy, ...be specifically designed to tolerate periodic flooding, or employ other effective means of addressing the impacts of future sea level rise and storm activity.”

It appears that the AECOM memo was commissioned to help assess the sea level rise vulnerability of the existing Solar Salt Facilities. The DEIR should include a summary of the results of this memo and include additional sea level rise vulnerability analysis for the new infrastructure proposed as part of the project. This analysis should include the expected life of the project, a preliminary assessment of the project’s vulnerability to future flooding from extreme storms and sea level rise using mid- and end-of-century sea level projections, and include anticipated site-specific storm surge effects. In addition, the DEIR should also include an assessment of the potential for subsidence in the project area and how this may impact potential flooding of the infrastructure. The DEIR should also describe how the project has been designed for adapting to, tolerating, and managing sea level rise and shoreline flooding at the site over the life of the project to ensure the project is resilient to mid-century sea level rise projections, and how the

infrastructure may be adaptable after that, if necessary. For example, the DEIR should indicate whether the infrastructure for the new pipeline could be raised in the future if needed, taking into account spatial constraints, whether the underlying soils would support additional fill, and other limitations. We also recommend that the DEIR discuss the seismic stability of the berms around Ponds 12 and 13 and how they will remain intact over the life of the project to ensure there will not be spilling of the MSS into the Bay following a strong earthquake. In addition, the DEIR should include a discussion of groundwater at the site, how it is expected to impact the MSS ponds and the pipeline infrastructure both during construction and with future sea level rise, and how any risks from groundwater rise would be addressed.

The project may need to go before the Commission's Engineering Criteria Review Board (ECRB), which reviews projects "for the adequacy of their specific safety provisions, and make[s] recommendations concerning these provisions [and] prescribe[s] an inspection system to assure placement and maintenance of fill according to approved designs." Our staff will work with the project proponent to determine whether ECRB review and early guidance is necessary.

Shoreline Protection

The NOP mentions that the liquid bittern in Ponds 12 and 13 is stored adjacent to the Bay at the Solar Salt Facility and that there are currently 6 million tons of the MSS stored in these ponds. As mentioned above, the NOP mentions that the proposed project is being considered in light of the potential long-term threat of sea level rise from the Bay. The Bay Plan policies on Shoreline Protection establish criteria by which new shoreline protection projects may be authorized and by which existing shoreline protection may be maintained or reconstructed. Policy No. 1 describes important technical requirements for shoreline protection projects, including issues related to flooding, erosion, and sea level rise. Policy No. 5 requires that "all shoreline protection projects should evaluate the use of natural and nature-based features such as marsh vegetation, levees with transitional ecotone habitat, mudflats, beaches, and oyster reefs, and should incorporate these features to the greatest extent practicable...Ecosystem benefits, including habitat and water quality improvement, should be considered in determining the amount of fill necessary for the project purpose." Shoreline protection projects should also avoid adverse impacts to natural resources and public access, and mitigation or alternative public access must be provided when avoidance is not possible.

The DEIR should further detail the risk from rising sea levels, subsidence, and potential seismic safety of the existing, unengineered berms surrounding Ponds 12 and 13 and include details of any project elements, such as shoreline protection, that may be included around these ponds to ensure that there is no release of the MSS to the Bay over the life of this project. We recommend that Cargill consider design options for the Ponds 12 and 13 berms that can increase the stability of the berms against a strong earthquake that may occur over the life of the project. The DEIR should also describe in detail all existing and proposed shoreline protection features at the site, including an analysis of their potential to adversely impact natural resources and public access,

and how the impacts would be avoided, minimized, or mitigated for. In any areas where shoreline protection may be needed as part of the project, the DEIR should describe and analyze the feasibility of using natural or nature-based alternatives as described in the policies above.

Environmental Justice and Social Equity

The proposed project would take place adjacent to communities classified as having moderate to high levels of vulnerability based on social and environmental factors, according to [BCDC's Community Vulnerability Mapping Tool](#) and the [CalEnviroScreen tool](#). As such, relevant Bay Plan policies on Environmental Justice and Social Equity will likely apply to the project. These policies require, in part, that equitable, culturally-relevant community outreach and engagement be conducted by project applicants to meaningfully involve potentially impacted communities for major projects and appropriate minor projects in underrepresented and/or identified vulnerable and/or disadvantaged communities. The policies also state that potential disproportionate impacts on vulnerable communities should be identified and addressed in collaboration with the potentially impacted communities. In addition, Shoreline Protection Policy No. 2, Public Access Policy No. 5, and Mitigation Policy No. 3 require appropriate and meaningful community outreach for these portions of the project.

The project proponents should conduct meaningful community engagement throughout the project planning, design, and permitting, and should describe these efforts in detail in the DEIR and associated permit application materials. In the Commission permit application process, we will require a detailed description of all community engagement that occurred during design, including the following information:

- the number and types of outreach activities, including a description of how the activities were designed to be accessible and relevant for local communities;
- the estimated number of groups and individuals reached, including a description of how those groups and individuals represent relevant local community interests;
- a description of any potential disproportionate impacts on local communities identified during project design, and how these impacts have been or will be addressed; and
- any concerns raised during outreach activities, including a description of whether and how those concerns have been (or will be) addressed, and a description and rationale for any community concerns you do not currently plan to address.

You may also wish to consult our Frequently Asked Questions webpage on these policies [here](#). In addition, please see mapping resources of community vulnerability and community-based organizations [here](#).

Public Trust

The public trust doctrine holds that navigable waters and tidal lands are the property of the state and must be protected for public use and enjoyment. The Bay Plan policies on public trust lands states, in part, that when taking actions on such land, the Commission "should assure that the action is consistent with the public trust needs for the area and, in the case of lands subject to

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legislative grants, would also assure that the terms of the grant are satisfied and the project is in furtherance of statewide purposes." Public trust uses cited in the Bay Plan include commerce, navigation, fisheries, wildlife habitat, recreation, and open space. The DEIR should indicate where the State's public trust requirements might apply to the proposed project and discuss how the project would be consistent with the public trust.

Thank you for providing the staff with an opportunity to review the NOP for the DEIR for the *Cargill Mixed Sea Salt Processing and Brine Discharge Project*. We recognize the importance and scope of this project to protect the Bay and habitats from the MSS brine and hope these comments aid you in preparation of the DEIR. We look forward to working with you and the project sponsors as the project is developed and through the permitting stage. If you have any questions regarding this letter or the Commission's policies and permitting process, please do not hesitate to contact me at 415-352-3624 or anniken.lydon@bcdc.ca.gov.

Sincerely,



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