



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

Bay Delta Region

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GAVIN NEWSOM, Governor

CHARLTON H. BONHAM, Director



June 14, 2023

Brandon Phipps

City of Sausalito

420 Litho Street

Sausalito, CA 94965

BPhipps@sausalito.gov

Subject: City of Sausalito 6th Cycle Housing Element Programs, Notice of Preparation of a Draft Environmental Impact Report, SCH No. 2023050516, City of Sausalito, Marin County

Dear Mr. Phipps:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) from the City of Sausalito (City) for City of Sausalito 6th Cycle Housing Element Programs Project (Project).

CDFW is providing the City, as the Lead Agency, with specific detail about the scope and content of the environmental information related to CDFW's area of statutory responsibility that must be included in the EIR (Cal. Code Regs., tit. 14, § 15082, subd. (b)).

CDFW ROLE

CDFW is a **Trustee Agency** with responsibility under the California Environmental Quality Act (CEQA) for commenting on projects that could impact fish, plant, and wildlife resources (Pub. Resources Code, § 21000 et seq.; Cal. Code Regs., tit. 14, § 15386). CDFW, 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. (Fish & G. Code, § 1802). CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as a permit pursuant to the California Endangered Species Act (CESA) or Native Plant Protection Act (NPPA), the Lake and Streambed Alteration (LSA) Program, and other provisions of the Fish and Game Code that afford protection to the State's fish and wildlife trust resources. For purposes of CEQA, CDFW 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 adversely affect fish and wildlife resources. Pursuant to our authority, CDFW has the following concerns, comments, and recommendations regarding the Project.

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REGULATORY REQUIREMENTS

California Endangered Species Act and Native Plant Protection Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in “take” of plants or animals listed under CESA or NPPA, either during construction or over the life of the Project. Under CESA, “take” means “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” (Fish & G. Code, § 86). If the Project will impact CESA listed species, such as those identified in **Attachment 1**, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA ITP. CDFW’s issuance of an ITP is subject to CEQA and to facilitate Permit issuance, any such project modifications and mitigation measures must be incorporated into the EIR’s analysis, discussion, and mitigation monitoring and reporting program.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, & 15065). In addition, pursuant to CEQA, the Lead Agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the Lead Agency makes and supports Findings of Overriding Consideration (FOC) for impacts that remain significant despite the implementation of all feasible mitigation. FOC under CEQA; however, do not eliminate the Project proponent’s obligation to comply with the Fish and Game Code.

Lake and Streambed Alteration

An LSA Notification, pursuant to Fish and Game Code sections 1600 et. seq., is required for Project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that will substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland habitat; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. CDFW may not execute the final LSA Agreement until it has considered the final EIR and complied with its responsibilities as a Responsible Agency under CEQA.

Fully Protected Species

Fully Protected species, including any listed in **Attachment 1**, may not be taken or possessed at any time except for collecting these species for necessary scientific research, relocation of the bird species for the protection of livestock, or if they are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

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Marine Life Protection Act

CDFW is responsible for marine biodiversity protection in coastal marine waters of California and ensuring fisheries are sustainably managed pursuant to Fish and Game Code section 2850 et seq.

PROJECT DESCRIPTION AND LOCATION

The Project entails adoption of zoning changes, zoning overlays, and other actions needed to implement Program 4 of the Sausalito Housing Element, a portion of the City's General Plan that was updated in 2021. The Housing Element identifies how the City would accommodate the development of 908 total housing units based on needs identified in the City's 6th Cycle Regional Housing Needs Allocation. Of the 908 units, 647 units would be in opportunity sites subject to rezoning as identified in the Housing Element.

The Project consists of discontinuous parcels subject to these actions within the borders of the 2.1-square mile City of Sausalito, located in southern Marin County on the shores of Richardson Bay. The City is bound by San Francisco Bay (Richardson Bay) to the east, Golden Gate National Recreation Area to the west and south, and unincorporated Marin County, including the community of Marin City to the north and northwest.

The CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.) require that the EIR incorporate a full project description, including reasonably foreseeable future phases of the Project, that contains sufficient information to evaluate and review the Project's environmental impact (CEQA Guidelines, §§ 15124 & 15378). Please include a complete description of the following Project components in the Project description:

- Land use changes resulting from, for example, rezoning certain areas;
- Footprints of permanent Project features and temporarily impacted areas, such as staging areas and access routes;
- Area and plans for any proposed buildings/structures, ground disturbing activities, fencing, paving, stationary machinery, landscaping, and stormwater systems;
- Operational features of the Project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features; and
- Construction schedule, activities, equipment, and crew sizes.

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Mixed Use Construction

The NOP does not provide specific information on the type of mixed use that is proposed on opportunity sites 301 so it is assumed infrastructure constructed over the water will be proposed. It is also assumed that overwater construction may involve pile driving and/or dredging to make the structure accessible by land and/or water. Pile driving, specifically using an impact hammer, has been shown to create underwater sound levels that exceed the hydroacoustic thresholds set by the Hydroacoustic Fisheries Working Group (See **Attachment 2**) which could cause injury and/or mortality to fish. Additionally, dredging can cause impacts to aquatic habitats and species through direct removal, release of contaminated sediments, and indirect impacts through shading due to increased water turbidity. Depending on dredging methods, impacts may also include entrainment and/or impingement of fish or invertebrates.

CDFW recommends the draft EIR provide specific information on what type of mixed use will be proposed in opportunity sites 301 and how the mixed-use areas are being incorporated into an amendment to the Sausalito General Plan that is intended to analyze the goals, policies, and future actions to address existing and projected housing needs of the City. Please include specific information on the types of infrastructure that may be considered on opportunity sites 301 and the specific types of construction methods that may be used or considered.

ENVIRONMENTAL SETTING

The EIR should provide sufficient information regarding the environmental setting (“baseline”) to understand the Project’s, and its alternative’s (if applicable), potentially significant impacts on the environment (CEQA Guidelines, §§ 15125 & 15360).

CDFW recommends that the CEQA document prepared for the Project provide baseline habitat assessments for special-status plant, fish and wildlife species located and potentially located within the Project area and surrounding lands, including but not limited to, all rare, threatened, or endangered species (CEQA Guidelines, § 15380). The EIR should describe aquatic habitats, such as wetlands or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site (for sensitive natural communities see:

<https://wildlife.ca.gov/Data/VegCAMP/NaturalCommunities#sensitive%20natural%20communities>), and any stream or wetland set back distances the City may require. Fully protected, threatened or endangered, candidate, and other special-status species that are known to occur, or have the potential to occur in or near the Project site, include but are not limited to, those listed in **Attachment 1**.

Habitat descriptions and the potential for species occurrence included in the EIR should include robust information from multiple sources: aerial imagery, historical and recent

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survey data, field reconnaissance, scientific literature and reports, U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation System, California Aquatic Resources Inventory, and findings from "positive occurrence" databases such as California Natural Diversity Database (CNDDDB). Only with sufficient data and information from the habitat assessment, can the City adequately assess which special-status species are likely to occur on or near the Project site, and whether they could be impacted by the Project.

CDFW recommends that prior to Project implementation, surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at: <https://www.wildlife.ca.gov/Conservation/Survey-Protocol>.

Botanical surveys for special-status plant species, including those with a California Rare Plant Rank (<http://www.cnps.org/cnps/rareplants/inventory/>)¹, must be conducted during the blooming period within the Project area and adjacent habitats that may be indirectly impacted by, for example, changes to hydrological conditions, and require the identification of reference populations. More than one year of surveys may be necessary based on environmental conditions. Please refer to CDFW protocols for surveying and evaluating impacts to special status plants available at: <https://www.wildlife.ca.gov/Conservation/Plants>.

Marine Biological Significance

The San Francisco Bay-Delta is the second largest estuary in the United States and supports numerous aquatic habitats and biological communities. It encompasses 479 square miles, including shallow mudflats. This ecologically significant ecosystem supports both state and federally threatened and endangered species and sustains important commercial and recreational fisheries.

Eelgrass

Native eelgrass beds (*Zostera marina*) are an important part of the San Francisco Bay ecosystem and are recognized by state and federal statutes as both highly valuable and sensitive habitats. Eelgrass provides primary production and nutrients to the ecosystem along with spawning, foraging, and nursery habitat for fish and other species. Pursuant to the federal Magnuson-Stevens Fishery Conservation and Management Act, eelgrass is designated as Essential Fish Habitat for various federally managed fish species within the Pacific Coast Groundfish and Pacific Coast Salmon Fisheries Management Plans

¹ California Rare Plant Rank (CRPR) 1B plants are considered rare, threatened, or endangered in California and elsewhere. Further information on CRPR ranks is available in CDFW's *Special Vascular Plants, Bryophytes, and Lichens List* (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109383&inline>) and on the California Native Plant Society website (<https://www.cnps.org/rare-plants/cnps-rare-plant-ranks>).

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(FMP). Eelgrass is also considered a habitat area of particular concern for various species within the Pacific Coast Groundfish FMP. Eelgrass habitats are further protected under state and federal “no-net-loss” policies for wetland habitats and are also listed by CDFW as a Sensitive Natural Community with a vulnerable listing status (State Rank S3). Additionally, the importance of eelgrass protection and restoration, as well as, the ecological benefits of eelgrass, is identified in the California Public Resources Code (Pub. Resource Code, § 35630).

The NOP shows opportunity sites 301 as potential mixed use. These opportunity sites in Richardson Bay contain multiple acres of eelgrass habitat that provide spawning habitat for Pacific herring and rearing habitat for Dungeness crab. Any overwater construction or dredging within these opportunity sites will impact eelgrass habitat.

IMPACT ANALYSIS AND MITIGATION MEASURES

The EIR should discuss all direct and indirect impacts (temporary and permanent) that may occur with implementation of the Project (CEQA Guidelines, § 15126.2). This includes evaluating and describing impacts such as:

- Land use changes that would reduce open space or agricultural land uses and increase residential or other land use involving increased development;
- Encroachments into riparian habitats, wetlands or other sensitive areas;
- Potential for impacts to special-status species;
- Loss or modification of breeding, nesting, dispersal and foraging habitat, including vegetation removal, alternation of soils and hydrology, and removal of habitat structural features (e.g., snags, roosts, vegetation overhanging banks);
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic or human presence; and
- Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features.

The EIR should also identify existing and reasonably foreseeable future projects in the Project vicinity, disclose any cumulative impacts associated with these projects, determine the significance of each cumulative impact, and assess the significance of the Project’s contribution to each impact (CEQA Guidelines, §15355). Although a project’s impacts may be insignificant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact – e.g.,

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reduction of available habitat for a special-status species – should be considered cumulatively considerable without mitigation to minimize or avoid the impact.

The CEQA Guidelines direct the City, as the Lead Agency, to consider and describe in the EIR all feasible mitigation measures to avoid and/or mitigate potentially significant impacts of the Project on the environment based on comprehensive analysis of the direct, indirect, and cumulative impacts of the Project (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370). This should include a discussion of impact avoidance and minimization measures for special-status species, which are recommended to be developed in early consultation with CDFW, USFWS, and the National Marine Fisheries Service. These measures can then be incorporated as enforceable Project conditions to reduce potential impacts to biological resources to less-than-significant levels.

The draft EIR should include mitigation measures to avoid potential impacts to aquatic species for construction methods such as pile driving and dredging, including the following measures:

- In-water construction shall only occur during the CDFW approved work window of June 1 through November 30. Additional work window restrictions may apply for;
- A vibratory pile driver shall be used to the maximum extent possible;
- An impact hammer shall only be used if necessary and should include sound attenuation devices such as a wood cushion block and/or bubble curtain; and
- If an impact hammer is to be considered for construction, the City shall consult with CDFW regarding a CESA ITP for potential impacts to state listed species such as longfin smelt and Chinook salmon.

The draft EIR should include measures that will avoid and minimize the potential impacts to eelgrass habitat identified in opportunity sites 301. If avoidance and minimize measures will not fully prevent impacts to eelgrass, the draft EIR should include measures to mitigate potential impacts to eelgrass habitat.

ENVIRONMENTAL DATA

CEQA requires that information developed in EIRs and negative declarations be incorporated into a database 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 CNDDDB. The CNDDDB online field survey form and other methods for submitting data can be found at the following link:

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<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link:
<https://wildlife.ca.gov/Data/CNDDDB/Plantsand-Animals>.

FILING FEES

CDFW anticipates that the proposed Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary to defray the costs of CDFW's review under CEQA (Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency.

If you have any questions, please contact Alexander Single, Environmental Scientist, at (707) 980-5154 or by email at Alexander.Single@wildlife.ca.gov; or Melanie Day, Senior Environmental Scientist (Supervisory), at (707) 210-4415 or by email at Melanie.Day@wildlife.ca.gov.

Sincerely,

DocuSigned by:

Erin Chappell
Regional Manager
Bay Delta Region

Attachment 1: Special-Status Species and Commercially/Recreationally Important Species

Attachment 2: Agreement in Principle for Interim Criteria for Injury to Fish from Pile Driving Activities

cc: Office of Planning and Research, State Clearinghouse (SCH No. 2023050516)
Becky Ota, CDFW Marine Region – Becky.Ota@wildlife.ca.gov
Eric Wilkins, CDFW Marine Region – Eric.Wilkins@wildlife.ca.gov
Arn Aarreberg, CDFW Marine Region – Arn.Aarreberg@wildlife.ca.gov

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Attachment 1:

Special-Status Species and Commercially/Recreationally Important Species

Species Name	Common Name	Status
<i>Oncorhynchus kisutch</i>	Coho salmon - Central California Coast Evolutionarily Significant Unit (ESU)	FE, SE
<i>Oncorhynchus tshawytscha</i>	Chinook salmon - Sacramento River Winter-run ESU	FE, SE
<i>Oncorhynchus tshawytscha</i>	Chinook salmon - Central Valley Spring-run ESU	FT, ST
<i>Oncorhynchus mykiss</i>	steelhead – Central California Coast ESU	FT
<i>Oncorhynchus mykiss</i>	steelhead – Central Valley ESU	FT
<i>Riparia riparia</i>	bank swallow	ST
<i>Spirinchus thaleichthys</i>	longfin smelt	FC, ST
<i>Rana draytonii</i>	California red-legged frog	FT, SSC
<i>Eucyclogobius newberryi</i>	tidewater goby	FE
<i>Acipenser medirostris</i>	green sturgeon - southern Distinct Population Segment (DPS)	FT
<i>Enhydra lutris nereis</i>	southern sea otter	FP, FT
<i>Pelecanus occidentalis californicus</i>	brown pelican	FP
<i>Danaus plexippus plexippus</i>	monarch - California overwintering population	FC
<i>Acipenser transmontanus</i>	white sturgeon	SSC
<i>Dicamptodon ensatus</i>	California giant salamander	SSC
<i>Rana boylei</i>	foothill yellow-legged frog - north coast DPS	SSC
<i>Taxidea taxus</i>	American badger	SSC
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	SSC
<i>Emys marmorata</i>	western pond turtle	SSC

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<i>Cancer magister</i>	Dungeness crab	Fisheries
<i>Clupea pallasii</i>	Pacific herring	Fisheries
<i>Embiotocidae sp.</i>	surfperches	Fisheries
<i>Paralichthys californicus</i>	California halibut	Fisheries
<i>Sebastes sp.</i>	rockfish	Fisheries
<i>Arenaria paludicola</i>	marsh sandwort	FE, SE, CRPR 1B.1
<i>Holocarpha macradenia</i>	Santa Cruz tarplant	FT, SE, CRPR 1B.1
<i>Hesperolinon congestum</i>	Marin western flax	FT, ST, CRPR 1B.1
<i>Gilia capitata ssp. chamissonis</i>	blue coast gilia	CRPR 1B.1
<i>Horkelia cuneata var. sericea</i>	Kellogg's horkelia	CRPR 1B.1
<i>Leptosiphon rosaceus</i>	rose leptosiphon	CRPR 1B.1
<i>Fritillaria lanceolata var. tristulis</i>	Marin checker lily	CRPR 1B.1
<i>Triquetrella californica</i>	coastal triquetrella	CRPR 1B.2
<i>Fissidens pauperculus</i>	minute pocket moss	CRPR 1B.2
<i>Plagiobothrys chorisianus var. chorisianus</i>	Choris' popcornflower	CRPR 1B.2
<i>Calystegia purpurata ssp. saxicola</i>	coastal bluff morning-glory	CRPR 1B.2
<i>Hemizonia congesta ssp. congesta</i>	congested-headed hayfield tarplant	CRPR 1B.2
<i>Gilia millefoliata</i>	dark-eyed gilia	CRPR 1B.2
<i>Helianthella castanea</i>	Diablo helianthella	CRPR 1B.2
<i>Cirsium andrewsii</i>	Franciscan thistle	CRPR 1B.2
<i>Arctostaphylos virgata</i>	Marin manzanita	CRPR 1B.2
<i>Microseris paludosa</i>	marsh microseris	CRPR 1B.2

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<i>Amorpha californica</i> var. <i>napensis</i>	Napa false indigo	CRPR 1B.2
<i>Horkelia marinensis</i>	Point Reyes horkelia	CRPR 1B.2
<i>Chloropyron maritimum</i> ssp. <i>palustre</i>	Point Reyes salty bird's-beak	CRPR 1B.2
<i>Chorizanthe cuspidata</i> var. <i>cuspidata</i>	San Francisco Bay spineflower	CRPR 1B.2
<i>Collinsia multicolor</i>	San Francisco collinsia	CRPR 1B.2
<i>Stebbinsoseris decipiens</i>	Santa Cruz microseris	CRPR 1B.2
<i>Horkelia tenuiloba</i>	thin-lobed horkelia	CRPR 1B.2
<i>Eriogonum luteolum</i> var. <i>caninum</i>	Tiburon buckwheat	CRPR 1B.2
<i>Arctostaphylos montana</i> ssp. <i>montana</i>	Mt. Tamalpais manzanita	CRPR 1B.3
<i>Quercus parvula</i> var. <i>tamalpaisensis</i>	Tamalpais oak	CRPR 1B.3
<i>Hypogymnia schizidiata</i>	island tube lichen	CRPR 1B.3
<i>Calamagrostis crassiglumis</i>	Thurber's reed grass	CRPR 2B.1
<i>Polemonium carneum</i>	Oregon polemonium	CRPR 2B.2
<i>Silene scouleri</i> ssp. <i>scouleri</i>	Scouler's catchfly	CRPR 2B.2
<i>Carex praticola</i>	northern meadow sedge	CRPR 2B.2
<i>Heteranthera dubia</i>	water star-grass	CRPR 2B.2
<i>Kopsiopsis hookeri</i>	small groundcone	CRPR 2B.3
<i>Polygonum marinense</i>	Marin knotweed	CRPR 3.1
<i>Zostera marina</i>	eelgrass	Fisheries

FE = federally listed as endangered under the Endangered Species Act (ESA); FT = federally listed as threatened under ESA; FC = federal candidate for listing under ESA; FP = state fully protected under Fish and Game Code; SE = state listed as endangered under CESA; ST = state listed as threatened under CESA; SSC = state Species of Special Concern; CRPR = California Rare Plant Rank; Fisheries = species with important commercial and recreational fisheries value as well as ecological value that could potentially be impacted by Project activities

NOAA's Fisheries Northwest and Southwest Regions *U.S. Fish and Wildlife Service Regions 1 & 8* *California/Washington/Oregon Departments of Transportation* *California Department of Fish and Game* *U.S. Federal Highway Administration*

MEMORANDUM

June 12, 2008

From: Fisheries Hydroacoustic Working Group

Subject: Agreement in Principle for Interim Criteria for Injury to Fish from Pile Driving Activities

To: Applicable Agency Staff

The signatory agencies, identified below, have agreed in principle to use the attached Interim Criteria for Injury to Fish from Pile Driving Activities. The agreement was concluded at a meeting in Vancouver, Washington on June 10-11, 2008 with key technical and policy staff from the Federal Highway Administration, NOAA Fisheries, U.S. Fish and Wildlife Service, the Departments of Transportation from California, Oregon, and Washington; and national experts on sound propagation activities that affect fish and wildlife species of concern. The agreed upon criteria identify sound pressure levels of 206 dB peak and 187 dB accumulated sound exposure level(SEL) for all listed fish except those that are less than 2 grams. In that case, the criteria for the accumulated SEL will be 183 dB.

These criteria will apply to all new projects beginning no later than 60 days from the date of this memorandum. During the interim 60 day period, the Transportation Agencies will work with the Services to identify projects currently in the consultation process and reach agreement on which criteria will be used to assess project effects.

The agencies agree to review the science periodically and revise the threshold and cumulative levels as needed to reflect current information. Behavioral impacts to fish and impacts to marine mammals are not addressed in this agreement. Sub-injurious effects will continue to be discussed in future meetings.

The respective agencies also agree to develop appropriate training for staff on these revised criteria, as well as a process to review and possibly refine the criteria, when appropriate.

For questions or concerns about the revised criteria, we recommend staff contact their agency environmental coordinator or agency expert on pile driving issues.

Carol G. Adkins



Federal Highway Administration*

*FHWA supports the use of these interim criteria in the states signing this agreement in principle. FHWA leaves the schedule for implementation to the discretion of the state DOTs in cooperation with their respective FHWA Division Offices and the Services.

Michael Jehan



NOAA Fisheries – NWR

Russell M. Strock



NOAA Fisheries – SWR

Ken S. Berg



US Fish and Wildlife Service Region 1

Michael E. Payer



US Fish and Wildlife Service Region 8

[Signature]



California Department of Transportation

[Signature]



California Department of Fish and Game

A. G. [Signature] Geo-Environmental Mgr



Oregon Department of Transportation

Megan L. Latta

Washington State Department of Transportation



FHWG Agreement in Principle
Technical/Policy Meeting Vancouver, WA
June, 11 2008

Interim Criteria for Injury	Agreement in Principle
Peak	206 dB (for all size of fish)
Cumulative SEL	187 dB - for fish size of two grams or greater. 183 dB - for fish size of less than two grams.*

**see Table—to be developed*