



San Diego County  
**Air Pollution  
Control District**

July 8, 2025

Craig Shuman, D. Env Marine Regional Manager  
California Department of Fish and Wildlife Marine Region  
1933 Cliff Drive, Suite 9  
Santa Barbara, CA 93109

RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR  
THE AUSTAL USA FLOATING DRY DOCK PROJECT

Dear Mr. Shuman,

The San Diego County Air Pollution Control District (SDAPCD) appreciates the comments provided by California Department of Fish and Wildlife (CDFW) on the Draft Environmental Impact Report (EIR) for the proposed project. Responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality Act (CEQA) guidelines. All comments will be provided to the SDAPCD Air Pollution Control Officer prior to their consideration of the EIR for certification. A copy of CDFW's comment letter dated June 10, 2025, is included as an attachment.

Sincerely,

***Eric Luther – Supervising Air Resources Specialist***

*Eric Luther*

Attachment A: CDFW Comment Letter dated June 10, 2025

The SDACPD appreciates the CDFW's comment letter dated June 10, 2025 on the Draft EIR dated April 29, 2025, and responses to these comments are provided below.

**Response to Comment CDFW-1:** CDFW recommends SDAPCD describe how seawater would be pumped into the integral ballast tanks in a manner that minimizes impacts to marine life. Below is a summary of how the ballast tanks are filled and how impacts are inherently minimized.

Integral ballast tanks are filled with water through a gravity-fed system to allow the floating dry dock (FDD) to submerge (i.e., sink) for vessels to dock. A slotted screen is installed on the external surface of the FDD. This screen is designed to keep large objects from being entrained. Behind the screens are intake pipes leading to 12-inch valves. These 12-inch valves feed water into the ballast tanks. When the valves are opened, water from the surrounding area flows directly inwards. No electric pumps are involved in this part of the evolution. Additional specifications related to the water intake system including but not limited to the maximum volume of water held in the ballast tanks, number of valves that feed water from San Diego Bay into the ballast tanks, intake velocities, screen size, and structure placement are provided in Section 2.5.3.2 of the Final FEIR.

The operational design of the project minimizes impacts to marine life in part because of the temporary nature of filling the ballast tanks. The potential interaction between the intake valves and organisms that may be entrained or impinged is inherently reduced because docking evolutions would occur no more than 4 times annually (a single evolution involves the filling of ballast tanks twice). Potential exposure is also reduced, as the ballast tank valves are only opened during submergence operations. During normal operations, the submergence of the FDD takes 45 minutes. The initial submergence would take no more than 120 minutes. This extended duration accounts for additional time needed to fill the empty ballast tanks and fully submerge the FDD from its initial dry state, without residual ballast water. For the subsequent submergence cycles, valves would only be open for 45 minutes because residual ballast water would be retained from the initial submergence. When the FDD is not in use between evolutions, it remains in a floating position and valves remain closed. Additional details are included in Section 2.5.3.2 of the Final EIR.

The project site is in a previously dredged, deep subtidal habitat. It lacks eelgrass and attached algae. This habitat is comparatively less suitable for marine organisms, including species of commercial, recreational, and biological importance, than other more vegetated



(and productive) parts of San Diego Bay. Information that further supports this claim, and how the project site lends itself to a less than significant effects determination, is provided in Section 3.3.4 Threshold 1 Operations Impacts of the Final EIR.

CDFW expressed concern that the Draft EIR does not address how the FDD complies with regulatory requirements for screens to reduce potential impingement and entrainment of marine life and recommends the project use screens on the seawater intakes that comply with the Department of Fish and Game Fish Screening Criteria from June 19, 2000. However, the installation of fish screens that comply with these criteria is not a regulatory requirement for this project because CDFW is not issuing take permits and no listed species within CDFW's jurisdiction are present. In addition, based on discussions with CDFW on June 23, 2025, it was clarified and confirmed there are no regulatory requirements for screens, but rather the screening criteria from June 19, 2000, are recommendations.

The recommendation to use CDFW's fish screens would limit the operational efficiency of the FDD and compromise safety. The screens would restrict the flow rate into the ballast tank, increasing the time it takes to flood the ballast tanks and thus the duration of each evolution. A longer evolution can also become a safety concern in the event of inclement weather, where a vessel needs to be docked or undocked efficiently. The fish screens may also increase the likelihood of clogging the intake system with debris. A clog prohibiting a ballast tank from being filled could halt the drydocking evolution, thus posing an operational safety risk for FDD and the Government vessel itself.

Austal USA will continue investigating methods to minimize effects on marine organisms and collaborate with CDFW to minimize impacts to marine life. Per CDFW's recommendation and as discussed on June 23, 2025, Austal USA will further look into other methods of deterrence to be used during the time ballast tanks are being filled.

**Response to Comment CDFW-2:** SDAPCD agrees that the project would result in in-water construction activity that would cause disturbance to the marine environment and, if present within the construction area, could result in spread of Caulerpa. In compliance with requirements of Austal USA's U.S. Army Corps of Engineers River and Harbors Act Section 10 and Marine Protection, Research and Sanctuaries Act Section 103 permit, and the San Diego Regional Water Quality Control Board Clean Water Act Section 401 Water Quality Certification, a pre-construction survey of the project area for Caulerpa would be conducted. Per the protocol, Austal USA would conduct a Caulerpa survey no earlier than



90 calendar days prior to planned work and not later than 30 calendar days prior to construction.

The Final EIR has been updated to provide additional discussion regarding Caulerpa pre-construction survey requirements in Section 3.3.4, Threshold 2, Construction Impacts. It has also been added as a minimization measure to Table 2-1 as “BIO-7: Conduct pre-construction Caulerpa survey”. Austal USA shall furnish the results of the survey to the U.S. Army Corps of Engineers Regulatory Division, National Oceanic and Atmospheric Administration Fisheries, and CDFW at least 15 calendar days prior to initiation of work in navigable waters. Should any Caulerpa be detected, work would not commence until such time as the infestation has been isolated, treated, and the risk of spread is eliminated.

It should be noted that a protocol survey for Caulerpa was last conducted in May 2023 and no Caulerpa was found. This information has been provided in the updates to the Final EIR in Section 3.3.1

**Response to Comment CDFW-3:** SDAPCD has reviewed this requirement with Austal USA. If any special status species or natural communities are observed during any project survey, Austal USA would report observations via the CNDDDB Field Survey Form for inclusion within the CNDDDB.

**Response to Comment CDFW-4:** SDAPCD has reviewed this requirement with Austal USA and would ensure the Fish and Game Filing Fees are paid at the time of submittal of the Notice of Determination (NOD) to the County Clerk.

**Response to Comment CDFW-5:** During preparation of the Draft EIR and in consideration of CDFW’s scoping comments (letter dated September 30, 2024), SDAPCD coordinated with National Marine Fisheries Service (NMFS) West Coast Region (B. Chesney, personal communication, December 31, 2024) regarding the latest fish screening criteria and SDAPCD confirmed that San Diego Bay does not support anadromous fish populations and the NMFS Southwest Region’s Fish Screening Criteria for Anadromous Salmonids does not directly apply to proposed project. This coordination effort and confirmation with NMFS were included in Section 3.3.1 of the Draft EIR. As discussed in the response to comment CDFW-1, Austal USA would voluntarily continue to coordinate with CDFW regarding potential ways to minimize the FDD ballast tank operations on general aquatic life within the bay. Please refer to the response to comment CDFW-1 for additional details.

## Attachment A: CDFW Comment Letter dated June 10, 2025



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Marine Region  
1933 Cliff Drive, Suite 9  
Santa Barbara, CA 93109  
www.wildlife.ca.gov

GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



June 10, 2025

Eric Luther  
Supervising Air Resources Specialist  
San Diego County Air Pollution Control District  
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### **AUSTAL USA FLOATING DRY DOCK PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT SCH #2024090037**

Dear Mr. Luther:

The California Department of Fish and Wildlife (Department) received a Draft Environmental Impact Report (DEIR) from the San Diego County Air Pollution Control District (District) for the Austal USA Floating Dry Dock Project (Project), pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project 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, section 711.7, subd. (a) & 1802; Pub. Resources Code, section 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 adversely affect fish and wildlife resources. The Department is also responsible for marine biodiversity protection under the Marine Life Protection Act in coastal marine

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<sup>1</sup> 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.

*Conserving California's Wildlife Since 1870*

## Attachment A: CDFW Comment Letter dated June 10, 2025

Eric Luther  
San Diego County Air Pollution Control District  
June 10, 2025  
Page 2 of 6

waters of California, and ensuring fisheries are sustainably managed under the Marine Life Management Act.

### PROJECT DESCRIPTION SUMMARY

**Proponent:** Austal USA

**Objective:** The Project proposes to add a new floating dry dock to support operations, ship repair, and maintenance for governmental and commercial customers, including the United States Department of the Navy, at a location adjacent to the Naval Base San Diego. The proposed Project will be operated by Austal USA and includes the construction of a wharf, mooring dolphin piers, and the floating dry dock emplacement. The floating dry dock was constructed offsite and is currently moored at the Austal USA facility in the water south of the South Pier. Dredging to facilitate installation and operation of the proposed floating dry dock and installation of in-water piles to support a concrete wharf have been completed in accordance with the United States Army Corps of Engineers and San Diego Regional Water Quality Control Board requirements at the Austal USA facility.

Primary Project activities include the use of specialized overwater construction equipment such as floating cranes, barges, tugboats, and hydraulic vibrators and/or diesel-powered impact hammers. In-water work to support the floating dry dock includes installing two mooring dolphin piers located forward and aft of the floating dry dock and a concrete wharf ramp that would extend from the bulkhead toward the floating dry dock. The concrete wharf would be supported by 33 24-inch octagonal concrete piles (three of which are currently pending installation). The mooring dolphins would each be supported by 24-inch octagonal concrete piles and 22 concrete piles would be installed to support the mooring dolphins. For the mooring dolphins, 12 steel H piles would be installed to support the templates for the concrete piles and will be removed once the concrete piles have been installed. An additional 10 steel H piles would be installed permanently on the offshore mooring dolphin as part of the fender system. The DEIR indicated that concrete piles would be installed using an impact pile driver and steel H piles would be installed using a vibratory hammer. The floating dry dock will be transported using two tugboats with up to 1,000 horsepower and grippers would be secured to the mooring dolphin's concrete pile caps to hold the floating dry dock in position. The floating dry dock emplacement would shade approximately 2.1 acres of deep subtidal habitat that was created by past dredging.

The proposed Project's operational activities include the floating dry dock vessel repair and maintenance, lowering and raising of the floating dry dock (i.e., dry-docking evolutions), dry dock maintenance, pedestrian and vehicle traffic access/parking, utilities, saltwater fire suppression, North Pier and South Pier activities, and emergency engines waste disposal. Dry-docking evolutions would be accomplished via integral ballast tanks that would be pumped with seawater to submerge the floating dry dock and drained to float the dry dock. Vessels would be moved into and out of the floating

## Attachment A: CDFW Comment Letter dated June 10, 2025

Eric Luther  
San Diego County Air Pollution Control District  
June 10, 2025  
Page 3 of 6

dry dock by tugboats and dry-docking evolutions would occur up to four times per year. Maintenance activities of the floating dry dock may include touchup painting, maintenance of equipment, tank cleaning, sheet metal work, electrical work, mechanical repair, and repair/replacement of valves and fittings. Vessel repair and maintenance activities at the proposed floating dry dock may include abrasive blasting, hydro-blasting, metal grinding, painting, tank cleaning, removal of bilge and ballast water, removal of anti-fouling paint, sheet metal work, electrical work, mechanical repair, engine repair, hull repair, shaft repair, propeller and rudder repair, repair/replacement of the sea valves and fittings below the waterline, and sewage disposal.

**Location:** The Project site is located at 1313 Bay Marina Drive, National City, California 91950. The proposed Project site is immediately south of and adjacent to Naval Base San Diego (NBSD, 32<sup>nd</sup> Street Naval Station), and immediately north of and adjacent to the Port of San Diego's National City Marine Terminal in San Diego Bay, San Diego County, California.

**Timeframe:** The anticipated construction start date was not included in the DEIR, but the proposed construction activities would occur over a period of approximately 8 weeks.

### **BIOLOGICAL SIGNIFICANCE**

**Discussion and Comment:** The San Diego Bay waters support many resident and migratory fish and special status wildlife such as seabirds, marine mammals, and sea turtles. Important marine plants such as eelgrass (*Zostera marina*) support those fish and wildlife species and may be present throughout shallow coastal environments in the San Diego Bay. Eelgrass is important as fish nursery habitat and supports juvenile and adult fish. The San Diego Bay waters also support commercially and recreationally important fish and invertebrate species such as California halibut (*Paralichthys californicus*), California spiny lobster (*Panulirus interruptus*), and Northern anchovy (*Engraulis mordax*), which is an important forage fish.

### **COMMENTS AND RECOMMENDATIONS**

The Department offers the comments and recommendations below to assist the District in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife resources.

#### **I. Project Level Impacts and Other Considerations**

##### **Floating Dry Dock Operations**

**Comments:** The DEIR noted that dry-docking evolutions would be accomplished using integral ballast tanks that would be filled using an electric pump with seawater to submerge the floating dry dock. Dry-docking evolutions may directly harm and/or

CDFW-1

## Attachment A: CDFW Comment Letter dated June 10, 2025

Eric Luther  
San Diego County Air Pollution Control District  
June 10, 2025  
Page 4 of 6

cause mortality to marine organisms via entrainment or impingement as water is drawn into the ballast tanks. Entrainment occurs when smaller organisms such as algae, plankton, fish larvae, and eggs pass through intake screens and perish during the high pressure of floating dry dock operations. Impingement occurs when organisms become trapped against intake screens by the suction power as water is drawn into the system. The DEIR noted that it is unlikely that dry-docking evolutions would cause a significant adverse effect on marine species in San Diego Bay and evolutions are expected to occur up to four times per year. However, the Department remains concerned that the DEIR does not address how the floating dry dock operations will comply with regulatory requirements for screens to reduce potential impingement and entrainment of marine life.

CDFW-1  
continued

**Recommendations:** The Department recommends that the floating dry dock operations use screens on seawater intakes to minimize the entrainment and impingement of species, including species of commercial, recreational, and biological importance. All intake screens should meet the Department fish screening criteria (Attachment 1). Screen criteria for structure placement, approach velocity, sweeping velocity, screen openings, and screen construction should be detailed in the Final EIR in accordance with the Department's fish screening criteria. The Department recommends that the District describe how seawater will be pumped into the integral ballast tanks in a manner that minimizes impacts to marine life.

### Invasive Species Impacts

**Comments:** Disturbance of the bottom sediments from pile construction and anchoring may redistribute non-native species that compete with native species. This could cause widespread adverse impacts to eelgrass and marine ecology. The invasive alga *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 alga species found recently in Newport Bay and San Diego Bay is *Caulerpa prolifera*, which is also a potential threat to growth and expansion of native eelgrass beds and other native algae. *Caulerpa prolifera* can grow as deep as 50 meters and appears to be more tolerant of low light environments than most other macroalgae. Additionally, since all *Caulerpa* species pose a serious risk in harming native marine life, Fish and Game Code Section 2300 was amended in 2023 so that no person shall sell, possess, import, transport, transfer, release alive in the state, or give away without consideration all species of the genus *Caulerpa*, with the exception of bona fide scientific research upon authorization by the Department. The Department remains concerned that the DEIR did not discuss or acknowledge *Caulerpa* spp. as an invasive species impact in the Project area and did not indicate whether the District plans to conduct pre-construction *Caulerpa* spp. surveys.

CDFW-2

**Recommendations:** The Department recommends conducting pre-construction *Caulerpa* spp. surveys to identify potential existence of invasive *Caulerpa* spp. in accordance with the *Caulerpa* Control Protocol

**Attachment A: CDFW Comment Letter dated June 10, 2025**

Eric Luther  
San Diego County Air Pollution Control District  
June 10, 2025  
Page 5 of 6

<https://media.fisheries.noaa.gov/2021-12/caulerpa-control-protocol-v5.pdf> (October 2021). Any sightings of *Caulerpa spp.* should be reported within 24 hours to the Department ([Caulerpa@wildlife.ca.gov](mailto:Caulerpa@wildlife.ca.gov)), and National Marine Fisheries Service at 562-980-4037 ([nmfs.wcr.caulerpa@noaa.gov](mailto:nmfs.wcr.caulerpa@noaa.gov)).

CDFW-2  
continued

**ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, section 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

CDFW-3

**ENVIRONMENTAL DOCUMENT FILING FEES**

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document 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 the Department. Payment of the environmental document filing fee is required for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, section 753.5; Fish & G. Code, section 711.4; Pub. Resources Code, section 21089.)

CDFW-4

**CONCLUSION**

The Department appreciates the opportunity to comment on the DEIR to assist the District in identifying and mitigating Project impacts on biological resources. Questions regarding this letter or further coordination should be directed to Leslie Hart, Environmental Scientist at [R7CEQA@wildlife.ca.gov](mailto:R7CEQA@wildlife.ca.gov).

Sincerely,



Craig Shuman, D. Env  
Marine Regional Manager

ec: Claire Waggoner, Environmental Program Manager  
Department of Fish and Wildlife

Eric Wilkins, Senior Environmental Scientist  
Department of Fish and Wildlife

**Attachment A: CDFW Comment Letter dated June 10, 2025**

Eric Luther  
San Diego County Air Pollution Control District  
June 10, 2025  
Page 6 of 6

Office of Planning and Research, State Clearinghouse  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)

**ATTACHMENT**

Attachment 1: Department of Fish and Wildlife. 2011. Fish Screening Criteria.

DEPARTMENT OF FISH AND GAME  
FISH SCREENING CRITERIA  
June 19, 2000

1. STRUCTURE PLACEMENT

**A. Streams And Rivers (flowing water):** The screen face shall be parallel to the flow and adjacent bankline (water's edge), with the screen face at or streamward of a line defined by the annual low-flow water's edge.

The upstream and downstream transitions to the screen structure shall be designed and constructed to match the bankline, minimizing eddies upstream of, in front of, and downstream of, the screen.

Where feasible, this "on-stream" fish screen structure placement is preferred by the California Department of Fish and Game.

**B. In Canals (flowing water):** The screen structure shall be located as close to the river source as practical, in an effort to minimize the approach channel length and the fish return bypass length. This "in canal" fish screen location shall only be used where an "on-stream" screen design is not feasible. This situation is most common at existing diversion dams with headgate structures.

The National Marine Fisheries Service - Southwest Region "Fish Screening Criteria for Anadromous Salmonids, January 1997" shall be used for these types of installations.

**C. Small Pumped Diversions:** Small pumped diversions (less than 40 cubic-feet per second) which are screened using "manufactured, self-contained" screens shall conform to the National Marine Fisheries Service - Southwest Region "Fish Screening Criteria for Anadromous Salmonids, January 1997."

**D. Non-Flowing Waters (tidal areas, lakes and reservoirs):** The preferred location for the diversion intake structure shall be offshore, in deep water, to minimize fish contact with the diversion. Other configurations will be considered as exceptions to the screening criteria as described in Section 5.F. below.

2. APPROACH VELOCITY (Local velocity component perpendicular to the screen face)

**A. Flow Uniformity:** The design of the screen shall distribute the approach velocity uniformly across the face of the screen. Provisions shall be made in the design of the screen to allow for adjustment of flow patterns. The intent is to ensure uniform flow distribution through the entire face of the screen as it is constructed and operated.

**B. Self-Cleaning Screens:<sup>1</sup>**

The U.S. Fish and Wildlife Service has selected a 0.2 feet per second approach velocity for use in waters where the Delta smelt is found. Thus, fish screens in the Sacramento-San Joaquin Delta and San Francisco Estuary should use this criterion for design purposes. In addition:

1. Streams and Rivers (flowing waters) - exposure to the fish screen shall not exceed fifteen minutes.

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<sup>1</sup> Approach velocities in the June 19, 2000 Fish Screening Criteria that are inapplicable if delta smelt are present are omitted.

DEPARTMENT OF FISH AND GAME  
FISH SCREENING CRITERIA

June 19, 2000

2. In Canals (flowing waters) - a bypass entrance shall be located every one-minute of travel time along the screen face.

3. Non-Flowing Waters (tidal areas, lakes and reservoirs) - The specific screen approach velocity shall be determined for each installation, based on the delta smelt life stage being protected. Velocities which exceed those described above will require a variance to these criteria (see Section 5.F. below).

**C. Screens Which Are Not Self-Cleaning:** The screens shall be designed with an approach velocity one-fourth that outlined in Section B. above. The screen shall be cleaned before the approach velocity exceeds the criteria described in Section B.

**D. Frequency Of Cleaning:** Fish screens shall be cleaned as frequently as necessary to prevent flow impedance and violation of the approach velocity criteria. A cleaning cycle once every 5 minutes is deemed to meet this standard.

**E. Screen Area Calculation:** The required wetted screen area (square feet), excluding the area affected by structural components (i.e., pore space or open area), is calculated by dividing the **maximum** diverted flow (cubic-feet per second) by the allowable approach velocity (feet per second). Example:

**1.0 cubic-foot per second / 0.2 feet per second = 5.0 square feet of pore space**  
Unless otherwise specifically agreed to, this calculation shall be done at the **minimum** stream stage.

**3. SWEEPING VELOCITY (Velocity component parallel to screen face)**

**A. In Streams And Rivers:** The sweeping velocity should be at least two times the allowable approach velocity.

**B. In Canals:** The sweeping velocity shall exceed the allowable approach velocity. Experience has shown that sweeping velocities of 2.0 feet per second (or greater) are preferable.

**C. Design Considerations:** Screen faces shall be designed flush with any adjacent screen bay piers or walls, to allow an unimpeded flow of water parallel to the screen face.

**4. SCREEN OPENINGS**

**A. Porosity:** The screen surface shall have a minimum open area of 27 percent. We recommend the maximum possible open area consistent with the availability of appropriate material, and structural design considerations. The use of open areas less than 40 percent shall include consideration of increasing the screen surface area, to reduce slot velocities, assisting in both fish protection and screen cleaning.

**B. Round Openings:** Round openings in the screening shall not exceed 3.96mm (5/32in). In waters where steelhead rainbow trout fry are present, this dimension shall not exceed 2.38mm (3/32in).

**C. Square Openings:** Square openings in screening shall not exceed 3.96mm (5/32in) measured diagonally. In waters where steelhead rainbow trout fry are present, this dimension shall not exceed 2.38mm (3/32in) measured diagonally.

**D. Slotted Openings:** Slotted openings shall not exceed 2.38mm (3/32in) in width. In waters where steelhead rainbow trout fry are present, this dimension shall not exceed 1.75mm (0.0689in).

DEPARTMENT OF FISH AND GAME  
FISH SCREENING CRITERIA  
June 19, 2000

5. SCREEN CONSTRUCTION

**A. Material Selection:** Screens may be constructed of any rigid material, perforated, woven, or slotted that provides water passage while physically excluding fish. The largest possible screen open area which is consistent with other project requirements should be used. Reducing the screen slot velocity is desirable both to protect fish and to ease cleaning requirements. Care should be taken to avoid the use of materials with sharp edges or projections which could harm fish.

**B. Corrosion and Fouling Protection:** Stainless steel or other corrosion-resistant material is the screen material recommended to reduce clogging due to corrosion. The use of both active and passive corrosion protection systems should be considered. Consideration should be given to anti-fouling material choices, to reduce biological fouling problems. Care should be taken not to use materials deemed deleterious to fish and other wildlife.

**C. Project Review and Approval:** Plans and design calculations, which show that all the applicable screening criteria have been met, shall be provided to the Department before written approval can be granted by the Regional Manager, Bay Delta Region.

The approval shall be documented in writing to the project sponsor, with a copy to the Deputy Director, Resource Management and Policy Division. Such approval may include a requirement for post-construction evaluation, monitoring and reporting.

**D. Assurances:** All fish screens constructed after the effective date of these criteria shall be designed and constructed to satisfy the current criteria. Owners of existing screens, approved by the Department prior to the effective date of these criteria, shall not be required to upgrade their facilities to satisfy the current criteria unless:

1. The controlling screen components deteriorate and require replacement (i.e., change the opening size or opening orientation when the screen panels or rotary drum screen coverings need replacing),
2. Relocation, modification or reconstruction (i.e., a change of screen alignment or an increase in the intake size to satisfy diversion requirements) of the intake facilities, or
3. The owner proposes to increase the rate of diversion which would result in violation of the criteria without additional modifications.

**E. Supplemental Criteria:** Supplemental criteria may be issued by the Department for a project, to accommodate new fish screening technology or to address species-specific or site-specific circumstances.

**F. Variances:** Written variances to these criteria may be granted with the approval of the Regional Manager, Bay Delta Region and concurrence from the Deputy Director, Resource Management and Policy Division. At a minimum, the rationale for the variance must be described and justified in the request. Evaluation and monitoring may be required as a condition of any variance, to ensure that the requested variance does not result in a reduced level of protection for the aquatic resources.

**Attachment A: CDFW Comment Letter dated June 10, 2025**

**DEPARTMENT OF FISH AND GAME  
FISH SCREENING CRITERIA**

**June 19, 2000**

It is the responsibility of the project sponsor to obtain the most current version of the appropriate fish screen criteria. Project sponsors should contact the Department of Fish and Game and the U.S. Fish and Wildlife Service (for projects in anadromous and fresh waters) for guidance.

Copies of the current criteria are available from the Department of Fish and Game Bay Delta Region; 7329 Silverado Trail/P.O. Box 46, Yountville, CA 94599, (707) 944-5500.

Technical assistance can be obtained directly from the Habitat Conservation Branch; 1416 Ninth Street, Sacramento, CA 95814 - (916) 653-1070.

The National Marine Fisheries Service Southwest Region "Fish Screening Criteria for Anadromous Salmonids, January 1997" is available at: <http://swr.ucsd.edu/hcd/fishscrn.htm> and from their Southwest Region, 777 Sonoma Avenue, Room 325, Santa Rosa, CA 95402 - (707) 575-6050.

CDFW-5