



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

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GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

May 20, 2026

Robin Tuohy
Environmental Scientist
Division of Environmental Science, Planning, and Management
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

SUBJECT: AT&T JAPAN–U.S. CABLE NETWORK DECOMMISSIONING (JUS S8 AND JUS S9 CABLES) PROJECT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION SCH # 2026041109

Dear Mrs. Tuohy,

The California Department of Fish and Wildlife (Department) received an Initial Study/ Mitigated Negative Declaration (IS/MND) from the California State Lands Commission (Commission) for the AT&T Japan–U.S. Cable Network Decommissioning (JUS S8 and JUS S9 Cables) Project (Project), pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹ Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the 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) and section 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

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

to provide, as available, biological expertise during public agency environmental review efforts.

The Department is also responsible for marine biodiversity protection under the Marine Life Protection Act in coastal marine waters of California and ensuring fisheries are sustainably managed under the Marine Life Management Act. Similarly, the Department reviews and regulates activities within Marine Protected Areas (MPAs) to ensure consistency with the protections established under Title 14, California Code of Regulations, section 632, which defines allowable uses, prohibits unauthorized take, and safeguards marine habitats and species. State Marine Conservation Areas (SMCAs) are designated under this framework and are subject to site-specific restrictions on allowable activities. Pursuant to section 632(a)(1)(C), it is unlawful to injure, damage, take, or possess any living, geological, or cultural marine resource within an SMCA except as expressly authorized by regulation.

PROJECT DESCRIPTION SUMMARY

Proponent: California State Lands Commission (Commission)

Objective: Primary project activities involve decommissioning three sections of the AT&T Japan–U.S. (JUS) Segments 8 and 9 submarine fiber-optic cable system offshore of San Luis Obispo and Mendocino Counties. Within California waters, the project would remove approximately 7.9 miles of the JUS S8 cable and approximately 9.6 miles of the JUS S9 cable. This work is part of a larger effort to remove approximately 39.9 miles (236.4 tons) of the JUS S8 cable and 79.1 miles (460 tons) of the JUS S9 cable from their seafloor exit points to the 1,000-fathom contour.

Location: The JUS S9 Montaña segment originates at the onshore landing site within Montaña de Oro State Park in San Luis Obispo County and extends westward offshore through California state waters, federal waters, and into international waters to the 1,000-fathom contour in the Pacific Ocean.

The JUS S9 Manchester segment and the JUS S8 segment both originate at the onshore landing site within Manchester State Park in Mendocino County and extend offshore through California state waters, crossing the Point Arena State Marine Conservation Area, and continuing into federal waters. Offshore of Manchester State Park, the two cable alignments diverge, with the JUS S9 Manchester segment trending southwest and the JUS S8 segment trending northwest toward the 1,000-fathom contour in the Pacific Ocean.

Timeframe: July 2026 – September 2026

BIOLOGICAL SIGNIFICANCE

The nearshore marine environments off Mendocino County and San Luis Obispo County support some of the most biologically productive and diverse coastal habitats in California. These areas contain extensive rocky reef systems, kelp forests, surfgrass beds, sandy bottom communities, and intertidal zones that provide essential refuge, foraging habitat, and nursery grounds for numerous fish species, invertebrates, marine mammals, and seabirds. Point Arena SMCA encompasses a high-relief rocky reef complex and one of the most persistent bull kelp habitats remaining along the north coast. These features support diverse assemblages of nearshore rockfishes, lingcod, cabezon, kelp greenling, abalone, sea urchins, and a wide range of macroinvertebrates.

COMMENTS AND RECOMMENDATIONS

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

Point Arena SMCA

Comment: The IS/MND states that the Project is exempt from approval by the Department because the cables are considered a pre-existing artificial structure and removal is an allowable activity consistent with Title 14, California Code of Regulations, section 632. While the Department supports the removal of the cable from the Point Arena SMCA and the removal of the existing infrastructure may qualify as an allowable activity under Title 14, California Code of Regulations, Section 632, once the cables are removed, any future proposal to install fiber-optic cables within the Point Arena SMCA would constitute a new project and would not be considered "operation, maintenance, or repair" of a pre-existing artificial structure.

Recommendation: The Department recommends that any future proposal to install new fiber-optic cable infrastructure be subject to separate review under CEQA and should be planned to be routed outside of any MPA consistent with the allowable uses under Section 632.

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

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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>.

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.)

CONCLUSION

The Department appreciates the opportunity to comment on the IS/MND to assist the Commission in identifying and mitigating Project impacts on biological resources. Questions regarding this letter or further coordination should be directed to Heidi Carpenter, Environmental Scientist at R7CEQA@wildlife.ca.gov.

Sincerely,



Craig Shuman, D. Env
Marine Regional Manager

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