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August 2, 2019

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Mr. Roddy C. Bachman
Commandant (CG-OES-2)
Attn: Vessel and Facility Operating Standards Division
US Coast Guard STOP 7509
2703 Martin Luther King Jr. Avenue SE
Washington, DC 20593-7509

Re: Deepwater Port License Application: Bluewater Texas Terminal, LLC
Notice of intent; notice of public meeting; request for comments.
Docket No. MARAD-2019-0094

Dear Mr. Bachman:

Texas Parks and Wildlife Department (TPWD) has received a notice of intent (NOI) to prepare an environmental impact statement (EIS) for the proposed ownership, construction, operation, and eventual decommissioning of an offshore deepwater port that would be located in Federal waters approximately 15 nautical miles (17.26 statute miles) off the coast of "San Patricio [*sic*] County", Texas in the Gulf of Mexico (GOM) to export domestically produced crude oil. The proposed project involves the design, engineering, and construction of a deepwater port that includes approximately 56.48 miles of pipeline infrastructure and a booster station. The deepwater port would allow for up to two very large crude carriers (VLCCs), or other crude oil carriers, to simultaneous load crude oil at a rate of 40,000 barrels per hour (bph). Single vessel loading operations would be capable of loading up to approximately 80,000 bph. The facility is expected to service 16 VLCCs per month. The project would consist of offshore, inshore, and onshore components.

Offshore Components

Offshore components would include approximately 27.13 miles of two new 30-inch-diameter crude oil pipelines, two SMP buoy systems, two pipeline end manifold (PLEM) systems, and two catenary anchor leg mooring (CALM) systems. Each pipeline would extend from the Mean High Tide (MHT) line of the GOM on San Jose Island and terminate at a pipeline end manifold (PLEM) system connected to an SPM buoy system located approximately 15 nautical miles off the coast of San Jose and Matagorda Islands (Aransas County, Texas) in approximately

89 feet of water in Bureau of Ocean and Energy Management Outer Continental Shelf Matagorda Island Area TX4 lease blocks 698 and 699 of the GOM. Each SPM buoy system and associated PLEM system would be attached to the seafloor by a CALM system comprised of a symmetrically arranged six-leg anchor dual chain configuration extending to twelve 72-inch-diameter pile anchors installed on the seafloor. A vessel would connect to a SPM buoy system via mooring hawsers attached to a rotating table affixed to the SPM buoy system. A moored vessel would transfer crude oil from the SPM buoy system using a floating hose equipped with a marine break-away coupling and strobe lights at 15-foot intervals for detection at night and low-light conditions.

Inshore Components

Inshore components would extend from the MHT line of the GOM on San Jose Island to the MHT line of the western shoreline of Redfish Bay via the Port of Corpus Christi Authority right-of-way that parallels the north side of Highway 361. Inshore components would cross San Jose Island, Lydia Ann Channel, Aransas Channel, Harbor Island, Lighthouse Lakes Park, Stedman Island, Redfish Bay, and the Gulf Intracoastal Waterway. Infrastructure would include approximately 7.15 miles of two new 30-inch-diameter crude oil pipelines connecting to the onshore facility, an approximately 19-acre booster station on Harbor Island and a connection to the offshore pipeline at the interface of San Jose Island and the Gulf of Mexico.

Onshore Components

Onshore infrastructure that would connect the inshore components of the project to a planned multi-use terminal located south of the City of Taft in San Patricio County, Texas consists of approximately 22.20 miles of two new 30-inch-diameter crude oil pipelines. The planned multi-use terminal will consist of multiple inbound and outbound crude oil pipelines, including the two outbound pipelines that would make up the onshore components of this project.

Scope of Environmental Impact Analysis

Based on the information provided, TPWD has concern for potential direct, indirect, and cumulative impacts to emergent wetlands, tidal flats, submerged aquatic vegetation, unvegetated shallow water habitats, marine soft bottoms, native coastal prairies, woodlands, colonial waterbird nesting areas, Gulf beaches, coastal dunes, barrier islands, a public park, a state scientific area, commercial and recreational fishing, wildlife viewing, as well as federal- and state-listed threatened and endangered species and their habitats. To address these concerns, TPWD recommends the Draft EIS include detailed descriptions and evaluations for all phases (construction, operation, and decommissioning) of the project relative to the following:

- An evaluation of direct, indirect, temporary, and cumulative impacts to sensitive coastal resources that would result from the proposed project. Detail Project Maps, as provided in Volume I Appendix A, should include overlays illustrating the location, extent, and type of coastal resources that occur within the vicinity of the project.
- Identify and describe measures that would be taken to avoid and minimize direct, indirect, temporary, and cumulative adverse effects to fish and wildlife and their habitats, including permanent and temporary impacts.
- Potential impacts to all federal- and state-listed rare, threatened, and endangered species and their habitats within a five-mile vicinity of the project.
- Potential impacts to Gulf beaches which provide critical wildlife habitat, such as sea turtle nesting areas and avifauna foraging and roosting areas.
- Potential impacts to commercial and recreational fisheries and associated fishing activities, including both terrestrial and aquatic access routes.
- Potential magnitude of individual and cumulative impacts to egg, larval, and adult states of fish, shellfish, and other aquatic organisms associated with all phases of the project.
- Potential for bird and bat collisions into project infrastructure.
- Potential impacts (physical removal of nesting habitat and disturbance from human foot traffic and machinery use) to bird nesting areas during construction and operation of the proposed project.
- Potential impacts to native coastal prairie vegetation, including barrier island, coastal dunes, depressions, and swales.
- Potential impacts from invasive species and an Invasive Plant Species Control Plan that includes rapid colonizers of disturbed sites, such as Brazilian peppertree (*Schinus terebinthifolia*).
- Potential impacts to public lands and public land uses (e.g., recreation, education, wildlife habitat, conservation, etc.).
- Potential impacts to public access to local parks, state scientific areas, paddling trails, recreational fishing, bird watching, and other outdoor nature-based activities and the development of a Public Access Plan.
- A specific schedule for construction that also identifies when specific construction activities would be initiated and when associated restoration activities would be completed.
- An evaluation of impacts associated with the removal of all offshore, onshore and inshore components of the proposed project resulting from decommissioning activities. The environmental impact statement should not assume that onshore and inshore components will be abandoned in place.
- An evaluation of the individual and cumulative effects of temporary and permanent impacts to recreational and commercial fishing activities including traditional access points such as public parks, kayak launch sites and recreational boat ramps, waterbodies and shorelines.

- An evaluation of individual and cumulative impacts to native woody vegetation from terrestrial land clearing activities that will not be replanted or allowed to re-establish as well as the cumulative effects of unrestored temporary and permanent impacts to terrestrial and aquatic habitats.
- A comprehensive Habitat Restoration Plan that details pre-construction post-construction surveys, reference sites, methods, timing, material sourcing, duration and extent of monitoring activities, success criteria, and adaptive management that will be used to fully restore each terrestrial and aquatic habitat type that may be temporarily affected by the project.
- A comprehensive Compensatory Mitigation Plan that details how unavoidable permanent impacts to aquatic resource functions will be offset in a manner consistent with the Final Mitigation Rule.
- In addition to abandonment in place, potential impacts and cost estimates associated with decommissioning activities that involve the removal and disposal of onshore and inshore components of the project including pipelines, booster station, and other project-related infrastructure.
- A Dredged Material Management Plan for all phases/portions of the project, including decommissioning activities, that includes the size and draft of all equipment that would be used to handle excavated sediments and the minimum water depths located within the work corridors, access routes, and staging areas.
- The potential to re-suspend and redistribute contaminants (including sediments) during all phases of the project that includes facility removal during decommissioning activities; an evaluation of impacts associated with those re-suspended particles; and a plan that details the timing and specific measures that would be taken to avoid and minimize those impacts.
- The potential for facility expansion, such as dredge and fill activities, additional right-of-way, deepening and widening of channels, additional storage tanks or other infrastructure and additional impacts to fish and wildlife habitat.
- On-site stormwater management plan.
- Potential environmental impacts resulting from damages to the proposed project facilities by a major hurricane and A Hurricane Response Plan.

Recommendations

TPWD offers the following recommendations and information for the purpose of avoiding and minimizing impacts to fish and wildlife resources, coastal zone uses, and recreational activities within the vicinity of the proposed project.

General Recommendations

Upland Construction

Recommendation: TPWD recommends the judicious use and placement of sediment control fence to exclude wildlife from areas to be disturbed. In many cases, sediment control fence placement for the purposes of controlling erosion and protecting water quality can be modified minimally to also provide the benefit of excluding wildlife access to construction areas.

- The exclusion fence should be buried at least six inches and be at least 24 inches high.
- The exclusion fence should be maintained for the life of the project and only be removed after the project activities are completed and the disturbed sites have been revegetated or otherwise stabilized.
- Construction personnel should be encouraged to examine the inside of the exclusion area daily to determine if any wildlife species have been trapped inside the area of impact and provide safe egress opportunities prior to initiation of construction activities.
- Regarding pipeline installation and HDD entry pits, any open trenches or deep excavation areas should be covered overnight and/or inspected every morning to ensure no wildlife species have been trapped.
- For open trenches and excavated areas, escape ramps should be installed at an angle of less than 45 degrees (1:1) in excavated areas that will allow trapped wildlife to climb out on their own.
- If any state-listed species are trapped in trenches or excavated areas, they should be removed by personnel permitted by TPWD to handle state-listed species.

Recommendation: For soil stabilization and/or revegetation of disturbed areas within the proposed project area's onshore and upland inshore sections, TPWD recommends utilizing erosion and seed/mulch stabilization materials that avoid entanglement hazards to snakes and other wildlife species. Because the mesh found in many erosion control blankets or mats pose an entanglement hazard to wildlife, TPWD recommends the use of no-till drilling, hydromulching and/or hydroseeding due to a reduced risk to wildlife. If erosion control blankets or mats would be used, the product should contain no netting or contain loosely woven, natural fiber netting in which the mesh design allows the threads to move, therefore allowing expansion of the mesh openings. Plastic mesh matting should be avoided.

Impacts to Terrestrial Vegetation and Wildlife Habitat

The onshore and inshore components of the proposed project consists of a mixture of habitat types and vegetation communities mapped as agricultural land (row crops), coastal prairie, salty prairie, deep sand grassland, huisache woodland or shrubland, deep sand live oak shrubland, and deep sand live oak forest and woodland. In general, current and past vegetation clearing can be a significant threat to native plant communities in an area because disturbed areas are often revegetated with invasive, introduced species.

Recommendation: To the greatest extent practicable, TPWD recommends avoiding and/or minimizing clearing native woody vegetation and native herbaceous communities (e.g., native grasslands) to construct new access roads or to accommodate heavy equipment access to project sites. Wherever possible, TPWD recommends locating new access roads in previously disturbed areas, including previously cleared right-of-ways (ROWs), utility corridors, etc., or improving existing roads (e.g., private farm and ranch roads). Material and equipment staging areas should be located in previously disturbed upland areas that do not require vegetation clearing.

Volume II, Section 8.2.6.1.3 indicates that construction impacts to native uplands would be long-term (> 6 months to recover) but would be expected to return to pre-construction conditions within three growing seasons. A portion of the onshore pipeline crosses live oak shrubland, live oak forest-woodland habitat (e.g. between MP 19.6 and 20.8). The material provided in Volume I indicates that the proposed onshore and inshore pipeline infrastructure would use established pipeline and utility corridors and previously disturbed areas to the greatest extent practicable.

Recommendation: TPWD appreciates that established pipeline and utility corridors and previously disturbed areas would be used wherever possible. However, in order to preserve a special vegetation community unique to the Live Oak Peninsula, when installing the pipeline through live oak forest, woodland or shrubland habitat on the Live Oak Peninsula, TPWD recommends narrowing the construction corridor to a width of 100 feet. Impacts to the live oaks in this area, many of which are hundreds of years old, will not recover within three growing seasons, thus resulting in permanent impacts. Narrowing the construction corridor would assist in minimizing permanent impacts to this unique habitat.

Colonization by invasive species, particularly invasive grasses and weeds, should be actively prevented. Vegetation management should include removing invasive species early on while allowing the existing native plants to revegetate disturbed areas.

Recommendation: TPWD recommends referring to the Lady Bird Johnson Wildflower Center Native Plant Database (available online) for regionally adapted native species that would be appropriate for post-construction landscaping of disturbed areas. For herbaceous revegetation efforts, TPWD recommends the exclusive use of a mixture of native grasses and forbs. While some introduced grasses that may be presently growing in or adjacent to the project areas can provide suitable forage for livestock and some species of wildlife with proper management, introduced species typically develop into monotypic stands of vegetation that do not provide high quality grassland habitat able to support a diversity of wildlife species. TPWD recommends that

native grasses having the same desirable characteristics as introduced grasses commonly use in revegetation plans be incorporated into project planning and implemented following construction.

Impacts to Aquatic Habitats

Horizontal directional drilling (HDD) methods, such as those proposed by the applicant, are frequently used to avoid and minimize impacts to aquatic resources. Project plans suggest that HDD methods will primarily be used to avoid impacts associated with waterbody crossings

Recommendation: The Inadvertent Returns Contingency Plan should include site specific plans for addressing returns in shallow water habitats that are in and adjacent to submerged or emergent aquatic vegetation and tidal flats. Site specific plans should include preferred access routes and specific protocols and/or guidelines for developing containment and recovery strategies that aim to avoid and minimize secondary impacts from machinery, equipment, foot traffic, and drilling fluid. The plan should also provide protocols and contact information for reporting inadvertent returns to the appropriate state and federal resource agencies. In the event an inadvertent return occurs, an assessment of the impacts and required mitigation should be conducted in consultation with TPWD.

The applicant has not provided sufficient information concerning post-construction restoration of aquatic resources to demonstrate that the impacts will be less than permanent and that there will be no secondary effects from the project. TPWD has concern for the level of restoration success that can be achieved on recent and relict barrier island habitats, especially coastal dune swale complexes, mangrove marshes, and tidal flats.

Recommendation: Because tidal flats and coastal dune swales are difficult to replace, these habitats should be avoided to maximum extent practicable.

Lighting

Lighting would be required throughout the onshore, inshore, and offshore components of the project during construction, operation, and decommissioning of the deepwater port facility. In addition to navigational beacons, lighting would be used for safety and security around facilities. As proposed, the project would minimize terminal lighting to that required for safety and navigation and lights would be down-shielded and/or directed at the water.

Recommendation: Particularly for inshore and onshore facilities, TPWD recommends considering appropriate lighting technologies and best management practices (BMPs) described at the International Dark-Sky Association website.

Specifically, security lighting within any fenced compounds should be fully down-shielded and directed away from vegetation outside of fenced areas. Security lighting around on-ground facilities should also be motion- or heat-sensitive to eliminate constant nighttime illumination. For offshore lighting, lights should be shielded to eliminate both skyward and sea surface illumination (which can attract fishes and invertebrates).

State Regulations

Parks and Wildlife Code

Nongame Birds

State law prohibits any take or possession of nongame birds, including their eggs and nests. Laws and regulations pertaining to state-protection of nongame birds are contained in Chapter 64 of the Texas Parks and Wildlife (TPW) Code. This protection applies to most native bird species, including ground nesting species. Although not documented in the Texas Natural Diversity Database (TXNDD), many bird species which are not listed as *threatened* or *endangered* are protected by Chapter 64 of the TPW Code and are known to be year-round or seasonal residents or seasonal migrants through the proposed project area.

During the winter, south Texas is the southernmost limit for many migratory birds and it is the northernmost extreme in the breeding season (spring-summer) for other species. Additionally, the proposed project area is in the middle of the Central Migratory Flyway through which millions of birds pass during spring and fall migration. Available food, cover, and water sources provide important stopover habitats for Neo-tropical migrants.

Biologically, this area of south Texas is highly productive and provides a range of habitats including large tracts of undeveloped land, grasslands, prairies, woodlands, marsh, and aquatic habitats. The diversity of habitats is suitable to support a diversity of wildlife species. In particular, the range of habitats provides cover, feeding, nesting and loafing areas for many species of birds; grassland birds, Neo-tropical migrants, shorebirds, wading birds, and raptors.

Recommendation: The proposed project is located in a region with very diverse habitats that are within the range and suitable habitat for many rare species and migratory birds. TPWD recommends the Draft EIS thoroughly evaluate the proposed project's potential impacts to nongame birds.

Any vegetation clearing (or ground disturbance that would impact ground nesting birds) that would be required to construct the onshore, inshore or offshore infrastructure (terminal, pipelines, booster station, HDD entry/exit pits), improve existing access roads, or create new access roads should be

scheduled to occur outside of the March 15-September 15 migratory bird nesting season. Contractors should be made aware of the potential of encountering non-game migratory birds (either nesting or wintering) in the proposed project site and be instructed to avoid negatively impacting them.

If vegetation clearing or ground disturbance must be scheduled to occur during the nesting season, TPWD recommends the areas to be impacted should be surveyed for active nests by a qualified biologist. Nest surveys should be conducted no more than five days prior to the scheduled clearing to ensure recently constructed nests are identified. If active nests are observed during surveys, TPWD recommends a 150-foot buffer of vegetation/undisturbed area remain around the nest until the young have fledged or the nest is abandoned.

State-listed Species

State law prohibits the capture, trap, take or kill (incidental or otherwise) of state-listed species. Laws and regulations pertaining to state-listed endangered or threatened animals are contained in Chapters 67 and 68 of the TPW Code; laws pertaining to endangered or threatened plants are contained in Chapter 88 of the TPW Code. There are penalties, which may include fines and/or jail time in addition to payment of restitution values, associated with take of state-listed species. A copy of *TPWD Guidelines for Protection of State-Listed Species*, which includes a list of penalties for take of species, can be found on the TPWD website.

For purposes of relocation, surveys, monitoring, and research, terrestrial state-listed species may only be handled by persons permitted through the TPWD Wildlife Permits Program. For more information regarding Wildlife Permits, please contact the Wildlife Permits Office at (512) 389-4647. For the above-listed activities that involve aquatic species please contact the Region 4 Regional Response Coordinator at (361) 825-3246 for the appropriate authorization.

The potential occurrence of state-listed species in the project area is primarily dependent upon the availability of suitable habitat. Direct impacts to high quality or suitable habitat therefore are directly proportional to the magnitude and potential to directly impact state-listed species. State-listed reptiles that are typically slow moving or unable to move due to cool temperatures are especially susceptible to being directly impacted during vegetation clearing for roads, staging areas, easements, or machinery access corridors.

Please be aware that determining the actual presence of a species in a given area depends on many variables including daily and seasonal activity cycles, environmental activity cues, preferred habitat, transiency and population density (both wildlife and human). The absence of a species can be demonstrated only with great difficulty and then only with repeated negative observations, taking into account all the variable factors contributing to the lack of detectable presence.

The application documents prepared for proposed project specifically assessed potential state-listed species impacts for the inshore component of the project and generally assessed them for the onshore component of the project.

Recommendation: TPWD recommends reviewing the most current TPWD annotated county lists of rare species for Nueces, San Patricio and Aransas counties, as rare species could be present depending upon habitat availability. These lists are available online at the TPWD Wildlife Diversity website. Major revisions were made to these lists in April 2019.

Throughout Volume II, Section 8, data from the TXNDD was cited as the source for determining the potential for rare species to occur in in the project area. Volume II, Section 15.3.8.1 cites the lack of TXNDD occurrence data to support the conclusion of the project having no effect on 18 state-listed species. This is an incorrect application of TXNDD data.

Recommendation: Please note that the TXNDD is intended to assist users in avoiding harm to rare species or significant ecological features. Given the small proportion of public versus private land in Texas, the TXNDD does not include a representative inventory of rare resources in the state. Absence of information in an area does not imply that a species is absent from that area. Although it is based on the best data available to TPWD regarding rare species, the data from the TXNDD do not provide a definitive statement as to the presences, absence or condition of special species, natural communities, or other significant features within your project area. These data are not inclusive and **cannot be used as presence/absence data**. They represent species that could potentially be in your project area. This information cannot be substituted for on-the-ground surveys. The TXNDD data is updated continuously based on new, updated and undigitized records; therefore, TPWD recommends requesting the most recent TXNDD data on a regular basis.

Volume II, Section 8.2.2.8 states that review of the TXNDD resulted in occurrences of federally listed species but no state listed species were listed within two miles of the project area. However, Appendix O reports the TXNDD record of a state-listed Texas horned lizard along State Highway 361 on Harbor Island adjacent to the project area.

Recommendation: TPWD recommends the Draft EIS thoroughly evaluate the proposed project's potential impacts to state-listed species in all three project areas; onshore, inshore and offshore. Information provided in future environmental documents should be verified for accuracy and consistency with the most current list. Specific evaluations should be designed to predict project impacts upon natural resources.

Aquatic Resources

In addition to spills, releases, and inadvertent returns of products associated with the construction, operation, or decommissioning of the proposed project, other construction related activities, such as dewatering and maintenance, occurring in or near aquatic habitats (including the GOM and Redfish Bay) may negatively impact fish, shellfish, and other aquatic resources. As the state agency with the primary responsibility for protecting the state's fish and wildlife resources, Chapter 12 Subchapter D of the TPW Code and Chapter 7 Subchapter D of the Water Code authorizes TPWD to investigate fish kills and any type of pollution that may cause loss of fish or wildlife resources, estimate the monetary value of lost resources, and seek restitution or restoration from the party responsible for the fish kill or pollution. Chapter 69 of the Texas Administrative Code (TAC) requires TPWD to actively seek full restitution for and/or restoration of fish, wildlife, and habitat loss occurring as a result of human activities. The restitution value of lost resources can be significant (e.g., at least \$500 for each individual of a threatened species and \$1,000 for each individual of an endangered species). In addition, the TPW Code makes it a criminal offense to kill any fish or wildlife resources classified as threatened or endangered.

Recommendation: Because the project would require work in and in proximity to aquatic habitats, the project should be coordinated with TPWD's Region 4 Regional Response Coordinator (361-825-3246) for appropriate authorization(s) and technical guidance to ensure protection of aquatic wildlife.

Public Lands

The inshore pipeline route would utilize a 100-foot-wide construction corridor that runs parallel to and north of Highway 361, bisects Redfish Bay and the Redfish Bay State Scientific Area (RBSSA), and runs through the length of Lighthouse Lakes Park. Additional temporary work corridors would provide access to the pipeline corridor and to entry and exit points of horizontally directionally drilled (HDD) segments of the pipeline.

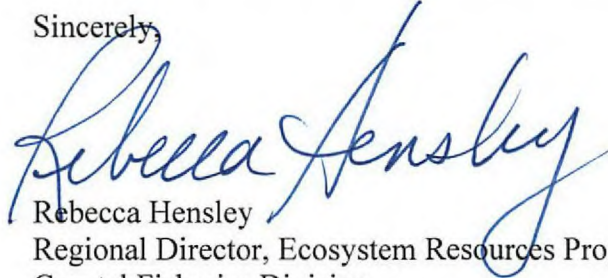
Lighthouse Lakes Park provides public access to the state designated Lighthouse Lakes Paddling Trail that was established by TPWD in 1999. The RBSSA was established by the Texas Parks and Wildlife Commission in 1999 for the purpose of education, scientific research, and preservation of flora and fauna of scientific or educational value. Because of this designation, the RBSSA has special status and the importance of seagrass habitat has since been specifically recognized by state law, not just within the RBSSA, but state-wide. As part of this special status, the policies of the Coastal Management Program as specified in Title 31, Texas Administrative Code section 501.29 require compliance with Chapter 26 of the TPW Code when development projects require the use or taking of any public land within a state park, wildlife management area or preserve, such as RBSSA.

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Chapter 26 of the TPW Code provides that a department, agency, political subdivision, county, or municipality of this state may not approve any project that requires the use or taking of public land (designated and used prior to the project as a park, public recreation area, scientific area, wildlife refuge, or historic site) unless it holds a public hearing and determines that there is “no feasible and prudent alternative to the use or taking of such land”, and the project “includes all reasonable planning to minimize harm to the land...resulting from the use or taking.”

TPWD appreciates the opportunity to comment and provide recommendations concerning the scope of the Draft EIS and for the avoidance and minimization of impacts to state fish and wildlife resources. Questions can be directed to Ms. Jackie Robinson (361-825-3241) or Ms. Leslie Koza (361-825-2329) in Corpus Christi.

Sincerely,

A handwritten signature in blue ink that reads "Rebecca Hensley". The signature is written in a cursive style with a large, prominent initial 'R'.

Rebecca Hensley
Regional Director, Ecosystem Resources Program
Coastal Fisheries Division

RH:LK:JR