

## Staff Summary for August 13-14, 2025

**23B. Marine Resources Committee (MRC)****Today's Item**Information ☐Action ☒

Receive summary and consider approving recommendations from the July 16-17, 2025 committee meeting, including the proposed MPA (marine protected area) petitions evaluation framework and potential grouping of petitioned actions for future review and evaluation discussion. Discuss referred topics and consider revisions to topics and timing.

**Summary of Previous/Future Actions**

- |   |                           |
|---|---------------------------|
| • Previous MRC meeting                      | July 16-17, 2025; MRC     |
| • <b>Today consider MRC recommendations</b> | <b>August 13-14, 2025</b> |
| • Next MRC meeting                          | November 6, 2025; MRC     |

**Background**

MRC works under Commission direction to set and accomplish its work plan (Exhibit 1). Today, the Commission will receive a report on the previous MRC meeting and recommendations, as well as provide direction for any referred topics and revisions to MRC topics and timing.

***Previous Committee Meeting***

MRC met on July 16 and 17 in Sacramento. Official meeting minutes (video) are posted on the [Commission's YouTube page](https://www.fgc.ca.gov/YouTube) with a link also available on the Commission's website meeting page ([fgc.ca.gov/Meetings/2025](https://fgc.ca.gov/Meetings/2025)); an abbreviated summary is included in this document.

***Commercial Coonstripe Shrimp Fishery***

The Department presented proposed management measures for the coonstripe shrimp fishery, which are proposed for inclusion in a regular rulemaking scheduled to begin in October. The measures, which include voluntary use of pop-up gear, were developed with input from stakeholders and fishermen, building upon emergency regulations adopted by the Commission in February 2025. MRC supported the Department-proposed long-term strategy for the fishery.

***California Halibut Fishery Management Review***

The Department provided updates for discussion on two topics:

- **Fishery Management.** Priorities and actions include completing a stock assessment for the southern California halibut stock and testing electronic monitoring and reporting for set gillnet fisheries.
- **Bycatch Evaluation in the Trawl Fishery.** The Department shared its progress on the trawl fishery bycatch evaluation, including outcomes from recent public workshops related to data sources and defining which key bycatch species will be evaluated. MRC supported further public engagement and a potential external review of the evaluation's outcomes.

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*Red Abalone Statewide Restoration Plan*

The Department updated MRC on the restoration plan's development, engagement structure, and key plan elements. After initial work in 2023 and 2024, the plan was paused in January 2025 due to funding challenges and staffing reductions. Next steps include a data evaluation, exploring partnerships and citizen science for data collection, and identifying funding opportunities. Both former recreational and commercial abalone fishers expressed a desire to assist with data collection and, in some cases, to be allowed limited harvest while doing so. The MRC co-chairs, however, reiterated the Commission's focus on restoration, not harvest.

*Kelp Management*

The Department presented a comprehensive update on three topics:

- **Kelp Restoration and Management Plan (KRMP) Development.** The Department provided a timeline and progress from recent stakeholder and science team meetings.
- **Kelp Restoration Tracking.** The Department shared that bull and giant kelp forest coverage showed only limited improvement statewide through 2024, with further declines in Del Norte County. Updates were provided on several current research and restoration projects.
- **Bull Kelp Commercial Harvest Restrictions.** Due to a lackluster return of bull kelp to the north coast, the Department recommended extending the temporary commercial bull kelp harvest restrictions for three additional years beyond January 1, 2026. However, two kelp harvesters testified that the need to close Sonoma and Mendocino counties to small-scale hand harvest was not sufficiently demonstrated, citing a lack of evidence that it impacts kelp reestablishment. As a result, MRC supported including flexibility in the rulemaking to potentially allow limited take in the two counties. MRC requested that the Department contact the InterTribal Sinkyone Wilderness Council for input, as the council was the source of the original proposal to prohibit harvest.

*Evaluating Marine Protected Areas (MPA) Petitions*

- **Department-Proposed Evaluation Framework for Bin 2 Petitions.** Developed in partnership with California Ocean Protection Council (OPC) and Commission staff, the Department presented its draft framework for evaluating the 15 "bin 2" petitions and their individual proposed actions. The Department provided both a draft petition evaluation template and an annotated summary that cross-references its questions with the evaluation considerations supported by the Commission in August 2023. Through public input and discussion, MRC identified a few clarifying refinements and additions to the draft framework, and requested the Department incorporate them into the draft evaluation framework for Commission consideration at today's meeting. For today's meeting, the Department has provided the revised draft evaluation framework with MRC-requested additions incorporated, and an annotated summary (exhibits 2-5).
- **Petition Groupings for Future Discussions.** The Department presented initial draft groupings of bin 2 petitions to facilitate future discussions, including a draft list of "tribally-focused" petitions identified by applying the draft evaluation framework questions. Commission staff then provided detailed two- or three-day grouping suggestions that employ a bioregional structure. Staff recommended either grouping tribally-focused petitions separately or organizing them with their relevant bioregion and

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prioritizing them first for discussion. MRC supported a bioregional approach and requested that the Tribal Committee be consulted to help determine which petitions are tribally-focused and to provide input on the evaluation process. MRC also encouraged the Department to release bin 2 petition evaluations with ample time for review prior to discussion meetings, consistent with its early release of bin 1 petition evaluations.

Detailed presentations for each of the discussion topics are available in the [MRC meeting materials](#).

### *Staff and Agency Updates*

- OPC staff provided an update on the development of a California aquaculture action plan.
- The Department's aquaculture coordinator reported that the project on best management practices for state aquaculture leases has remained on hold since 2020. The project is currently not feasible to resume due to existing staff commitments for lease oversight. MRC reaffirmed its commitment to pursuing the project in the future and plans to use the upcoming California aquaculture action plan as a tool for planning. The Department's marine enforcement district reported on recent poaching cases.
- Commission staff provided updates on the Commission Coastal Fishing Communities policy implementation.

### *Future Meetings*

For the November MRC meeting agenda, MRC requested a Department update on the barred sand bass recreational data collection effort in 2025 and a staff update on the coastal fishing communities project, focusing on the ten recommendations for potential future Commission focus included in the original [Staff Synthesis Report on Coastal Fishing Communities Meetings, 2016-2018](#).

### **MRC Recommendations**

There are four MRC recommendations for Commission consideration today.

1. *Commercial Coonstripe Shrimp Fishery*. Support a regular rulemaking that incorporates the emergency regulation changes, proposed updates, and additional regulatory measures recommended by the Department, and consider including buoy size and trap destruction device requirements, for notice authorization in October. Support the Department's plan to explore longer-term considerations for reducing the risk of marine life entanglement.
2. *Bull Kelp Commercial Harvest Restrictions*. Support extending the regulation for commercial bull kelp harvest restrictions and correcting a typographical error, as recommended by the Department. Support inclusion of an option offering flexibility to allow limited take in Sonoma and Mendocino counties. Note that a bull kelp commercial harvest rulemaking is scheduled for today's meeting (Agenda Item 20) to request authorization for public notice of the rulemaking.

## Staff Summary for August 13-14, 2025

3. *Evaluating MPA Petitions*

- *Petition Evaluation Framework.* Adopt the Department’s draft MPA petition evaluation framework with the specific addition of the word “equitable” before “access” in question 14, two new questions that refer to the Commission’s JEDI and Coastal Fishing Communities policies, and introductory text on climate resilience goals for the MPA network.
- *Petition Groupings for Future Discussions.* Support a bioregional approach for reviewing and discussing petition proposed actions and evaluations. Request Tribal Committee guidance to determine which petitions are considered “tribally-focused” and whether those petitions should be grouped separately or prioritized within their bioregion for future discussions. Note that the Tribal Committee is scheduled to discuss this request on August 12, the day prior to this meeting.

4. *Future Meetings.* Schedule a November discussion of the staff recommendations from the [Staff Synthesis Report on Coastal Fishing Communities Meetings, 2016-2018](#) for potential future direction, request for the November meeting an update from the Department on recent barred sand bass recreational data collection efforts, and approve changes to the work plan as proposed by staff.

**Committee Work Plan**

The updated MRC work plan (Exhibit 1) outlines topics and timelines for Commission-referred items, including MRC-recommended changes.

**Significant Public Comments**

1. ***MPA petition evaluation framework.*** An environmental NGO offers input and requests specific changes to the draft framework. For question 7a, they caution against relying on historical decisions. For question 14, they suggest replacing “more” with “equitable” to better align with the goal of increasing equitable access for marginalized communities; they also recommend inserting “other *non-extractive*” before “recreational opportunities” in the clarifying parenthetical. For question 15, they urge that a petition’s impacts to consumptive activities also consider positive impacts, such as enhanced population stability and fishery spillover. They recommend a new question to explicitly assess whether a petition has the potential to build climate change resilience. (Exhibit 6)
2. ***MPA petition evaluation framework groupings.*** A kelp restoration organization agrees with the 16 proposed petition evaluation questions, while also proposing to add an “urgency” criterion. They express frustration with evaluation process delays, noting a four-month delay in the timeline thus far. They support grouping petitions into bioregions and ask commissioners and staff to travel to these bioregions so the community can engage directly. Further, they highlight the “existential biodiversity crisis” caused by disappearing kelp forests, citing 2024 data that shows only 4% of Monterey Bay kelp and 6.3% of Carmel Bay kelp remains, a crisis their MPA petition is designed to address. (Exhibit 7)

## Staff Summary for August 13-14, 2025

**Recommendation**

**Commission staff:** Approve MRC recommendations 1, 3, and 4 and the updated petition evaluation framework as presented in Exhibit 3. Consider recommendation 2, regarding bull kelp commercial harvest regulations, under Agenda Item 20 today. Approve changes to the work plan as reflected in Exhibit 1.

**Exhibits**

1. [MRC work plan, updated July 31, 2025](#)
2. [Department memo, received July 28, 2025](#)
3. [Memo attachment 1: Draft evaluation framework for 2023 MPA bin 2 petitions, updated July 24, 2025 based on MRC feedback](#)
4. [Memo attachment 2: Draft evaluation framework, updated July 28, 2025 with edits based on MRC feedback, displayed in track changes](#)
5. [Memo attachment 3: Department summary of MPA regulation change petition framework discussion from August 2023, revised July 24, 2025 to cross-reference with draft evaluation framework questions related to each component](#)
6. [Letter from Sandy Aylesworth, Director of Pacific Initiative, Natural Resources Defense Council, received July 31, 2025](#)
7. [Email from Keith Rootsart, Founder, Giant Kelp Restoration, received July 31, 2025](#)

**Motion**

Moved by \_\_\_\_\_ and seconded by \_\_\_\_\_ that the Commission approves recommendations 1, 3, and 4 from the July 2025 MRC meeting, approves the petition evaluation framework as presented in Exhibit 3, and approves the changes to the work plan as discussed today.

# California Fish and Game Commission Marine Resources Committee (MRC) Work Plan

*Updated July 31, 2025*

*Note: Proposed changes to topics/timing are shown in blue underscore or ~~strike-out~~ font.*

Topics	Category	Mar 2025	Jul 2025	Nov 2025
<b>Planning Documents, Fishery Management Plans (FMP)</b>				
MLMA Master Plan for Fisheries – Implementation Updates	Plan Implementation			
Red Abalone <u>Recovery Restoration</u> Plan (statewide)	<u>Recovery Restoration</u> Plan		X	X
- Risk Tolerance for Reopening Fishery Harvest	<u>Recovery Restoration</u>	X/R		
California Halibut Fishery Management Review (CA Halibut Review) – CA Halibut Trawl Grounds Review	Management Review			
CA Halibut Review – Bycatch Evaluation for Trawl Gear	Management Review		X	*
Kelp Restoration and Management Plan (KRMP) Development	Restoration/ Management Plan		X	*
Marine Protected Area (MPA) Network 2022 Decadal Management Review Implementation: <i>MPA Petitions</i>	Management Review	*	X/R	X/R
<b>Regulations</b>				
Recreational Red Abalone Fishery Closure Sunset Date	Recreational Take	X/R		
Commercial Coonstripe Shrimp Fishery Management	Commercial Take	X	X/R	
Commercial Bull Kelp Harvest Sunset Date	Commercial Take	X	X/R	
<b>Marine Aquaculture and State Water Bottom Leases</b>				
Statewide Aquaculture Action Plan	Planning Document		*	<u>*</u>
Status of Existing Leaseholder Requests	Current Leases	X		
Applications for New Leases	Lease Applications		*	
- San Andreas Shellfish Company (Tomaes Bay)				
- Santa Barbara Sea Ranch (Santa Barbara County coast)		X		
Lease Best Management Practices Plans (Hold, TBD)	Leases–Regulatory		*	
<b>Special Projects, Informational Topics, and Emerging Management Issues</b>				
Coastal Fishing Communities Project	MRC Project	*	*	X
Kelp Restoration and Recovery Tracking	Kelp		X	
<b>Experimental Fishing Permit (EFP) Program</b>				
Box Crab Exploratory Fishing	EFP			
Pop-Up Gear in State-Managed Fisheries	EFP			

Key: X = Discussion    X/R = Recommendation and may move to Commission    \* = Written or oral agency update

# Memorandum

**Date:** July 28, 2025

Received 7/28/25  
Original signed copy on file

**To:** Melissa Miller-Henson  
Executive Director  
Fish and Game Commission

**From:** Craig Shuman, D. Env.  
Marine Regional Manager

**Subject:** **Agenda Item 23 B, Revised Draft 2023 MPA Bin 2 Petition Evaluation Framework.**

At its February 14-15, 2024 meeting, the California Fish and Game Commission (CFGF) referred 20 Marine Protected Area (MPA) petitions to California Department of Fish and Wildlife (CDFW) for review, evaluation, and recommendation. Throughout 2024, CDFW developed and implemented a [3-phased approach](#) to evaluate MPA petitions which was supported by the Marine Resources Committee (MRC) and approved by CFGF. The MRC considered CDFW's recommendations on 5 petitions (Bin 1) at the November 6-7, 2024 MRC meeting and CFGF adopted [the recommendations](#) at the December 11-12, 2025 CFGF meeting. At the March 13, 2025 MRC meeting, CDFW presented the proposed timeline and process for the remaining 15 petitions (Bin 2). This included developing an evaluation framework for the Bin 2 petitions and sorting the petitions into groups to facilitate subsequent petition discussions. CFGF approved the proposed timeline and process at their April 16-17, 2025 meeting.

CDFW, with support from staff at CFGF and the Ocean Protection Council, developed the draft 2023 MPA Bin 2 Petition Evaluation Framework (Draft Framework) for the MRC's consideration at the July 16-17, 2025 meeting. The Draft Framework is based on the adaptive management process outlined in chapter 4 of the [2016 Master Plan for MPAs](#) and draws from the [Decadal Management Review](#) results and [recommendations](#), and the MPA Regulation Change Petition Framework approved by CFGF at their August 2023 meeting. At the July 16-17, 2025 MRC meeting, the MRC requested CDFW make the following updates to the Draft Framework:

- Provide clarification in the introduction regarding how CDFW will incorporate climate change resilience throughout the evaluation of each proposed change when appropriate;
- Add "equitable" before "access" to Question 14; and
- Add two questions related to CFGF's [Justice, Equity, Diversity and Inclusion](#) and [Coastal Fishing Communities Policies \(new questions 16 and 17\)](#).

CDFW prepared a [clean copy of the revised Draft Framework](#) (Attachment 1) (and [a version that captures the edits in track changes](#) (Attachment 2)) for consideration by the CFGF at their August 13-14, 2025 meeting. The [annotated 2023 MPA Regulation Change Petition Framework](#) (Attachment 3) has also been updated to reflect the changes.

If you have any questions or need more information, please contact me at [r7regionalmgr@wildlife.ca.gov](mailto:r7regionalmgr@wildlife.ca.gov).

Attachment 1: Clean Copy of the revised Draft 2023 MPA Bin 2 Petition Evaluation Framework

Attachment 2: Revised Draft 2023 MPA Bin 2 Petition Evaluation Framework with edits to 6/26/25 version captured in track changes

Attachment 3: Updated Annotated August 2023 CFGF approved MPA Regulation Change Petition Framework

Melissa Miller-Henson, Executive Director

July 28, 2025

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ec: Jenn Eckerle, Deputy Secretary for Ocean and Coastal Policy  
Natural Resources Agency

Claire Waggoner, Environmental Program Manager  
Marine Region

Erica Mason, Senior Environmental Scientist, Supervisor  
Marine Region



**Updated July 24, 2025 based on Marine Resources Committee feedback received at their July 16-17, 2025 meeting.**

Attachment 1

**DRAFT Evaluation Framework for 2023 Marine Protected Area Bin 2 Petitions**

The following draft evaluation framework (Draft Framework) was developed for the 15 [Bin 2 Petitions](#) that propose changes to the Marine Protected Area (MPA) Network that were received by the California Fish and Game Commission (CFGF) and referred to the California Department of Fish and Wildlife (CDFW) in 2023. CDFW developed the Draft Framework, with support from staff at the CFGF and Ocean Protection Council (OPC), based on the adaptive management process outlined in chapter 4 of the [2016 Master Plan for MPAs](#). The 2016 Master Plan directs CDFW and CFGF to use the Marine Life Protection Act (MLPA) goals and mandates, MPA objectives, and design considerations as the primary basis for any action taken to make changes to the MPA Network. The 2016 Master Plan adaptive management process also includes consideration of emerging issues, such as changes to the MPA Network that would enhance climate resilience and/or help mitigate climate impacts. CDFW will consider climate change effects throughout the evaluation, recognizing that the effects of climate change are overarching and climate resilience is an implicit goal of adaptive management of the MPA Network as a whole. The Draft Framework also draws from the [Decadal Management Review \(DMR\)](#) and [recommendations](#), and the [MPA Regulation Change Petition Framework](#) approved by CFGF at their August 2023 meeting, which is rooted in the DMR recommendation cornerstones of MPA Governance, MPA Management Program Activities, and MPA Network Performance.

The Draft Framework includes the following sections:

- I. Petition Summary
- II. CDFW Draft Recommendations with Brief Justifications
- III. Bin 2 Petition Grouping: Identify Tribally-focused Petitions
- IV. CDFW 2023 MPA Bin 2 Petition Narrative and Evaluation
- V. Supplemental Analyses, Data and Information, and Citations
- VI. Summary of Other Considerations

CDFW proposes to use the Draft Framework to present the information used to evaluate petitions and develop recommendations to CFGF for the 2023 MPA Bin 2 petitions. The Bin 2 petitions and petition actions vary in complexity and the Draft Framework is designed to address this spectrum of complexity. In some cases, it will be more appropriate to evaluate whole Bin 2 petitions and in other cases, it will be more appropriate to evaluate the individual proposed actions within a petition. Not all evaluation components in Section IV will apply to every proposed action or petition. CDFW will apply the evaluation components as appropriate, and the level of detail when

evaluating each component may vary based on factors such as applicability or information available.

**I. Petition Summary**

<b>CFGC Tracking Number</b>	
<b>Petition Contact/Affiliation</b>	
<b>Number of Proposed Actions</b>	
<b>Affected MPAs</b>	
<b>Petition Summary</b>	
<b>Link to StoryMap page</b>	
<b>Petitioner's stated rationale and brief justification for proposed actions</b>	

## II. CDFW Draft Recommendations and Brief Justification

*Note: If a change to the MPA regulations is not needed to address the proposed change, CDFW will not evaluate the proposed change using the framework. However, CDFW may recommend an alternative pathway to achieving the desired outcome of the proposed change.*

Petition Action ID	Petition Proposed Action	Petitioner's stated rationale and brief justification for proposed actions	CDFW Draft Recommendation	Brief Justification

### III. Bin 2 Petition Grouping: Identify Tribally-focused Petitions

The purpose of this section is to identify if the petition explicitly aims to advance tribal co-management and stewardship of the MPA Network, if it is submitted by a tribe, or includes proposed actions explicitly related to tribes (e.g., tribal exemption, tribal take only MPA). CDFW will use this stage to sort the petitions into “Tribally-focused Petitions” and “Other Petitions.” A “yes” to one or more of the questions below will result in the petition being sorted into the Tribally-focused petitions. CDFW will meet with those identified petitioners and recommend the Tribal Committee discuss the Tribally-focused Petitions. At any point in the process tribes may request consultation with CDFW. All Bin 2 petitions, including Tribally-focused Petitions, may be evaluated with the CDFW 2023 MPA Bin 2 Petition Evaluation Framework in Section IV.

Tribal Components Questions	Answer and Explanation
Was the petition submitted by a tribe, tribal representative, or have a tribal co-sponsor?	
Does the proposed change explicitly aim to advance tribal co-management, subsistence harvesting, stewardship, and/or provide a tribal benefit through recognizing the cultural significance of an area?	
Is the proposed regulatory change explicitly linked to a tribe or tribes? (i.e. tribal exemption, tribal take only MPA, or new MPA for co-management)	

#### IV. CDFW 2023 MPA Bin 2 Petition Narrative and Evaluation

The Draft Framework is based on the [MPA Regulation Change Petition Framework](#) approved by the CFGC at their August 2023 meeting, which is rooted in the DMR recommendation cornerstones of MPA Governance, MPA Management Program Activities, and MPA Network Performance. CDFW has organized the evaluation questions to reflect the structure of the 2023 framework to ensure the petition evaluations align with considerations proposed by CFGC to help guide petition development and evaluation. Additionally, CDFW will identify information and governance gaps and other key considerations, such as competing regulations, effects on other agencies that have overlapping jurisdictions, and interactions between 2023 petitions, that will be critical for CFGC to consider in their decision-making.

Not all evaluation components will apply to every proposed petition action. CDFW will apply the evaluation components as appropriate, and the level of detail when evaluating each component may vary based on factors such as applicability or information available.

**Evaluation Narrative:** *[This section will include a summary narrative of the CDFW evaluation and recommendations.]*

Evaluation Question	2023_XMPA_1 <sup>1</sup> Answer and Explanation	2023_XMPA_2 Answer and Explanation	2023_XMPA_3 Answer and Explanation
<b>Question 1:</b> Does the proposed change support the MPA Network in meeting one or more of the MLPA Goals and align with MPA Master Plan adaptive management objectives?			
<b>Question 2a:</b> Does the proposed change advance adaptive management recommendations in the Decadal Management Review?  <b>Question 2b:</b> If not, does the proposed change address a current or emerging MPA management challenge?			
<b>Question 3:</b> Does the proposed change have the potential to affect existing CFGC non-MPA regulations, permits, or leases (e.g., kelp leases, aquaculture leases, Experimental Fishing Permits)?			
<b>Question 4:</b> Does the proposed change have the potential to affect existing regulations, permits, leases, or management activities of any other agency or entity?			
<b>Question 5:</b> Are there significant information gaps that need to be filled to inform the evaluation of the proposed change?			

<sup>1</sup> If it is more appropriate to evaluate the whole petition there will be one column for the answer and explanation. If it is more appropriate to evaluate the individual proposed actions within a petition, there will be a column for each action denoted as 2023\_XMPA\_1, where X is the petition number followed by the action number.

Evaluation Question	2023_XMPA_1 <sup>1</sup> Answer and Explanation	2023_XMPA_2 Answer and Explanation	2023_XMPA_3 Answer and Explanation
<b>Question 6:</b> Are there significant management gaps that need to be filled to inform the evaluation of the proposed change?			
<b>Question 7a:</b> Was the proposed change considered during the MLPA Planning Process or the implementation process of MPAs around the Northern Channel Islands?  <b>Question 7b:</b> If so, is there new information available, changing conditions since the implementation phase, and/or information presented in the DMR that warrants reevaluation of the proposed change?			
<b>Question 8:</b> If the proposed change affects an existing MPA, does the proposed change align with the original intent of the MPA identified during the MLPA Initiative planning process or the implementation of MPAs around the Northern Channel Islands?			
<b>Question 9:</b> Does the proposed change improve individual MPA or MPA Network design so that it better aligns with or meets the MPA science guidelines?			
<b>Question 10a:</b> Does the proposed change align with CDFW Feasibility Guidelines?  <b>Question 10b:</b> If not, is there a rationale for moving forward with the proposed change or an alternative that could meet the intent but better align with feasibility guidelines?			

Evaluation Question	2023_XMPA_1 <sup>1</sup> Answer and Explanation	2023_XMPA_2 Answer and Explanation	2023_XMPA_3 Answer and Explanation
<b>Question 11:</b> Does the proposed change maintain or improve enforceability of MPA regulations?			
<b>Question 12:</b> Does the proposed change simplify regulatory language or enhance public understanding without changing the intent of the MPA?			
<b>Question 13:</b> Does the proposed change maintain or enhance protection of marine resources?			
<b>Question 14:</b> Does the proposed change provide more equitable access opportunities (e.g., fishing, educational, and/or other recreational opportunities) for traditionally underserved or marginalized communities?			
<b>Question 15:</b> Does the proposed change have the potential to affect consumptive and/or non-consumptive activities? If so, how?			
<b>Question 16:</b> Is the proposed change consistent with the CFGC Justice, Equity, Diversity and Inclusion Policy?			
<b>Question 17:</b> Is the proposed change consistent with the CFGC Coastal Fishing Communities Policy?			
<b>Question 18:</b> Does the proposed change interact with or have the potential to affect proposed changes in other 2023 MPA petitions?			



**V. Supplemental Analyses, Data and Information, and Citations**

*This section will include any supplemental analyses, supporting data or information, and citations used to inform CDFW's recommendation.*

**VI. Summary of Other Considerations**

*This section will summarize other factors, if any, that the Commission should be aware of related to the petition.*

DRAFT

**Updated July 28, 2025 based on Marine Resources Committee feedback received at their July 16-17, 2025 meeting. Edits are reflected in blue, underlined text.**

## Attachment 2

### **DRAFT Evaluation Framework for 2023 Marine Protected Area Bin 2 Petitions**

The following draft evaluation framework (Draft Framework) was developed for the 15 [Bin 2 Petitions](#) that propose changes to the Marine Protected Area (MPA) Network that were received by the California Fish and Game Commission (CFGC) and referred to the California Department of Fish and Wildlife (CDFW) in 2023. CDFW developed the Draft Framework, with support from staff at the CFGC and Ocean Protection Council (OPC), based on the adaptive management process outlined in chapter 4 of the [2016 Master Plan for MPAs](#). The 2016 Master Plan directs CDFW and CFGC to use the Marine Life Protection Act (MLPA) goals and mandates, MPA objectives, and design considerations as the primary basis for any action taken to make changes to the MPA Network. [The 2016 Master Plan adaptive management process also includes consideration of emerging issues, such as changes to the MPA Network that would enhance climate resilience and/or help mitigate climate impacts. CDFW will consider climate change effects throughout the evaluation, recognizing that the effects of climate change are overarching and climate resilience is an implicit goal of adaptive management of the MPA Network as a whole.](#) The Draft Framework also draws from the [Decadal Management Review \(DMR\)](#) and [recommendations](#), and the [MPA Regulation Change Petition Framework](#) approved by CFGC at their August 2023 meeting, which is rooted in the DMR recommendation cornerstones of MPA Governance, MPA Management Program Activities, and MPA Network Performance.

The Draft Framework includes the following sections:

- I. Petition Summary
- II. CDFW Draft Recommendations with Brief Justifications
- III. Bin 2 Petition Grouping: Identify Tribally-focused Petitions
- IV. CDFW 2023 MPA Bin 2 Petition Narrative and Evaluation
- V. Supplemental Analyses, Data and Information, and Citations
- VI. Summary of Other Considerations

CDFW proposes to use the Draft Framework to present the information used to evaluate petitions and develop recommendations to CFGC for the 2023 MPA Bin 2 petitions. The Bin 2 petitions and petition actions vary in complexity and the Draft Framework is designed to address this spectrum of complexity. In some cases, it will be more appropriate to evaluate whole Bin 2 petitions and in other cases, it will be more appropriate to evaluate the individual proposed actions within a petition. Not all evaluation components in Section IV will apply to every proposed action or petition. CDFW will apply the evaluation components as appropriate, and the level of detail when evaluating each component may vary based on factors such as applicability or information available.

I. Petition Summary

<b>CFGC Tracking Number</b>	
<b>Petition Contact/Affiliation</b>	
<b>Number of Proposed Actions</b>	
<b>Affected MPAs</b>	
<b>Petition Summary</b>	
<b>Link to StoryMap page</b>	
<b>Petitioner's stated rationale and brief justification for proposed actions</b>	

## II. CDFW Draft Recommendations and Brief Justification

*Note: If a change to the MPA regulations is not needed to address the proposed change, CDFW will not evaluate the proposed change using the framework. However, CDFW may recommend an alternative pathway to achieving the desired outcome of the proposed change.*

Petition Action ID	Petition Proposed Action	Petitioner's stated rationale and brief justification for proposed actions	CDFW Draft Recommendation	Brief Justification

### III. Bin 2 Petition Grouping: Identify Tribally-focused Petitions

The purpose of this section is to identify if the petition explicitly aims to advance tribal co-management and stewardship of the MPA Network, if it is submitted by a tribe, or includes proposed actions explicitly related to tribes (e.g., tribal exemption, tribal take only MPA). CDFW will use this stage to sort the petitions into “Tribally-focused Petitions” and “Other Petitions.” A “yes” to one or more of the questions below will result in the petition being sorted into the Tribally-focused petitions. CDFW will meet with those identified petitioners and recommend the Tribal Committee discuss the Tribally-focused Petitions. At any point in the process tribes may request consultation with CDFW. All Bin 2 petitions, including Tribally-focused Petitions, may be evaluated with the CDFW 2023 MPA Bin 2 Petition Evaluation Framework in Section IV.

Tribal Components Questions	Answer and Explanation
Was the petition submitted by a tribe, tribal representative, or have a tribal co-sponsor?	
Does the proposed change explicitly aim to advance tribal co-management, subsistence harvesting, stewardship, and/or provide a tribal benefit through recognizing the cultural significance of an area?	
Is the proposed regulatory change explicitly linked to a tribe or tribes? (i.e. tribal exemption, tribal take only MPA, or new MPA for co-management)	

#### IV. CDFW 2023 MPA Bin 2 Petition Narrative and Evaluation

The Draft Framework is based on the [MPA Regulation Change Petition Framework](#) approved by the CFGC at their August 2023 meeting, which is rooted in the DMR recommendation cornerstones of MPA Governance, MPA Management Program Activities, and MPA Network Performance. CDFW has organized the evaluation questions to reflect the structure of the 2023 framework to ensure the petition evaluations align with considerations proposed by CFGC to help guide petition development and evaluation. Additionally, CDFW will identify information and governance gaps and other key considerations, such as competing regulations, effects on other agencies that have overlapping jurisdictions, and interactions between 2023 petitions, that will be critical for CFGC to consider in their decision-making.

Not all evaluation components will apply to every proposed petition action. CDFW will apply the evaluation components as appropriate, and the level of detail when evaluating each component may vary based on factors such as applicability or information available.

**Evaluation Narrative:** *[This section will include a summary narrative of the CDFW evaluation and recommendations.]*

Evaluation Question	2023_XMPA_1 <sup>1</sup> Answer and Explanation	2023_XMPA_2 Answer and Explanation	2023_XMPA_3 Answer and Explanation
<b>Question 1:</b> Does the proposed change support the MPA Network in meeting one or more of the MLPA Goals and align with MPA Master Plan adaptive management objectives?			
<b>Question 2a:</b> Does the proposed change advance adaptive management recommendations in the Decadal Management Review?  <b>Question 2b:</b> If not, does the proposed change address a current or emerging MPA management challenge?			
<b>Question 3:</b> Does the proposed change have the potential to affect existing CFGC non-MPA regulations, permits, or leases (e.g., kelp leases, aquaculture leases, Experimental Fishing Permits)?			
<b>Question 4:</b> Does the proposed change have the potential to affect existing regulations, permits, leases, or management activities of any other agency or entity?			
<b>Question 5:</b> Are there significant information gaps that need to be filled to inform the evaluation of the proposed change?			

<sup>1</sup> If it is more appropriate to evaluate the whole petition there will be one column for the answer and explanation. If it is more appropriate to evaluate the individual proposed actions within a petition, there will be a column for each action denoted as 2023\_XMPA\_1, where X is the petition number followed by the action number.

Evaluation Question	2023_XMPA_1 <sup>1</sup> Answer and Explanation	2023_XMPA_2 Answer and Explanation	2023_XMPA_3 Answer and Explanation
<b>Question 6:</b> Are there significant management gaps that need to be filled to inform the evaluation of the proposed change?			
<b>Question 7a:</b> Was the proposed change considered during the MLPA Planning Process or the implementation <a href="#">process</a> of MPAs around the Northern Channel Islands?  <b>Question 7b:</b> If so, is there new information available, changing conditions since the implementation phase, and/or information presented in the DMR that warrants reevaluation of the proposed change?			
<b>Question 8:</b> If the proposed change affects an existing MPA, does the proposed change align with the original intent of the MPA identified during the MLPA Initiative planning process or the implementation of MPAs around the Northern Channel Islands?			
<b>Question 9:</b> Does the proposed change improve individual MPA or MPA Network design so that it better aligns with or meets the MPA science guidelines?			
<b>Question 10a:</b> Does the proposed change align with CDFW Feasibility Guidelines?  <b>Question 10b:</b> If not, is there a rationale for moving forward with the proposed change or an alternative that could meet the intent but better align with feasibility guidelines?			



Evaluation Question	2023_XMPA_1 <sup>1</sup> Answer and Explanation	2023_XMPA_2 Answer and Explanation	2023_XMPA_3 Answer and Explanation
<b>Question 11:</b> Does the proposed change maintain or improve enforceability of MPA regulations?			
<b>Question 12:</b> Does the proposed change simplify regulatory language or enhance public understanding without changing the intent of the MPA?			
<b>Question 13:</b> Does the proposed change maintain or enhance protection of marine resources?			
<b>Question 14:</b> Does the proposed change provide more <a href="#">equitable</a> access opportunities ( <a href="#">i.e.g.</a> , fishing, educational, and/or other recreational opportunities) for traditionally underserved or marginalized communities?			
<b>Question 15:</b> Does the proposed change have the potential to affect consumptive and/or non-consumptive activities? If so, how?			
<b>Question 16:</b> <a href="#">Is the proposed change consistent with the CFGC Justice, Equity, Diversity and Inclusion Policy?</a>			
<b>Question 17:</b> <a href="#">Is the proposed change consistent with the CFGC Coastal Fishing Communities Policy?</a>			
<b>Question 186:</b> Does the proposed change interact with or have the potential to affect proposed changes in other 2023 MPA petitions?			

**V. Supplemental Analyses, Data and Information, and Citations**

*This section will include any supplemental analyses, supporting data or information, and citations used to inform CDFW's recommendation.*

**VI. Summary of Other Considerations**

*This section will summarize other factors, if any, that the Commission should be aware of related to the petition.*

DRAFT

### Attachment 3

#### Department of Fish and Wildlife: Summary of Marine Protected Area (MPA) Regulation Change Petition Framework Discussion

(07/27/23) Revised 08/10/23; Revised 8/17/23; Revised 6/26/25; Revised 7/24/25 (new text is *italicized*).

CDFW has annotated this document to reflect which questions in the [DRAFT Evaluation Framework \(Draft Framework\)](#) for 2023 MPA Bin 2 petitions relate to each component of the MPA Regulation Change Petition Framework approved by CFGC in 2023 outlined here. Related question numbers that appear in the Draft Framework are listed in bold font.

At the California Fish and Game Commission's (CFGC) July 20, 2023 Marine Resources Committee (MRC) meeting, MRC, CFGC staff, California Department of Fish and Wildlife (CDFW) staff, and stakeholders discussed potential next steps in pursuing the MPA Decadal Management Review (DMR) report recommendations and goals. The discussion included a potential framework to assist in evaluation of petitions the CFGC may receive related to changes to the MPA network and management program. At the request of MRC, staff from CDFW summarized the input received at the July 20, 2023 MRC meeting regarding these MPA petition framework considerations.

Broadly, petitions submitted to the CFGC are evaluated on a case by case by basis. To help guide petition development and subsequent review by CDFW, the MRC received the following input for evaluating petitions related to MPAs:

- Compatible with the goals and guidelines of the Marine Life Protection Act (MLPA) (**Draft Framework Question 1**)
- Help advance one or more of the [six goals](#) of the MLPA; (**Draft Framework Question 1**)
- Garner strong community support; and/or (**Public input will be considered throughout the petition evaluation process**)
- Advance adaptive management recommendations under the cornerstones of MPA governance, MPA Management Program activities, and MPA Network Performance outlined in [DMR Table 6.1](#) to ensure that petitions meet MPA management priorities (**Draft Framework Question 2**)

The MRC also received input organized by cornerstone as follows:

- MPA Governance:
  - Simplifies regulatory language or enhances public understanding (**Draft Framework Questions 11 and 12**)
  - Addresses inaccuracies or discrepancies in regulations (**Draft Framework Questions 11 and 12**)
  - Accounts for regional stakeholder group intent identified during the regional MLPA planning process (including MPA-specific goals/objectives and design considerations) (**Draft Framework**

### **Questions 7 and 8)**

- Accounts for CDFW's [MPA design and management feasibility guidelines](#) **(Draft Framework Question 10)**
- Advances tribal stewardship and co-management, consistent with the CFGC [Co-Management Vision Statement and Definition](#) **(Section III of the Draft Framework)**
- Improves access for traditionally underserved or marginalized communities, consistent with the [CFGC Policy on Justice Equity, Diversity and Inclusion](#) **(Draft Framework Questions 14 and 16)**
- Acknowledges socio-economic implications, such as access for consumptive or non-consumptive users **(Draft Framework Question 15)**
- MPA Management Program Activities:
  - Clearly addresses or identifies scientific need for MPA Network based on best available science and scientific advancement since Network completion **(Draft Framework Question 9)**
  - Improves compliance and/or enforceability **(Draft Framework Questions 11 and 12)**
- MPA Network Performance:
  - Maintains or enhances the protections and integrity of the MPA Network **(Draft Framework Question 13)**
  - Maintains or enhances habitat and species connectivity **(Draft Framework Question 9)**
  - Adheres to science guidelines, such as maintaining minimum size and spacing, and protection of diverse habitats **(Draft Framework Question 9)**
  - Enhances climate resilience and/or helps mitigate climate impacts **(See *opening evaluation preamble*)**

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**From:** Aylesworth, Sandy <saylesworth@nrdc.org>

**Sent:** Thursday, July 31, 2025 04:48 PM

**To:** FGC <FGC@fgc.ca.gov>

**Subject:** Agenda Item 23B

Good afternoon,

Kindly find attached a comment letter for Agenda Item 23B on the MPA petition draft evaluation framework. NRDC submitted a similar letter for the MRC meeting and wanted to share it with the full commission as we believe our comments remain relevant.

Thank you, and kindly let me know if you have any problems with the attachment.

Best,

Sandy

July 31, 2025

California Fish and Game Commission  
Marine Resources Committee  
P.O. Box 944209 Sacramento, CA 94244-2090

Submitted electronically to [fgc@fgc.ca.gov](mailto:fgc@fgc.ca.gov)

**RE: Agenda Item 23B - Draft Evaluation Framework for 2023 Marine Protected Area Bin 2 Petitions**

Dear President Zavaleta and Honorable Commissioners:

NRDC appreciated the robust discussion at the July 17 Marine Resources Committee (MRC) meeting on the California Department of Fish & Wildlife's (Department) draft evaluation framework for Bin 2 MPA petitions. We thank Department staff for their considerable efforts to create an objective and transparent process for evaluating the Bin 2 petitions. While we are generally supportive of the MRC's proposed changes to the draft evaluation framework, we would like to register our full suite of comments on the draft framework, as they are still relevant. We provide feedback and recommendations below.

**Question 7a:** We caution against emphasizing historical decisions to guide the evaluation of Bin 2 petitions.<sup>1</sup> The passage of the MLPA twenty-five years ago was an act of great prescience and ambition. However, adaptive management of the MPA network should not only look at the past and current performance of the network – it also must consider and address future challenges. We recommend adding a question that explicitly asks CDFW to assess whether the petition has the potential to build resilience to the impacts of climate change. Although NRDC conceptually supports the addition of preamble language regarding climate change resilience, there should be a concrete mechanism to explicitly consider current and future ocean conditions when evaluating a petition.

The adaptive management process is occurring in the context of unprecedented changes to California's ocean. Ocean waters are rising, becoming warmer, more acidic, lower in oxygen, and prone to extreme events.<sup>2</sup> Combined with the impacts of existing local stressors (e.g., fishing, pollution), climate change poses a significant threat to California's ocean biodiversity and coastal economy. At the same time, human pressures to use the ocean more intensively are rising.<sup>3</sup> California is investing heavily in offshore wind energy production as a key

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<sup>1</sup> See Questions 7 and 8 of the CDFW draft evaluation framework.

<sup>2</sup> H.-O. Pörtner et al., "IPCC Special Report on the Ocean and Cryosphere in a Changing Climate," Intergovernmental Panel on Climate Change, 2019, [https://www.ipcc.ch/site/assets/uploads/sites/3/2019/12/SROCC\\_FullReport\\_FINAL.pdf](https://www.ipcc.ch/site/assets/uploads/sites/3/2019/12/SROCC_FullReport_FINAL.pdf).

<sup>3</sup> Benjamin Halpern, et al., "Spatial and temporal changes in cumulative human impacts on the world's ocean." *Nature communications* 6, no. 1 (2015): 1-7 6. 7615. 10.1038/ncomms8615.

component of its clean energy transition;<sup>4</sup> demand for the expansion of aquaculture is rising;<sup>5</sup> pressure to develop desalination plants along the coast will only increase as the severity of the freshwater crisis in California intensifies; and efforts to develop ocean-based carbon dioxide removal (CDR) strategies are advancing.

MPAs can guard marine ecosystems from ocean crowding and help them face rapidly changing ocean conditions in numerous ways: by reducing cumulative impacts from local stressors; by helping to protect species, genetic, and phenotypic diversity; by creating refuges in areas that are climatically stable through time; and by creating functional networks to help maintain migration and dispersal corridors.<sup>6</sup> In addition, relying on historical decisions could inadvertently discount voices that were conspicuously absent from the original decision-making process, as well as the voices of current and future Californians.<sup>7</sup>

With this in mind, we are pleased to see **Question 7b**<sup>8</sup> included in the draft evaluation framework, as mere consideration of an area during the MLPA process over ten years ago should not be seen as grounds for prejudice against a petition proposing protections for that area now. However, in its evaluation of whether “changing conditions since implementation phase” have occurred for an area under consideration, it is critical that the Department consider large-scale changes in ocean conditions and increasing human pressures across state waters as well as local changes. California’s MPA network was established as a single, ecologically connected unit<sup>9</sup> – changing conditions should therefore be assessed at the network scale, not examined solely through a narrow local lens.

**Question 14:** NRDC also strongly supports state-led efforts to make ocean experiences welcoming for marginalized, disadvantaged, and Tribal communities, who have long been displaced, removed, or excluded from California’s coast. We appreciate that Question 14 specifically evaluates access opportunities for traditionally underserved and historically marginalized communities.<sup>10</sup> However, simply assessing access without a lens toward equity risks further marginalizing underrepresented groups. To more clearly align the evaluation

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<sup>4</sup> California Energy Commission. (2022). Offshore Wind Energy Development off the California Coast

<sup>5</sup> Rosamond Naylor et al., “A 20-year retrospective review of global aquaculture.” *Nature* 591, no. 7851 (2021): 551-563. <https://www.nature.com/articles/s41586-021-03308-6>.

<sup>6</sup> Marissa L. Baskett and Lewis A. K. Barnett. “The ecological and evolutionary consequences of marine reserves,” *Annual Review of Ecology, Evolution, and Systematics* 6 (2015): 49-73, <https://doi.org/10.1146/annurev-ecolsys-112414-054424>; Callum M. Roberts et al., “Marine Reserves Can Mitigate and Promote Adaptation to Climate Change,” *PNAS* 114, no. 24 (2017): 6167-75, <https://doi.org/10.1073/pnas.1701262114>.

<sup>7</sup> Curtis G. Burkey and Scott W. Williams. “California Indian Tribes and the Marine Life Protection Act: The Seeds of a Partnership to Preserve Natural Resources.” *American Indian Law Review*. (2019) <https://digitalcommons.law.ou.edu/cgi/viewcontent.cgi?article=1701&context=airl>.

<sup>8</sup> Page 7, “If so, is there new information available, changing conditions since the implementation phase, and/or information presented in the DMR that warrants reevaluation of a proposed change?”

<sup>9</sup> FGC § 2853 (a)

<sup>10</sup> Page 8, “Does the proposed change provide more access opportunities (i.e. fishing, educational, and/or other recreational opportunities) for traditionally underserved or marginalized communities?”

framework with the desired social outcome of equity and support the state's goal of increased equitable access, we suggest replacing the word "more" with "equitable" in this question.

Additionally, explicitly articulating a broad definition of "access" would accurately reflect the diversity of values with which Californians interact with their ocean. We recommend inserting the words "other non-extractive" before "recreational opportunities" in the clarifying parenthetical.

**Question 15:** Finally, we appreciate that Question 15 considers impacts to non-consumptive as well as consumptive activities.<sup>11</sup> At least half of all Californians visit the coast each year, and the vast majority undertake non-consumptive activities like bird watching, tidepooling, beach walking, swimming, boating, and surfing.<sup>12</sup> California's MPAs provide an important tool to invest in the future health of our coastal ecosystems and offer direct benefits to communities, including enhanced recreation and the potential for improved subsistence-level and commercial fishing outside of MPA boundaries. We urge the Commission and CDFW to ensure that evaluations of a petition's impacts to consumptive activities also consider potential positive impacts, such as the potential for enhanced population stability and spillover of fishery-targeted species into nearby fishing grounds.

We thank you for the opportunity to provide input on the state's evaluation framework for the consideration of changes to the network and encourage the continuation of a transparent public process. To that end, we would appreciate the opportunity for petitioners to respond to CDFW's recommendations on Bin 2 petitions before the CFGC weighs in with their decisions.

Thank you for your leadership, and we look forward to working alongside the state to advance ocean conservation in California's waters.

Sincerely,

Sandy Aylesworth  
Director, Pacific Initiative  
Natural Resources Defense Council

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<sup>11</sup> Page 8, "Does the proposed change have the potential to affect consumptive and/or non-consumptive activities? If so, how?"

<sup>12</sup> Charles Colgan, Philip King, and Sarah Jenkins, Coastal Recreation in California: Beyond the Beach, Center for the Blue Economy: Middlebury Institute of International Studies at Monterey, November 2021, <https://cbe.miiis.edu/publications/1/>



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**From:** Keith Rootsaert <keith@g2kr.com>  
**Sent:** Thursday, July 31, 2025 04:20 PM  
**To:** FGC <FGC@fgc.ca.gov>  
**Cc:** Ashcraft, Susan@FGC <Susan.Ashcraft@fgc.ca.gov>  
**Subject:** FGC Meeting by G2KR Agenda Item 23B

FGC Staff,

Please find our attached comments for the August 14 FGC meeting.

Thank you,

Keith Rootsaert  
Giant Giant Kelp Restoration  
408-206-0721



**Giant Giant Kelp**  
Restoration Project

Fish and Game Commission  
August 13-14, 2025 Meeting  
Agenda Item 23B - MRC

Dear Commissioners and staff,

We are in agreement with the 16 DMR petition evaluation criteria questions discussed at the Marine Resources Committee. We reiterated previous comments; urgency should be a criterion for petition evaluation. We have enveloped our urgent requests to restore kelp into a single petition that continues to be delayed. We are in favor of grouping petitions into bioregions and ask commissioners and staff to travel to the bioregions to engage the community and understand the context of our petition.

In 2024 we were under the impression that once amendments to 2023 petitions were submitted, petition evaluations could begin, so we submitted our amendment in January, only to learn that the Department was waiting for other amendments to be submitted. Then we discovered that evaluation questions were to be workshopped by CDFW & OPC.

Although CDFW Director Charles Bonham recommended that the FGC conclude the DMR petition process in 2025, at the MRC we were told that the April 2026 MRC meeting would be the first decision point because the Department evaluators needed until March 2026 to complete their evaluation. The goal posts were moved back 4 months. This process behaves like a parabolic equation where the line approaches zero but never actually touches it.

Our frustration with the lack of action only increases as we watch in dismay as our kelp forests disappear along with hundreds of species that live and depend on this three-dimensional refuge habitat and primary productivity in the food web. Remote sensing is highly variable, but the 2024 Landsat3 data shows 4% of kelp remaining in Monterey Bay and 6.3% of kelp remaining in Carmel Bay. This is an existential biodiversity crisis that affects the apex predator, the endangered southern sea otter, the hardest.

Although our petition is for a comprehensive kelp restoration permit program, we have adapted to the circumstance of government not reacting by using the regulations afforded us before the crisis to do our work. Government non-responsiveness is an opportunity to work at our own pace. We set the schedule and perform tasks and realize objectives in whatever order we like with collaborators that we choose. How the Kelp Restoration Management Plan would like to permit kelp restoration in 2027 may be overcome by the 2025 practice of the regenerative urchin fishery and the possible 2026 acceptance of 2023-23MPA\_AM1.

We first began kelp restoration in Monterey May 18, 2018. The longer we are working in the kelp restoration space the more we realize how many connected issues are affected by the loss of kelp that also must be addressed. Subjects like salmon, squid, rockfish, remote sensing, water quality, bull kelp, marine heatwaves, culling policy, grants, naming MPAs, abalone, tribal communities take, regenerative fishing, federal defunding, mariculture, sea otters, invasive species, and red sea urchin fishing, are all tangentially related yet very important.

There is a common understanding in the policy space that people are experts in only one thing and speaking off-topic is perceived as untruthful or biased. I have certainly been guilty of reaching into other fields that are not my area of expertise or practice as I try to help fix everything we need to fix while waiting around. This distraction has served to dilute my effectiveness at kelp restoration advocacy at FGC meetings. I endeavor to stay focused on kelp restoration until we gain approval when hopefully I will be too busy to come to FGC meetings and speak on so many tangential subjects.

Please understand the urgency and inevitability of kelp restoration and our continued frustration with the 2023 DMR petition approval process.

Thank you for all you do!

Keith Rootsart

Giant Kelp Restoration Project



**Giant Kelp**  
Restoration Project