

California Department of Fish and Wildlife's
Evaluation of 2023 Decadal Management Review Marine
Protected Area Petition:
**Reclassify Point Buchon SMCA to an SMR and Limit Allowable
Uses at Farnsworth Onshore and Offshore SMCAs to Recreational
Spearfishing (2023-34MPA)**



I. PETITION SUMMARY

CFGC Tracking Number	2023-34MPA
Petition Contact/Affiliation	Laura Deehan, Environmental California Research and Policy Center and Azul
Number of Proposed Actions	3
Affected MPAs	Point Buchon State Marine Conservation Area (SMCA), Farnsworth Onshore SMCA, Farnsworth Offshore SMCA
Petition Summary	Reclassify Point Buchon SMCA as a State Marine Reserve (SMR) and modify allowed uses at Farnsworth Onshore and Offshore SMCAs.
Link to StoryMap page	2023-34MPA



II. CDFW DRAFT RECOMMENDATIONS AND BRIEF JUSTIFICATION

Note: If a change to the Marine Protected Area (MPA) regulations is not needed to address the proposed change, California Department of Fish and Wildlife (CDFW) did 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 and Proposed Action	Petitioner’s Stated Rationale and Brief Justification for Proposed Actions	CDFW Draft Recommendation and Brief Justification
<p>2023-34MPA_1 Reclassify Point Buchon SMCA to SMR to prohibit take.</p>	<p>The petitioner’s stated intent for the proposed change is that compliance with Point Buchon SMCA/SMR regulations is very low and the current level of protection does not provide sufficient benefits. Change of classification will increase compliance and level of protection.</p>	<p>Deny. The proposed reclassification of Point Buchon SMCA as an SMR would not improve MPA design or function within the Network and would create unnecessary socioeconomic impacts. Scientific review shows that additional No-take protections would not increase habitat representation, ecological function, or connectivity beyond what the existing SMR/SMCA cluster already provides. Compliance concerns raised in the proposal are not supported by enforcement data, which indicate generally low citation levels and improving trends. Maintaining recreational and commercial salmon and albacore fishing aligns with the original design intent of the SMCA and balances conservation with community needs.</p>

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<p align="center">Petition Action ID and Proposed Action</p>	<p align="center">Petitioner’s Stated Rationale and Brief Justification for Proposed Actions</p>	<p align="center">CDFW Draft Recommendation and Brief Justification</p>
<p>2023-34MPA_2 Change regulations to allow only recreational spearfishing within Farnsworth Onshore SMCA boundaries.</p>	<p>The petitioner’s stated intent for the proposed change is that allowed take in the SMCA creates confusion and causes violations, and the current level of protection does not provide sufficient benefits. Change of regulations will increase compliance and level of protection.</p>	<p>Deny. Available information does not demonstrate that the proposed change to further restrict allowed gear types in the affected MPA would produce measurable ecological benefits to benthic species or the Network beyond current conditions. Concerns raised regarding illegal fishing are primarily related to enforcement challenges rather than regulatory confusion and are better addressed through non-regulatory measures. Longterm MPA monitoring data do not indicate declines in key protected resources, such as California hydrocoral. Implementing the proposed change would be inconsistent with the original intent of the MPAs, unlikely to advance MLPA Goals, and would unnecessarily impact recreational and commercial fisheries.</p>
<p>2023-34MPA_3 Change regulations to allow only recreational spearfishing within Farnsworth Offshore SMCA boundaries.</p>	<p>See 2023-34MPA_2.</p>	<p>Deny. See 2023-34MPA_2.</p>

III. BIN 2 PETITION GROUPING: IDENTIFY TRIBALLY-LED PETITIONS

The 2023 MPA Petition Companion Document (Attachment 1) includes a summary of the process for identifying Tribally-led petitions, CDFW’s outreach to all California Native American tribes¹ (tribes) throughout the petitions process, and a summary of outreach and engagement with Tribally-led petitioners. Tribally-led petitions were evaluated with the CDFW 2023 MPA Bin 2 Petition Evaluation Framework.

Tribal Components Questions	Answer and Explanation
<p>Was the petition submitted by a California Native American tribe, representative designated by a tribe or tribal organization, or have a tribal co-sponsor? If yes,</p> <ul style="list-style-type: none"> a. 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? b. 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). 	<p>No, this petition was not submitted by a tribe or representative designated by a tribe and does not have a tribal co-sponsor.</p>

¹ California Native American tribe is the preferred term to use per the Governor’s Office of Tribal Affairs when generally mentioning tribes of California, both federally and non-federally recognized.

IV. PETITION EVALUATION

EVALUATION NARRATIVE AND OVERVIEW FOR 2023-34MPA_1

The petitioner has requested to reclassify Point Buchon SMCA to an SMR. The proposed change aims to address the petitioner's desire to "improve conservation outcomes for California SMCAs with compliance issues and low levels of protection." The petition cites California Department of Fish and Wildlife (CDFW) law enforcement updates and outcomes from a series of compliance forums as identifying Point Buchon as a potential hotspot of low compliance (MPACN 2020a). The petitioner asserts that the perceived compliance issues could reduce the ecological benefits this MPA would otherwise provide to the Network.

The petitioner proposes merging the existing offshore Point Buchon SMCA with the adjacent onshore Point Buchon SMR to create a single, No-take MPA. The current SMCA regulations permit recreational and commercial fishing for salmon (*Oncorhynchus* spp.) and albacore (*Thunnus alalunga*). The petitioner states redesignation to an SMR would "increase the level of protection and help to improve enforceability" due to perceived low compliance and the headlands of Point Buchon allegedly obscuring the southeast corner from view, facilitating poaching (MPACN 2020a). They also cite anticipated impacts from "growing threats related to climate change, increased human use, new ocean uses, and infrastructure projects such as offshore wind and aquaculture" as reasons for "stronger protections."

The petitioner asserts the proposed action aligns with one or more goals of the Marine Life Protection Act (MLPA). However, CDFW's evaluation finds the proposed change:

- Is inconsistent with the goal of the MPA, as defined during the MLPA Initiative planning process,
- Does not align with the original intent of the MPA,
- Would not provide measurable benefits to the MPA Network beyond what is currently offered, and
- Would unnecessarily impact recreational and commercial fishing.

Since the onset of digital citation tracking in 2016, citations within Point Buchon SMCA were fewer than 10 citations per year until 2022, where MED issued 19 citations (Table 1), which MED attributed to reductions in rockfish bag limits implemented through emergency action for that year (CFGC 2022). While No-take MPAs are generally easier to enforce than partial take MPAs, Point Buchon SMCA balances the goals of the MLPA to provide recreational opportunities while affording a High Level of Protection (LOP). To improve compliance, MED increased enforcement, as well as education and outreach in partnership with the MPA Collaborative Network (MPACN), Ocean Protection Council, California Marine Sanctuary Foundation, Cal Poly San Luis Obispo, and others at Point

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Buchon SMCA. Following these efforts, citations decreased to 14 citations in 2023 and none during 2024 or 2025. In addition to outreach and education, a Community Compliance Forum cited by the petitioner also recommended enhanced monitoring tools like M2 radar systems (MPACN 2020a), which CDFW supports. Reclassifying the SMCA to an SMR was not a recommended solution during these forums and is unlikely to benefit compliance more effectively than continued enforcement and outreach and education.

Point Buchon SMCA currently supports important near-port fishing opportunities for salmon and albacore when individuals of these species are present and fishing regulations allow. Prohibiting these fisheries would disproportionately affect local fishers who rely on a limited number of offshore access points along this portion of the coast without added ecological benefit. During the Central Coast MLPA Initiative planning process, inclusion of an SMCA portion within the Point Buchon cluster was intended to minimize socioeconomic impacts by allowing recreational and commercial fishing for albacore and salmon. Due to the selectivity of the fishing gear for these species, this MPA's design also met the Science Advisory Team (SAT) criteria for a High LOP. Together with the onshore SMR, the current SMCA is a backbone MPA (i.e., habitat replicate), facilitating ecological connectivity within the Network. This design aligns with MLPA Goals by balancing ecological protection with socioeconomic considerations.

Although reclassifying Point Buchon SMCA to an SMR would increase its LOP from High to Very High, this change is not expected to enhance the design of the MPA Network, as the MPA is already serving its ecological connectivity role, and is likely to provide minimal enhanced protection to salmon and albacore. Both species are migratory and their presence in the area varies on different temporal scales (e.g., seasonally, decadal), depending on a variety of atmospheric and oceanographic factors. Given the temporary presence of these species within the MPA and that compliance with MPA regulations has improved since 2022, CDFW anticipates the proposed change would have minimal ecological benefit beyond what is currently offered.

While offshore wind development areas are in the planning phase near Point Buchon, there is currently insufficient information to support the assertion that converting this partial-take MPA to a No-take MPA would increase ecological resilience or mitigate potential impacts from future infrastructure. Similarly, CDFW acknowledges the petitioner's concerns regarding other future stressors (e.g., climate change, human use, aquaculture) on California's coastal ecosystems; however, it is unlikely that prohibiting recreational and commercial fishing of salmon and albacore in Point Buchon SMCA would be more effective at increasing the MPA's resilience to these stressors than continuing education, outreach, and enforcement to ensure compliance.

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In summary, the information reviewed by CDFW indicates that compliance at Point Buchon SMCA has improved since 2022 and that the proposal to convert the SMCA to an SMR is inconsistent with the original intent of the MPA, is unlikely to measurably enhance protection beyond what is currently offered, and thus, would unnecessarily impact recreational and commercial fishing opportunities for salmon and albacore. More appropriate adaptive management measures for this MPA include continuing education, outreach, enforcement, and supporting enhanced monitoring tools like M2 radar systems.

RECOMMENDATION FOR 2023-34MPA_1

Given these considerations, and the information in the evaluation questions below, **CDFW recommends California Fish and Game Commission (CFGCC) DENY 2023-34MPA_1** proposed change to redesignate Point Buchon SMCA to an SMR.

EVALUATION NARRATIVE AND OVERVIEW FOR 2023-34MPA_2 & 2023-34MPA_3

The petitioner has requested to modify take regulations for Farnsworth Onshore and Offshore SMCAs. The proposed changes aim to address the petitioner's overall stated problem to "improve conservation outcomes for California SMCAs with compliance issues and low levels of protection." The petition cites CDFW law enforcement updates and outcomes from a series of compliance forums as identifying these two MPAs as potential hotspots of low compliance (MPACN 2020b). The petitioner asserts that the perceived compliance issues could cause potential negative effects on the ecological benefits these MPAs would otherwise provide to the Network.

The proposal requests to reduce the take allowance at Farnsworth Onshore and Farnsworth Offshore SMCAs to only allow recreational spearfishing. The petitioner states the two MPAs "are currently 'minimally protected'... due to the substantial number of gear types allowed and species targeted." The petitioner further states that the regulatory language of the two MPAs "is almost impossible to detect, leading to confusion about what is and isn't permitted." The petition also cites MPACN reports of alleged illegal activity by commercial passenger fishing vessels targeting groundfish at Farnsworth Offshore SMCA (MPACN 2020b). The petitioner asserts that the proposed action to allow spearfishing only would increase compliance and protection and align with one or more Goals of the MLPA. They also stated a need to better protect a highly sensitive, rare, and valuable ecosystem, specifically benthic habitats that support California hydrocoral (*Stylaster californicus*) and black (*Haliotis cracherodii*) and white (*Haliotis sorenseni*) abalone. However, given the evaluation presented below, CDFW finds the proposed change:

- Is inconsistent with the MLPA Initiative-established MPA Goals, which are still relevant today,
- Does not align with the original intent of the MPAs,

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- Is unlikely to provide measurable benefits to the benthic habitat or the MPA Network beyond what is currently offered, and
- Would unnecessarily impact recreational and commercial fishing.

Farnsworth Onshore and Offshore SMCAs are part of a cluster of MPAs located on the windward side of Santa Catalina Island off southern California. The primary distinction in regulations between the two Farnsworth SMCAs is the take of pelagic finfish², where the Offshore SMCA allows recreational take of pelagic finfish by hook-and-line or spearfishing, and the Onshore SMCA allows recreational take of pelagic finfish by spearfishing only. All other recreational and commercial regulations are identical in both MPAs and include recreational take of market squid by hand-held dip net; white seabass by spearfishing; and marlin, tuna and dorado by trolling. The Farnsworth SMCAs also allow commercial take of coastal pelagic species³ by round-haul net, brail gear, and light boat; and swordfish by harpoon.

The petitioner's claims that the affected SMCAs are currently minimally protected are based on levels of protection defined in Grorud-Colvert et al.'s (2021) MPA Guide framework. The MPA Guide was developed to provide general guidance on MPA design and a consistent approach for categorizing and comparing MPAs at a global scale. However, the more appropriate resource for determining the LOP of California's MPAs is the MLPA Initiative regional LOPs assigned by the SAT. When designing California's MPA Network, scientists in each planning region specifically assigned each MPA an LOP that reflects region-specific fisheries, gear types, and species-habitat interactions, which were then extensively vetted through the regional stakeholder process.

During the MLPA Initiative Planning Process, the key purpose identified for the Farnsworth Onshore and Offshore SMCAs was to protect the unique pinnacles, habitats, and species on and around Farnsworth Bank (MLPA 2009a). The Blue Ribbon Task Force chose an MPA design that provided a High LOP while minimizing socioeconomic impacts to the commercial squid and swordfish harpoon fisheries. This was achieved by only allowing pelagic fishing and gear types, which had been assigned a High LOP by the SAT. Thus, regulations at both Farnsworth SMCAs were specifically designed to prohibit bottom-contact fishing gear to protect benthic habitats. Having met size and spacing SAT

² Albacore, bluefin, bigeye, and yellowfin tuna (*Thunnus* spp.); skipjack tuna (*Katsuwonus pelamis*); dorado (dolphinfish) (*Coryphaena hippurus*); striped marlin (*Kajikia audax*); thresher sharks (common, pelagic, and bigeye) (*Alopias* spp.); shortfin mako shark (*Isurus oxyrinchus*); blue shark (*Prionace glauca*); and Pacific swordfish (*Xiphias gladius*)

³ northern anchovy (*Engraulis mordax*), Pacific sardine (*Sardinops sagax*), Pacific mackerel (*Scomber japonicus*), jack mackerel (*Trachurus symmetricus*), and market squid (*Doryteuthis opalescens*)

guidelines (in addition to a High LOP), these MPAs were also designed as habitat replicates to facilitate ecological connectivity within the MPA Network.

The two MPAs replaced and expanded upon a previous, smaller protected area named Farnsworth Bank SMCA, which was established in 1972 by CFGC to prevent the collection and harvest of California hydrocoral. Farnsworth Bank, a high spot in the benthic topography within the SMCA, was also designated an Area of Special Biological Significance by the State Water Resources Control Board on March 21, 1974 and is widely visited by commercial diving vessels due to its pinnacles and hydrocoral densities. During the planning process, concerns about anchor damage to hydrocoral led the Blue Ribbon Task Force to recommend that CDFW evaluate and, if feasible, install a mooring system and prohibit anchoring (MLPA 2009a); however, no mooring system has been implemented, and anchoring remains allowed.

CDFW shares the petitioner's concerns regarding alleged illegal take of groundfish, indicated by vessels within Farnsworth Offshore SMCA that relocate when MED patrol vessels approach. However, the issue appears related to enforcement logistics rather than regulatory clarity, as MED has confirmed that the site's location makes intercepting violators difficult. CDFW supports non-regulatory measures to address illegal fishing, including enhanced surveillance tools like M2 radar, expanded use of geolocation applications, targeted public outreach to reduce unintentional noncompliance, and ensuring sufficient resources for enforcement.

Anchoring by diving and fishing vessels may pose a greater risk to benthic resources than alleged illegal fishing. For example, a 1981 State Water Resources Control Board water quality monitoring report identified boat anchors and chains as the primary threat to California hydrocoral at Farnsworth Bank, with additional impacts associated with scuba divers, and recommended installation of a permanent mooring or establishment of an anchor drop zone (SWRCB 1981). Just before the Farnsworth SMCAs were established, Love et al. (2010) reported light monofilament line as the most observed form of debris during four research submersible surveys at Farnsworth Bank and nearby areas, followed by anchor gear and heavy line/cable (Love et al. 2010). At present, the extent to which anchoring or illegal fishing with bottom contact gear has affected hydrocoral within the Farnsworth SMCAs since implementation is uncertain. Long-term MPA monitoring using remotely operated vehicles (ROVs) shows substantial increases across bioregions in California hydrocoral (up to 455%) following the 2013–2014 marine heatwave (Wong et al. 2026). Although Farnsworth was excluded from that analysis due to baseline data limitations, surveys as of 2021 indicate hydrocoral densities at Farnsworth were comparable to or higher than other sites surveyed during the same period (Table 2). Continued monitoring is needed to better assess and distinguish among the effects of anchoring, fishing, and other drivers on sensitive habitats within

Farnsworth Bank SMCAs, including hydrocoral populations and other benthic species. Such data could also inform the need for, and spatial extent of, a future designated anchoring drop zone or permanent mooring array.

Socioeconomic impacts to the commercial squid fleet were a key consideration in the MLPA Initiative planning process (MLPA 2009a). In the northern Channel Islands alone, about 25% of regional squid catch from 1999 to early 2003 occurred in areas later closed due to the establishment of the MPA Network (CDFW 2024). The Farnsworth Onshore and Offshore SMCAs continue to be important fishing areas for the commercial squid fleet, particularly Farnsworth Onshore SMCA (Figure 1), as well as to the commercial swordfish harpoon fishery. Given the California market squid (*Doryteuthis opalescens*) fishery's high sustainability⁴ and the fact that these areas already function as core components of the MPA Network, further reductions to the fishing grounds and restricting take to spearfishing only would impose socioeconomic costs without clear ecological benefit. From an MPA Network design perspective, the Farnsworth SMCAs fulfill their intended role as partial-take MPAs with a High LOP, while nearby No-take MPAs (Blue Cavern Onshore No-take SMCA and Long Point SMR) provide Very High LOPs. Modifying MPA regulations at Farnsworth would therefore be unlikely to improve habitat protection, connectivity, or MPA Network performance beyond what is currently offered.

In summary, available information does not demonstrate that further restricting allowed gear types in the affected MPAs would produce measurable ecological benefits beyond current conditions. Concerns raised regarding illegal fishing are primarily related to education, outreach, and enforcement challenges rather than regulatory shortcomings and are better addressed through non-regulatory measures. Monitoring data does not indicate declines in key protected resources, such as California hydrocoral, that would justify additional fishing restrictions. Implementing the proposed change would be inconsistent with the original intent of the MPAs, unlikely to advance MLPA Goals, and would unnecessarily impact recreational and commercial fishing.

RECOMMENDATION FOR 2023-34MPA_2 & 2023-34_3

Given these considerations, and the information in the evaluation questions below, **CDFW recommends CFGC DENY** both petition actions:

- **2023-34MPA_2**, Change regulations to allow only recreational spearfishing within Farnsworth Onshore SMCA boundaries, and

⁴ <https://www.seafoodwatch.org/stories/california-market-squid>;
<https://fisheries.msc.org/en/fisheries/cwpa-california-market-squid-purse-seine/>;
<https://www.fisheries.noaa.gov/species/california-market-squid/seafood>

- **2023-34MPA_3**, Change regulations to allow only recreational spearfishing within Farnsworth Offshore SMCA boundaries

EVALUATION QUESTIONS

2023-34MPA_1: Reclassify Point Buchon SMCA to SMR to prohibit take

QUESTION 1: 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?

The MLPA Goals and Master Plan objectives are inextricably linked and act as the foundational tools that CDFW utilizes for effective adaptive management of the MPA Network. Individual MPAs in the Network were not necessarily designed to address all six Goals of the MLPA but instead were intended to act as an important component of a functioning Network that was designed to holistically address the MLPA Goals. As such, CDFW has evaluated this action within the broader adaptive management framework and how the proposed action may or may not align with the MLPA Goals/Master Plan objectives and advance MPA Network management. See Question 1 of Attachment 1 for the MLPA Goals and Master Plan objectives.

The petitioner asserts the proposed action aligns with MLPA Goals 1, 2, and 5 related to preserving natural diversity, sustaining marine life populations, and ensuring California's MPAs have clearly defined objectives, effective management measures and adequate enforcement and are based on sound scientific guidelines.

During the Central Coast MLPA Initiative planning process, Point Buchon SMCA was designed to protect and replicate hard and soft bottom habitat, protect benthic and forage species, protect larval sources, and minimize socio-economic impacts by allowing some recreational and commercial fishing (MLPA 2006b). This area is important to the formation of an ecologically sound MPA Network component, by linking these habitats to similar habitats in other parts of the region. This summary of objectives corresponds to Goals 2-6.

Thus, reclassification of Point Buchon SMCA to an SMR would offer no change in the design of the affected MPA in terms of Goals 2 and 5. Reclassifying Point Buchon SMCA as an SMR would meet MLPA Goal 1; however, given that compliance in this SMCA has improved since 2022 and that the presence of albacore and salmon is seasonal to decadal, the actual ecological benefit of a reclassification is anticipated to be minimal.

QUESTION 2A: DOES THE PROPOSED CHANGE ADVANCE ADAPTIVE MANAGEMENT RECOMMENDATIONS IN THE DECADAL MANAGEMENT REVIEW?

No. The petitioner asserts that the proposed change would:

"...advance DMR Recommendation 4.b.) 'Identify and utilize best science-based approaches to inform potential changes to the MPA Network in order to enhance Network performance.' Since the creation of the MPA network, a decade of scientific peer-reviewed research from around the world has shown that highly to fully protected areas provide the greatest benefits for biodiversity conservation, and that partially protected areas only hinder enforcement, public understanding, and conservation outcomes."

By design, Point Buchon SMCA already provides a High LOP, and together with the onshore SMR comprises part of the MPA Network backbone, facilitating ecological connectivity within the Network. Thus, the proposed change is unlikely to enhance MPA Network performance beyond what is currently provided and does not advance adaptive management recommendations in the DMR. See Question 5 for information reviewed by CDFW in this evaluation. See Question 2a of Attachment 1 for the Decadal Management Review and adaptive management Recommendations.

QUESTION 2B: IF NOT, DOES THE PROPOSED CHANGE ADDRESS A CURRENT OR EMERGING MPA MANAGEMENT CHALLENGE?

No. The proposed change does not address a current or emerging MPA management challenge.

QUESTION 3: 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)?

No. CDFW does not anticipate that CFGC would need to make conforming changes to other regulations, permits, or leases in response to the proposed change to these MPA regulations.

QUESTION 4: DOES THE PROPOSED CHANGE HAVE THE POTENTIAL TO AFFECT EXISTING REGULATIONS, PERMITS, LEASES, OR MANAGEMENT ACTIVITIES OF ANY OTHER AGENCY OR ENTITY?

No. The proposed change is not expected to affect existing regulations, permits, leases, or management activities of other agencies and entities.

QUESTION 5: ARE THERE SIGNIFICANT INFORMATION GAPS THAT NEED TO BE FILLED TO INFORM THE EVALUATION OF THE PROPOSED CHANGE?

No. CDFW has sufficient information to evaluate and make a recommendation on this proposal. When evaluating this petition, CDFW reviewed the information in the petition as well as information including but not limited to:

- Community Compliance Forum Reports (MPACN 2020a & 2020b),
- CDFW MED Data (Table 1), and
- MLPA Planning documents and related information (e.g., MLPA Goals and MPA Master Plan adaptive management objectives).

CDFW reviewed the available information and did not find that it supports the petitioner's assertions that "compliance with Point Buchon SMCA/SMR... regulations is very low." Furthermore, the information indicates that the proposed solution is inconsistent with the original intent of the MPA and unlikely to measurably enhance protection beyond what is currently offered, and thus, would unnecessarily impact recreational and commercial fishing opportunity.

QUESTION 6: ARE THERE SIGNIFICANT MANAGEMENT GAPS THAT NEED TO BE FILLED TO INFORM THE EVALUATION OF THE PROPOSED CHANGE?

No. CDFW has sufficient management information to proceed with the evaluation of this proposed change.

QUESTION 7A: WAS THE PROPOSED CHANGE CONSIDERED DURING THE MLPA INITIATIVE PLANNING PROCESS OR THE IMPLEMENTATION PROCESS OF MPAS AROUND THE NORTHERN CHANNEL ISLANDS?

No. All MPA arrays developed by the Regional Stakeholder Group during the Central Coast MLPA Initiative planning process included an offshore SMCA adjacent to an onshore SMR at Point Buchon. All three Regional Stakeholder Group proposals included recreational and commercial take of salmon, while two of the proposed arrays also included recreational and commercial take of albacore (MLPA 2006a). Species likely to benefit from this MPA included various invertebrates, groundfish, seabirds, and harbor porpoise (MLPA 2006b). The offshore Point Buchon SMCA was intended to work in concert with the adjacent onshore Point Buchon SMR. See Question 8 for more information on the original intent of this MPA.

QUESTION 7B: IS THERE NEW INFORMATION AVAILABLE, CHANGING CONDITIONS SINCE THE MLPA IMPLEMENTATION PHASE, AND/OR INFORMATION PRESENTED IN THE DMR THAT WARRANTS REEVALUATION OF THE PROPOSED CHANGE?

No. There is no information that has emerged since implementation of the MPA Network to support the proposed change.

QUESTION 8: 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 PROCESS OF MPAS AROUND THE NORTHERN CHANNEL ISLANDS?

No. Redesignating Point Buchon SMCA to an SMR by removing recreational and commercial take of salmon and albacore does not align with original intent of the MPA. During the Central Coast MLPA Initiative planning process, one stated intent was to “provide additional protection for benthic species and typical forage species (squid and pelagic finfish) while allowing fishing for salmon and albacore” (Goal 2). Another Goal (Goal 5) was to minimize the socio-economic impacts by positioning the SMR on the north side of Diablo Security Closure and to allow fishing in the offshore SMCA. The SMCA was designed to work together with the onshore SMR as an MPA cluster, with the overall intention of balancing ecological protection and connectivity with social and economic considerations. The SMCA currently provides one of the few close-to-port offshore fishing opportunities for anglers along this portion of the coast targeting salmon and albacore.

QUESTION 9: DOES THE PROPOSED CHANGE IMPROVE INDIVIDUAL MPA OR MPA NETWORK DESIGN SO THAT IT BETTER ALIGNS WITH OR MEETS THE MPA SCIENCE GUIDELINES?

No. The MLPA requires that the design of individual MPAs and the statewide Network be based on the best readily available science and that MPAs be of adequate size, number, protection level, and location to meet MLPA Goals. The science guidelines developed by the SAT and outlined in the Master Plan provide this scientific foundation and serve as the starting point for evaluating alternative MPA proposals. Alignment with these guidelines depends on the LOP, which is determined by allowed take, and spatial configuration. More specifically, these guidelines require that an MPA must be at least 9 square miles and meet one of the three highest LOPs (i.e., Very High, High, or Moderate-high) to contribute to ecological goals such as habitat replication and representation.

Point Buchon SMCA, together with neighboring Point Buchon SMR, currently meets both minimum criteria (area and LOP), and thus already contributes to foundational ecological Network objectives. The proposed change would increase the SMCA’s LOP from High to Very High. However, since Point Buchon SMCA already meets both minimum criteria, this increase in protection is unlikely to measurably enhance protection beyond

the existing contribution to the Network. Therefore, implementation of the proposed change would not improve the design of the MPA Network. See Question 9 of Attachment 1 for the MPA Science Guidelines and additional context.

QUESTION 10A: DOES THE PROPOSED CHANGE ALIGN WITH CDFW FEASIBILITY GUIDELINES?

Yes. The proposed action to reclassify Point Buchon SMCA to an SMR to prohibit take aligns with CDFW Feasibility Guidelines. The change would result in one large SMR at Point Buchon within the existing boundaries of the SMCA/SMR complex. This single MPA configuration aligns with guidance in which distance offshore should “extend from the shoreline to the three-mile state water boundary.” Additionally, the north and south boundaries are already on readily determinable latitude lines. See Question 10a of Attachment 1 for the CDFW Feasibility Guidelines.

QUESTION 10B: 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?

Not applicable.

QUESTION 11: DOES THE PROPOSED CHANGE MAINTAIN OR IMPROVE ENFORCEABILITY OF MPA REGULATIONS?

Yes. Reducing take allowances and allowed activities in this MPA could improve enforceability. In general, No-take MPAs are easier to enforce than partial take MPAs. However, although MED confirmed a period of low compliance in 2022, this was following an emergency action reducing rockfish bag limits (CFGC 2021). Compliance issues are not uncommon after regulatory changes are enacted and they typically taper off after increased outreach and enforcement. Historically, citations within Point Buchon SMCA were fewer than 10 per year prior to 2022, when 19 citations were issued. Citations have since declined, with 14 in 2023 and no citations issued in 2024 or 2025 (Table 1). MED attributes the improved compliance to additional outreach and education efforts as well as enforcement presence. Recommended solutions from Community Compliance Forums cited by the petitioner include continued education, outreach, and support for enhanced monitoring tools like M2 radar systems. Continuing outreach and education efforts and enforcement presence may be as or more effective than the proposed regulatory change.

QUESTION 12: DOES THE PROPOSED CHANGE SIMPLIFY REGULATORY LANGUAGE OR ENHANCE PUBLIC UNDERSTANDING WITHOUT CHANGING THE INTENT OF THE MPA?

No. Although converting the SMCA to an SMR would further simplify the regulatory language, the proposed action would change the intent of the MPA.

QUESTION 13: DOES THE PROPOSED CHANGE MAINTAIN OR ENHANCE PROTECTION OF MARINE RESOURCES?

Yes. Redesignating Point Buchon SMCA to an SMR would maintain the existing protections within the MPA and could enhance protection for individuals of ocean salmon and albacore, for which recreational and commercial take is currently allowed. However, both species are migratory and their presence in the area varies on different temporal scales (e.g., seasonally, decadal), depending on a variety of atmospheric and oceanographic factors. Thus, the actual benefit the proposed change may have on these species is anticipated to be minimal. In addition, there may be benefits to other non-target species that may be incidentally taken and discarded during fishing for salmon and albacore.

QUESTION 14: DOES THE PROPOSED CHANGE PROVIDE MORE EQUITABLE ACCESS OPPORTUNITIES (E.G., FISHING, EDUCATIONAL, AND/OR OTHER RECREATIONAL OPPORTUNITIES) FOR TRADITIONALLY UNDERSERVED OR MARGINALIZED COMMUNITIES?

See Question 14 of Attachment 1.

QUESTION 15: DOES THE PROPOSED CHANGE HAVE THE POTENTIAL TO AFFECT CONSUMPTIVE AND/OR NON-CONSUMPTIVE ACTIVITIES? IF SO, HOW?

Yes. The proposed action would decrease consumptive activities through eliminating commercial and recreational take of salmon and albacore in this MPA.

This is one of the few areas in the region that is close to port where there are opportunities for offshore salmon and albacore fishing when they are in the area and when state and federal fishing regulations allow. Both albacore and salmon are migratory and their presence in the area varies on different temporal scales (e.g., seasonally, decadal), depending on a variety of atmospheric and oceanographic factors, which can also impact their availability.

Non-consumptive activities would likely not be affected.

QUESTION 16: IS THE PROPOSED CHANGE CONSISTENT WITH THE CFGC JUSTICE, EQUITY, DIVERSITY AND INCLUSION POLICY?

See Question 16 of Attachment 1.

QUESTION 17: IS THE PROPOSED CHANGE CONSISTENT WITH THE CFGC COASTAL FISHING COMMUNITIES POLICY?

The following analysis was prepared by CFGC staff. See Question 17 of Attachment 1 for additional context on CFGC's response. The proposed change would reduce fishing access, particularly for commercial and recreational salmon and albacore fishery participants homeported in the coastal fishing communities of:

- Avila (Port San Luis, ~7 nautical miles (nm) away from area of proposed change), and
- Morro Bay (~7 nm away from area of proposed change).

QUESTION 18: DOES THE PROPOSED CHANGE INTERACT WITH OR HAVE THE POTENTIAL TO AFFECT PROPOSED CHANGES IN OTHER 2023 MPA PETITIONS?

Yes. The proposed change would conflict with the Tribally-led petition submitted by the Santa Ynez Band of Chumash Indians (2023-20MPA), which proposes a change (2023-20MPA_4) to add a tribal exemption for the Santa Ynez Band of Chumash Indians at Point Buchon SMCA.

2023-34MPA_2 & 2023-34MPA_3: Change regulations to allow only recreational spearfishing within Farnsworth Onshore & Farnsworth Offshore SMCA boundaries

QUESTION 1: 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?

The MLPA Goals and Master Plan objectives are inextricably linked and act as the foundational tools that CDFW utilizes for effective adaptive management of the MPA Network. Individual MPAs in the Network were not necessarily designed to address all six goals of the MLPA but instead act as an important component of a functioning Network that was designed to holistically address the MLPA Goals. As such, CDFW has evaluated this action within the broader adaptive management framework and how the proposed action may or may not align with the MLPA Goals/Master Plan objectives and advance MPA Network management. See Question 1 of Attachment 1 for the MLPA Goals and Master Plan objectives.

The petitioner asserts the proposed action aligns with MLPA Goals 1, 2, and 5 related to preserving natural diversity, sustaining marine life populations, and ensuring California's MPAs have clearly defined objectives, effective management measures and adequate enforcement and are based on sound scientific guidelines. During the MLPA Initiative Planning Process, the two affected MPAs were designed to meet Goals 1, 2, 4, 5, and 6. Thus the proposed change would offer no change in the design of these affected MPAs.

The affected MPAs were designed to balance conservation of unique, sensitive seafloor habitat and marine life, including California hydrocoral, while preserving opportunities for recreational fishing and the commercial squid and swordfish harpoon fleets. This intent is still relevant today.

The proposed change does not align with MPA Master Plan adaptive management objectives. Available information does not demonstrate that further restricting allowed gear types in the affected MPAs would produce measurable ecological benefits beyond current conditions (see Question 9 on how these MPAs meet SAT guidelines to serve as High LOP habitat replicates and Question 13 regarding whether the change would enhance protection of marine resources). Monitoring data does not indicate declines in key protected resources, such as California hydrocoral, that would justify additional restrictions. Concerns raised regarding illegal fishing are primarily related to enforcement challenges rather than regulatory shortcomings and are better addressed through non-regulatory measures. Implementing the proposed change would therefore be inconsistent with the original intent of the MPAs, unlikely to advance MLPA Goals, and would unnecessarily impact recreational and commercial fisheries.

QUESTION 2A: DOES THE PROPOSED CHANGE ADVANCE ADAPTIVE MANAGEMENT RECOMMENDATIONS IN THE DECADAL MANAGEMENT REVIEW?

No. The proposed change does not advance any adaptive management recommendations from the Decadal Management Review. The petition states that the proposed change would:

"...advance DMR Recommendation 4.b.) 'Identify and utilize best science-based approaches to inform potential changes to the MPA Network in order to enhance Network performance.' Since the creation of the MPA network, a decade of scientific peer-reviewed research from around the world has shown that highly to fully protected areas provide the greatest benefits for biodiversity conservation, and that partially protected areas only hinder enforcement, public understanding, and conservation outcomes."

The affected MPAs already meet the size, spacing, and LOP SAT guidelines to serve as habitat replicates, facilitating ecological connectivity within the MPA Network. Given the

Farnsworth MPAs already have a High LOP, the proposed change would not increase the LOP of these MPAs. See Question 2a of Attachment 1 for the Decadal Management Review and adaptive management Recommendations.

QUESTION 2B: IF NOT, DOES THE PROPOSED CHANGE ADDRESS A CURRENT OR EMERGING MPA MANAGEMENT CHALLENGE?

No. The proposed change does not address an emerging MPA management challenge. The petitioner's stated problem related to the affected MPA's current protection status is inaccurate (see Question 9 for how these MPAs meet SAT criteria to serve as habitat replicates with a High LOP). Concerns raised regarding illegal fishing are primarily related to education, outreach, and enforcement challenges rather than regulatory shortcomings and are better addressed through non-regulatory measures (see Question 11 related to compliance concerns and enforceability). Monitoring data does not indicate declines in key protected resources, such as California hydrocoral, that would justify additional fishing restrictions (see Question 13 related to the potential for the proposed action to maintain or enhance protection of marine resources).

QUESTION 3: 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)?

No. Farnsworth Onshore SMCA and Farnsworth Offshore SMCA both overlap with administrative kelp bed lease #105; however, neither existing nor proposed regulations include kelp harvest. Thus, the proposed change would not require CFGC to make conforming changes.

CDFW does not anticipate that CFGC would need to make conforming changes to other regulations, permits, or leases in response to the proposed change to these MPA regulations.

QUESTION 4: DOES THE PROPOSED CHANGE HAVE THE POTENTIAL TO AFFECT EXISTING REGULATIONS, PERMITS, LEASES, OR MANAGEMENT ACTIVITIES OF ANY OTHER AGENCY OR ENTITY?

No. While Farnsworth Offshore SMCA encompasses an existing Area of Special Biological Significance designated by the State Water Resources Control Board and Los Angeles Regional Water Quality Control Boards, it is unclear whether the proposed change would have direct or indirect effects on the management activities of the Water Boards. CDFW does not anticipate that the Santa Catalina Island Company and Santa Catalina Island Conservancy would need to update their Farnsworth Area of Special Biological Significance Compliance Plan in response to the proposed change.

This list may not be exhaustive. The proposed change may have the potential to affect existing regulations, permits, leases, or management activities of Tribal governments, other agencies, and entities not identified here.

QUESTION 5: ARE THERE SIGNIFICANT INFORMATION GAPS THAT NEED TO BE FILLED TO INFORM THE EVALUATION OF THE PROPOSED CHANGE?

No. CDFW has sufficient information to evaluate and make a recommendation on this proposal. When evaluating this petition, CDFW reviewed the information in the petition as well as information including but not limited to:

- The status of California hydrocoral (MPA long-term monitoring data; Wong et al. 2026),
- Prior reports of benthic impacts and debris at Farnsworth Bank (SWRCB 1981, Love et al. 2010),
- The status of the market squid fishery (CDFW 2024),
- CDFW’s enforcement and compliance data, and
- MLPA Initiative planning documents and related information (e.g., MLPA Goals and MPA Master Plan adaptive management objectives).

CDFW reviewed the available information, and the proposed solution is unlikely to enhance protection beyond what is currently offered, is inconsistent with the original intent of the MPA, and would unnecessarily impact recreational and commercial fishing opportunities.

QUESTION 6: ARE THERE SIGNIFICANT MANAGEMENT GAPS THAT NEED TO BE FILLED TO INFORM THE EVALUATION OF THE PROPOSED CHANGE?

No. CDFW has sufficient management information to proceed with the evaluation of this proposed change.

QUESTION 7A: WAS THE PROPOSED CHANGE CONSIDERED DURING THE MLPA INITIATIVE PLANNING PROCESS OR THE IMPLEMENTATION PROCESS OF MPAS AROUND THE NORTHERN CHANNEL ISLANDS?

No. During the MLPA Initiative Planning Process, none of the alternatives at Farnsworth were limited to spearfishing only. Take allowances at Farnsworth were heavily deliberated during the MLPA Planning Process, including several partial-take options as well as a single SMR that extended out to the three-mile state waters boundary (MLPA 2009b). This area was noted as a particular challenge due to high levels of commercial and recreational use in addition to military constraints on San Clemente Island (MLPA 2009c). The final configuration of MPAs that was adopted by CFGC balanced commercial and recreational take while protecting sensitive benthic habitat (MLPA 2009c).

QUESTION 7B: IS THERE NEW INFORMATION AVAILABLE, CHANGING CONDITIONS SINCE THE MLPA IMPLEMENTATION PHASE, AND/OR INFORMATION PRESENTED IN THE DMR THAT WARRANTS REEVALUATION OF THE PROPOSED CHANGE?

No. The petition states concerns with alleged illegal take of groundfish and the associated impacts to benthic habitat for California hydrocoral and abalone, as well as a lack of clarity in the existing regulations for allowable uses between Farnsworth Onshore and Offshore SMCAs. As stated in Question 7a, the regulations at the Farnsworth MPAs were carefully crafted and intentionally designed to support pelagic surface activities that are less likely to negatively impact the key species of California hydrocoral and the benthic habitat. Long-term MPA monitoring data using ROVs does not indicate declines in key protected resources, such as California hydrocoral, that would justify additional restrictions (see Question 13 related to protection of marine resources).

Concerns raised regarding illegal fishing are primarily related to education and outreach and enforcement challenges and less to do with public confusion around the MPA regulations (see Question 11 related to compliance concerns and enforceability) and would be better addressed through non-regulatory methods.

QUESTION 8: 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 PROCESS OF MPAS AROUND THE NORTHERN CHANNEL ISLANDS?

No. The current regulations for both affected MPAs were designed to allow specific types of pelagic recreational and commercial fishing that minimize bottom contact and protect benthic habitat. The regulatory allowance for commercial squid and commercial swordfish by harpoon was included in these SMCAs to balance ecological objectives with socioeconomic concerns raised by the fleets.

Both MPAs, especially the Farnsworth Onshore SMCA, continue to be important fishing areas for California market squid. Commercial Fishing Block 807, which contains both MPAs, holds the highest total commercial value for market squid south of the Palos Verdes Peninsula, totaling over \$23 million from 2013-2024 (Figure 1).

QUESTION 9: DOES THE PROPOSED CHANGE IMPROVE INDIVIDUAL MPA OR MPA NETWORK DESIGN SO THAT IT BETTER ALIGNS WITH OR MEETS THE MPA SCIENCE GUIDELINES?

No. The MLPA requires that the design of individual MPAs and the statewide MPA Network be based on the best readily available science and that MPAs be of adequate size, number, protection level, and location to meet MLPA Goals. The science guidelines

developed by the SAT and outlined in the Master Plan were created specifically to provide this scientific foundation and serve as the starting point for evaluating alternative MPA proposals. Alignment with these guidelines depends on level of protection, which is determined by allowed take, and spatial configuration. More specifically, these guidelines require that an MPA must be at least 9 square miles and meet one of the three highest LOPs (i.e., Very High, High, or Moderate-high) to contribute to ecological goals such as habitat replication and representation.

Farnsworth Onshore and Offshore SMCAs currently meet both minimum criteria, and thus already contribute to foundational ecological Network objectives. Modifying the regulations to allow only recreational spearfishing would not change the existing High LOP. Since the proposed action would not change the size or LOP of the SMCAs, implementation would not improve the design of the individual MPAs or the MPA Network, nor would it enhance alignment with the MLPA Science Guidelines. See Question 9 of Attachment 1 for the MPA Science Guidelines and additional context.

QUESTION 10A: DOES THE PROPOSED CHANGE ALIGN WITH CDFW FEASIBILITY GUIDELINES?

Yes. The proposed change aligns with CDFW Feasibility Guidelines, as it would simplify the regulations, which has the potential to increase enforceability. See Question 10a of Attachment 1 for the CDFW Feasibility Guidelines.

QUESTION 10B: 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?

Not applicable.

QUESTION 11: DOES THE PROPOSED CHANGE MAINTAIN OR IMPROVE ENFORCEABILITY OF MPA REGULATIONS?

Yes. In general, reducing take allowances and allowed activities in these MPAs would enhance enforceability. It can be difficult for enforcement officers to intercept violators at Farnsworth Offshore SMCA if violators can detect and evade (e.g., dumping illegal catch overboard) patrol vessels before they arrive at the scene. However, MED has confirmed that most commercial sportfishing operations comply with the regulations. Since electronic citation tracking started in 2016, MED has issued fewer than seven citations per year in Farnsworth Offshore SMCA (with the exception of 15 citations in 2020) and fewer than three citations per year at Farnsworth Onshore SMCA (which averages to less than one per year in the 10-year span, Table 1).

Reducing the affected MPAs' take allowances to spearfishing only may address some of the petitioner's concerns with non-compliance and improve enforceability for the regulations; however non-regulatory efforts such as improved outreach and support for additional enforcement, including the use of technology like M2 radar, are alternative solutions that would support surveillance and help to address non-compliance at this site. These alternative solutions may be more effective than a regulatory change.

QUESTION 12: DOES THE PROPOSED CHANGE SIMPLIFY REGULATORY LANGUAGE OR ENHANCE PUBLIC UNDERSTANDING WITHOUT CHANGING THE INTENT OF THE MPA?

No. Although reducing take allowances/allowed activities in MPAs would simplify regulatory language, the proposed change to allow only spearfishing in both affected MPAs would change the intent of the MPAs to maintain other types of recreational pelagic fishing, as well as fishing for commercial squid and commercial swordfish by harpoon (see Question 8 for more information on intent of these MPAs).

QUESTION 13: DOES THE PROPOSED CHANGE MAINTAIN OR ENHANCE PROTECTION OF MARINE RESOURCES?

Yes. The proposed change to allow only recreational spearfishing in the Farnsworth Onshore and Offshore SMCAs would likely result in fewer hook-and-line fishery interactions with pelagic species. Although pelagic species may not be the primary species to benefit from MPAs in general, as many are highly mobile and have large geographic ranges, the proposed change may enhance protection when individuals are present in these MPAs.

During the MLPA Initiative Planning Process, the intention of both MPAs was to protect species associated with the benthic habitat; species listed as likely to benefit included rockfishes (*Sebastes* spp.), kelp bass (*Paralabrax clathratus*), scorpionfish (*Scorpaena guttata*), giant sea bass (*Stereolepis gigas*), sheephead (*Bodianus pulcher*), angel shark (*Squatina squatina*), lobster (*Panulirus interruptus*), rock scallops (*Crassadoma gigantea*), black abalone (*Haliotis cracherodii*), and white abalone (*Haliotis sorenseni*) (MLPA 2009d). Thus, the proposed change alone is unlikely to enhance protection of these benthic species.

The proposed change would maintain the overall LOP of both MPAs. At the individual MPA level, Farnsworth Onshore and Offshore SMCAs currently meet size and LOP SAT guidelines, and thus already contribute to foundational ecological Network objectives. Modifying the regulations to allow only recreational spearfishing would not change the existing High LOP.

Regarding protection of California hydrocoral, the petitioner states,

“the risk of damage to this highly sensitive ecological area is too high to allow even for pelagic fishing activities, which can result in bottom disturbance and bycatch. For instance, party boat patrons have often been observed dropping weighted lines that interact with bottom habitat...”

Anchoring is likely to pose a greater risk to benthic resources than alleged illegal groundfish take. Although the extent to which anchoring or illegal fishing with bottom contact gear has affected hydrocoral within the Farnsworth SMCAs since implementation is uncertain, long-term MPA monitoring using ROVs shows substantial increases in California hydrocoral (up to 455%) across bioregions following the 2013–2014 marine heatwave (Wong et al. 2026). Additionally, ROV surveys as of 2021 indicate hydrocoral densities at Farnsworth were comparable to or higher than other sites surveyed in the same year (Table 2). Thus, the proposed regulatory change is unlikely to enhance protection of California hydrocoral. Non-regulatory measures, such as the installation and ongoing maintenance of mooring buoys, would likely be a far more effective tool to protect California hydrocoral.

QUESTION 14: DOES THE PROPOSED CHANGE PROVIDE MORE EQUITABLE ACCESS OPPORTUNITIES (E.G., FISHING, EDUCATIONAL, AND/OR OTHER RECREATIONAL OPPORTUNITIES) FOR TRADITIONALLY UNDERSERVED OR MARGINALIZED COMMUNITIES?

See Question 14 of Attachment 1.

QUESTION 15: DOES THE PROPOSED CHANGE HAVE THE POTENTIAL TO AFFECT CONSUMPTIVE AND/OR NON-CONSUMPTIVE ACTIVITIES? IF SO, HOW?

Yes. Changing the MPA regulations to allow only recreational spearfishing within the Farnsworth Onshore and Offshore SMCAs is likely to pose significant impacts to commercial squid fishing (Figure 1) and commercial harpoon fishing for swordfish.

The proposed change is not expected to affect non-consumptive activities.

QUESTION 16: IS THE PROPOSED CHANGE CONSISTENT WITH THE CFGC JUSTICE, EQUITY, DIVERSITY AND INCLUSION POLICY?

See Question 16 of Attachment 1.

QUESTION 17: IS THE PROPOSED CHANGE CONSISTENT WITH THE CFGC COASTAL FISHING COMMUNITIES POLICY?

The following analysis was prepared by CFGC staff. See Question 17 of Attachment 1 for additional context on CFGC's response. The proposed change would reduce fishing access, particularly for commercial coastal pelagic species (including squid) and

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swordfish fishery participants, boat-based recreational anglers, and commercial passenger fishing vessel operators homeported in the coastal fishing communities of:

- San Pedro (~22-24 nm from area of proposed change),
- Ventura (~55-58 nm away from area of proposed change), and/or
- Channel Islands Harbor (Oxnard, ~53-56 nm away from area of proposed change).

There is potential to impact several fisheries currently authorized to use these MPA areas. The exemptions in this MPA cluster were carefully crafted to minimize impacts to select recreational and commercial fisheries while maintaining high levels of protection.

QUESTION 18: DOES THE PROPOSED CHANGE INTERACT WITH OR HAVE THE POTENTIAL TO AFFECT PROPOSED CHANGES IN OTHER 2023 MPA PETITIONS?

No. There are no potential interactions of effects on any of the other 2023 MPA petitions.

V. SUPPLEMENTAL ANALYSES, DATA AND INFORMATION, AND CITATIONS

TABLES AND FIGURES

Table 1. CDFW Marine Enforcement District total citations for Point Buchon State Marine Conservation Area (SMCA), Point Buchon State Marine Reserve (SMR), and Farnsworth Onshore and Offshore SMCAs between 2016 and 2025.

MPA	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Point Buchon SMCA	2	4	9	0	1	3	19	5	0	0
Point Buchon SMR	7	7	7	17	21	3	30	7	0	2
Farnsworth Offshore SMCA	7	4	1	5	15	3	6	0	2	2
Farnsworth Onshore SMCA	3	2	0	0	0	1	1	0	0	2

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Table 2. Density of California hydrocoral colonies per 100m² from remotely operated vehicle (ROV) long term MPA monitoring surveys, by geographic region in California and survey location* between 2019 and 2021. High density locations provided in bold. Only locations* with hydrocoral present are included. The sampling unit is based on 10m long subsegments of ROV transects with 50% or more rocky substrate. Year and location combinations with no data indicate that surveys were not performed. Unless specified, the density reported is from pooled data of all sites (MPA status protected and unprotected) that were surveyed at each location.

Bioregion	Survey Location	ROV Survey Year		
		2019	2020	2021
North	Point St. George		0.1	0.1
	Sea Lion Gulch		102.3	291.7
	Point Arena			0.1
	Bodega Bay	6.5	3.2	
	North Farallon Islands		31.2	
	South East Farallon Islands	77.2	51.6	
Central	Portuguese Ledge	0.5		
	Cypress Point	52.2		41.1
	Point Lobos SMR	53.4		24.2
	Point Sur	14.5		13.3
	Big Creek		5.9	
	Piedras Blancas		0.1	
	Point Buchon	0.9		2.1
South	Harris Point SMR (San Miguel Island)		5.9	

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Castle Rock (San Miguel Island)	5.2	4.9
South Point SMR (Santa Rosa Island)	0.1	
Rodes Reef (Santa Rosa Island)	0.02	
Gull Island SMR (Santa Cruz Island)	0.1	
Cluster Point (Santa Rosa Island)	8.2	5.1
Catalina Island (All Sites)	16.3	19.1
Farnsworth Offshore SMCA	69	61

* Note that ROV survey locations for long-term MPA monitoring in California were originally selected based on surveying groundfish and thus, not all existing ROV survey locations for MPA monitoring include California hydrocoral habitat.

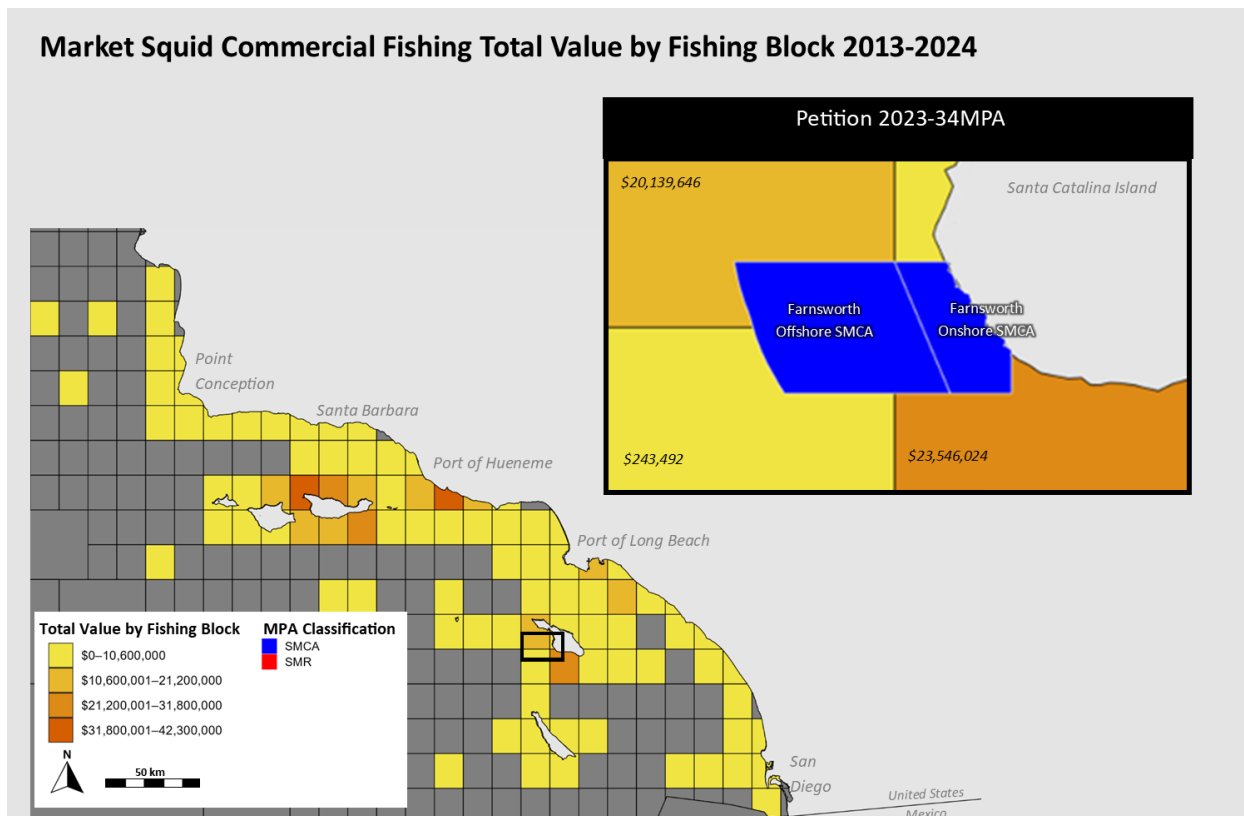


Figure 1. Total value (in millions \$US) of commercially caught California market squid (*Doryteuthis opalescens*) from 2013 to 2024 by California Department of Fish and Wildlife fishing block for the South Coast Bioregion with reference to petitions 2023-34MPA. Actual value provided within fishing blocks that overlap with the proposed regulatory changes to Farnsworth Onshore and Offshore State Marine Conservation Areas (SMCA).

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