



## Staff Summary for April 15-16, 2026

**(B) *New Petitions for Regulation Change – Receipt***

Pursuant to Section 662, any person requesting that the Commission adopt, amend, or repeal a regulation must complete and submit Form FGC 1. Petitions submitted by the public are “received” at this meeting if they are delivered by the public comment or supplemental comment deadlines or in person at the Commission meeting.

Under the Bagley-Keene Open Meeting Act, the Commission cannot discuss or act on any matter not included on the agenda, other than to determine whether to schedule issues raised by the public for consideration at future meetings. Thus, petitions for regulation change generally follow a two-meeting cycle of receipt and decision. The Commission will act on petitions received at today’s meeting at the next regularly-scheduled Commission meeting (June 17-18, 2026) following staff evaluation, unless the petition is rejected under the 10-day staff review as prescribed in subsection 662(b).

The Commission received two new petitions for regulation change by the comment deadline for this meeting: One related to processing commercial spiny lobster catch into tails (Exhibit B1), and one related to the recreational bag limit for California halibut (Exhibit B2).

**(C) *Comments Received on Referred Petitions***

This item provides an opportunity for public comment on any petition previously referred for review and recommendation, but not yet ready for Commission action. Action on any referred petition will be scheduled once the Commission receives a recommendation.

*Referred Marine Protected Area (MPA) Petitions*

*Comments on individual MPA petitions currently under review are received under this item. Department evaluations and recommendations for MPA petitions will be heard under Agenda Item 2.*

*MPA petitions are scheduled for petitioner presentation and public discussion at regional MPA petition Commission meetings on April 21, May 5-6, and May 19 (for more details, see [www.fgc.ca.gov/meetings/2026](http://www.fgc.ca.gov/meetings/2026)).*

**Significant Public Comments****(A) *Petitions for Regulation Change – Scheduled for Action***

- Petition 2025-19: Gary Maganaris expresses disappointment in having one minute to provide comment at the February Commission meeting when this petition was received. However, he provides his full planned testimonial, which details the justifications for their petition and provides answers to anticipated commissioner questions (Exhibit A5).

**(C) *Comments on Referred MPA Petitions***

The Commission received more than 40 individual letters and emails, which together include over 75 petition-specific comments related to the referred MPA petitions. For letters that addressed multiple petitions, each petition-specific comment has been

## Staff Summary for April 15-16, 2026

individually summarized in a table in Exhibit C1. The table groups the unique comments by petition number for ease of review.

Some comments listed in the table also appear with exhibits under [Item 2 \(Evaluations and Recommendations for Non-Tribally Led or Co-Led MPA Petitions\)](#) because they addressed both topics. To avoid duplication, the table in Exhibit C1 directs readers to the corresponding exhibit numbers in Item 2 and links directly to the Item 2 materials rather than reproducing them here. Copies of comments relevant only to Item 5 (exhibit C2-C33) are combined into Exhibit C1 are included and linked within the summary table.

## Recommendation

**Commission staff:** Petition 2025-14 (Pismo clam): Grant, in part, for consideration in a future rulemaking, as recommended by the Department, and request that the Department bring an update, options and timeline to MRC in November 2026. Petition 2025-19 (recreational crab trap buoys): Refer to the Department for review and recommendation.

**Department:** Grant Petition 2025-14, in part, for consideration in a future rulemaking, for the reasons outlined in Exhibit A3.

## Exhibits

- A1. [Summary table of petitions and staff recommendations](#), updated April 6, 2026
- A2. [Petition 2025-14](#), received October 8-9, 2025
- A3. [Department memo](#), received February 19, 2026
- A4. [Petition 2025-19](#), received February 11-12, 2026
- A5. [Email from Gary Maganaris](#), received February 13, 2026
- B1. [Summary table of petitions received](#), updated April 6, 2026
- B2. [Petition 2026-02](#), received March 12, 2026
- B3. [Petition 2026-03](#), received March 23, 2026
- C1. [Summary table of comments on referred MPA petitions](#), and combined individual comments (exhibits C2-C33), received between February 6 and April 2, 2026.

## Motion

Moved by \_\_\_\_\_ and seconded by \_\_\_\_\_ that the Commission adopts the staff and Department recommendations to *grant* Petition 2025-14, in part, for consideration in a future rulemaking, and request that the Department bring an update, options and timeline to the Marine Resources Committee in November 2026, and to *refer* Petition 2025-19 to the Department for its review and recommendation.

**California Fish and Game Commission  
Petitions for Regulation Change – Action (updated April 6, 2026)**

CFGC - California Fish and Game Commission CDFW - California Department of Fish and Wildlife WRC - Wildlife Resources Committee MRC - Marine Resources Committee MR - Marine Region

MPA - marine protected area SMR - state marine reserve SMCA - state marine conservation area

Grant: CFGC is willing to consider the petitioned action through a process Deny: Not willing to consider the petitioned action Refer: Need more information before the final decision

Tracking No.	Date Received	Name of Petitioner	Short Description	CFGC Receipt	CFGC Initial Action Date	Initial Staff Recommendation	Scheduled for Final Action	Final Staff Recommendation
2025-14	10/3/2025	Jorge Garcia, City of Pismo Beach	Request to reduce Pismo clam bag limit	10/8-9/2025	12/10-11/2025	REFER to CDFW for evaluation and recommendation.	4/15-16/2026	<p>CDFW: GRANT in concept for further evaluation and potential rulemaking, based on rationale in CDFW's memo, which notes that CDFW will need to complete a comprehensive review of the Pismo clam fishery and additional outreach to tribes and the public to ensure sustainable management measures are reached.</p> <p>Staff: GRANT in concept for further evaluation and potential rulemaking, as recommended by CDFW, and request that the Department bring an update, options and timeline to MRC in November 2026.</p>
2025-19	12/8/2025	Gary Maganaris Coastside Fishing Club	Amend recreational crab trap buoy regulations to reduce whale entanglement risks	2/11-12/2025	4/15-16/2026	REFER to CDFW for evaluation and recommendation.		



Tracking Number: ( 2025-14 )

To request a change to regulations under the authority of the California Fish and Game Commission (Commission), you are required to submit this completed form to: California Fish and Game Commission, (physical address) 1416 Ninth Street, Suite 1320, Sacramento, CA 95814, (mailing address) P.O. Box 944209, Sacramento, CA 94244-2090 or via email to [FGC@fgc.ca.gov](mailto:FGC@fgc.ca.gov). Note: This form is not intended for listing petitions for threatened or endangered species (see Section 670.1 of Title 14).

Incomplete forms will not be accepted. A petition is incomplete if it is not submitted on this form or fails to contain necessary information in each of the required categories listed on this form (Section I). A petition will be rejected if it does not pertain to issues under the Commission's authority. A petition may be denied if any petition requesting a functionally equivalent regulation change was considered within the previous 12 months and no information or data is being submitted beyond what was previously submitted. If you need help with this form, please contact Commission staff at (916) 653-4899 or [FGC@fgc.ca.gov](mailto:FGC@fgc.ca.gov).

## **SECTION I: Required Information.**

*Please be succinct. Responses for Section I should not exceed five pages*

### **1. Person or organization requesting the change (Required)**

Name of primary contact person: Jorge Garcia, City Manager

Address: City of Pismo Beach, 760 Mattie Road, Pismo Beach, CA 93449

Telephone number: 805.773.4657

Email address: [jgarcia@pismo-beach.org](mailto:jgarcia@pismo-beach.org)

### **2. Rulemaking Authority (Required) - Reference to the statutory or constitutional authority of the Commission to take the action requested:** California Fish and Game Code Sections 205 and 219.

### **3. Overview (Required) - Summarize the proposed changes to regulations:** Request to amend Title 14, Sec 29.40(a) to include the City of Pismo Beach with the Counties of Santa Cruz and Monterey and request to amend Title 14, Sec 29.40(b) by reducing ten (10) to a lower number to be determined.

### **4. Rationale (Required) - Describe the problem and the reason for the proposed change:** The problem is the Pismo Clam population is dwindling with no known scientific data to support why or how. Recently a perceived increase in the number of mature Pismo Clams created a false sense of security that the Pismo Clam population is thriving to the point of never having to worry about the catastrophic decline that the City of Pismo Beach, witnessed before the 1980's. Amending the regulations is the core basis to protect, preserve, and provide a sustainable Pismo Clam population in the future.

The reason for the proposed change, which is championed by the City Council of the City of Pismo Beach, is to ensure that Pismo Clams will never face extinction and be available for responsible clamming for future generations. By limiting the clamming season and reducing the number of clams that may be held per person, per day, the City Council seeks to protect the existing population to:

1. Preserve the population so that clams may be clammed responsibly and reasonably,



2. Create an established baseline of Pismo Clams for scientific research, monitoring and protecting, and
3. Provide a family-oriented activity that will be sustainable for generations to come. |

## SECTION II: Optional Information

5. **Date of Petition:** |October 3, 2025. |

6. **Category of Proposed Change**

- Sport Fishing
- Commercial Fishing
- Hunting
- Other, please specify: |Click here to enter text. |

7. **The proposal is to:** *(To determine section number(s), see current year regulation booklet or <https://govt.westlaw.com/calregs>)*

- Amend Title 14 Section(s):|29.40(a) and 29.40(b). |
- Add New Title 14 Section(s): |Click here to enter text. |
- Repeal Title 14 Section(s): |Click here to enter text. |

8. **If the proposal is related to a previously submitted petition that was rejected, specify the tracking number of the previously submitted petition** |Click here to enter text. |  
Or  Not applicable.

9. **Effective date:** If applicable, identify the desired effective date of the regulation.  
If the proposed change requires immediate implementation, explain the nature of the emergency: |July 1, 2026. |

10. **Supporting documentation:** Identify and attach to the petition any information supporting the proposal including data, reports and other documents: |

1. City of Pismo Beach Staff Report 2025.06.18 Pismo Clamming Education and Outreach
  - a. City Council directed staff to increase education and outreach activities for responsible clamming in the City.
2. City of Pismo Beach Staff Report 2025.09.02 Pismo Clam Regulations Discussion
  - a. City Council directed staff to submit a petition requesting to amend Title 14 Sections 29.40(a) and (b) by including the City of Pismo Beach in a limited clamming season and reducing the number of Pismo Clams that may be taken per person per day.
3. Marquardt Et Al Aquatic Biology Pismo Clam Age Spawning 2022
  - a. Research project that focused on reproduction, age and growth of Pismo Clams which estimated that it takes at least 11 years for a Pismo Clam to reach a mature age/size.  
|



**11. Economic or Fiscal Impacts:** Identify any known impacts of the proposed regulation change on revenues to the California Department of Fish and Wildlife, individuals, businesses, jobs, other state agencies, local agencies, schools, or housing: Historically, Pismo Clams were harvested in the millions on Pismo Beach and supported various commercial and recreational fisheries for decades.

Since the 1980’s, the Pismo Clam populations on the Central Coast, most notably in Pismo Beach has declined and a legal sized Pismo Clam (at least 4.5”) has not been found in Pismo Beach since 1993. While the commercial fishery industry ended in 1947, recreational fisheries remained active for nearly another half century. Currently, many clamming activities are performed by individuals/families that intend to consume the Pismo Clams and not sell them. For that reason, the City of Pismo Beach is not aware of any negative impact to CDFW, individuals, businesses, jobs, state agencies, local agencies, schools or housing from the proposed regulation changes. |

**12. Forms:** If applicable, list any forms to be created, amended or repealed: |There are no known forms to be created, amended or repealed if this petition is approved. |

**SECTION 3: FGC Staff Only**

Date received: | 10/3/2025 |

FGC staff action:

- Accept - complete
- Reject - incomplete
- Reject - outside scope of FGC authority

Tracking Number

Date petitioner was notified of receipt of petition and pending action: \_\_\_\_\_ |

Meeting date for FGC consideration: \_\_\_\_\_ |

FGC action:

- Denied by FGC
- Denied - same as petition \_\_\_\_\_

Tracking Number

- Granted for consideration of regulation change

# MEMORANDUM

Date: March 4, 2026

Received March 19, 2026  
Original signed copy on file

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

From: Meghan Hertel, Director

Subject: **Response to Petition #2025-14: Request to modify recreational Pismo Clam regulations**

At their December 11, 2025 meeting, the California Fish and Game Commission (Commission) referred a petition for regulation change (2025-14) to the Department of Fish and Wildlife (Department) for review and recommendation. The petition submitted by Mr. Jorge Garcia, City Manager, City of Pismo Beach (Applicant), requests to amend Sections 29.40(a) and (b) of Title 14, California Code of Regulations. The proposed change would establish a seasonal closure and reduced the bag limit within the City of Pismo Beach.

Section 29.40(a) of Title 14 establishes the open season for harvest of Pismo clams. Pismo clams may be taken in Monterey and Santa Cruz counties from September 1 through April 30; in all other counties, Pismo clams may be taken year-round. Section 29.40(b) of Title 14 establishes a bag limit of 10 clams per person.

California's Pismo clam population was once large enough to support both commercial and recreational fisheries. Heavy fishing pressure along with other factors such as poor recruitment and predation drastically reduced the abundance of Pismo clams in the state. Pismo clam abundance has increased in recent years both along Pismo Beach and in other regions of central and southern California, primarily due to strong recruitment events. However, recruitment events are difficult to predict and there have been extreme fluctuations in population abundance repeatedly over the last 90 years, particularly off Pismo Beach.



Melissa Miller-Henson, Executive Director  
California Fish and Game Commission  
March 4, 2026  
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The Department recommends the petition be granted in concept for further evaluation and potential rulemaking. The Department will need to conduct a comprehensive review of the Pismo clam fishery and conduct additional outreach to tribes and the public to ensure sustainable management measures are reached.

If you have any questions regarding this item, please contact Dr. Craig Shuman, Marine Regional Manager at (805) 568-1246 or by email at [R7regionalmgr@wildlife.ca.gov](mailto:R7regionalmgr@wildlife.ca.gov).

cc: **California Department of Fish and Wildlife**

Chad Dibble, Deputy Director  
Wildlife and Fisheries Division

Craig Shuman, D. Env., Regional Manager  
Marine Region

Eric Kord, Assistant Chief  
Law Enforcement Division

Joanna Grebel, Environmental Program Manager  
Marine Region



Tracking Number: ( 2025-19 )

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Incomplete forms will not be accepted. A petition is incomplete if it is not submitted on this form or fails to contain necessary information in each of the required categories listed on this form (Section I). A petition will be rejected if it does not pertain to issues under the Commission’s authority. A petition may be denied if any petition requesting a functionally equivalent regulation change was considered within the previous 12 months and no information or data is being submitted beyond what was previously submitted. If you need help with this form, please contact Commission staff at (916) 653-4899 or FGC@fgc.ca.gov.

**SECTION I: Required Information.**

*Please be succinct. Responses for Section I should not exceed five pages*

**1. Person or organization requesting the change (Required)**

Name of primary contact person: Gary Maganaris, Coastside Fishing Club Board Member on behalf of all members of Coastside Fishing Club. This petition is also being requested by Duane Winter, President of the Tye Club on behalf of all Tye Club members..

Address: [REDACTED]

Telephone number: [REDACTED]

Email address: [REDACTED]

**Rulemaking Authority (Required)** - Reference to the statutory or constitutional authority of the Commission to take the action requested: Authority cited: Sections 200, 205, 399, 7075 and 7078, Fish and Game Code

**Overview (Required)** - Summarize the proposed changes to regulations: **Amendment to Recreational Crab Trap Buoy Regulations to Reduce Whale Entanglement Risk**

The petitioner requests that the California Fish and Game Commission amend the existing recreational crab trap buoy regulation to authorize the use of two main buoys and one red marker buoy, replacing the current requirement of one main buoy and one red marker buoy.

This modification would enhance surface gear visibility and stability, thereby reducing the likelihood of lost traps and associated whale entanglements..

Please note that this petition is being made all the members of both Coastside Fishing Club as well as the Tye Club, which combined have over 2,000 active recreational fishing members.



**Rationale (Required)** - Describe the problem and the reason for the proposed change: Under current recreational crab fishing regulations, only one main buoy and one red marker buoy are permitted for each trap. This limitation can result in insufficient buoyancy and decreased visibility under certain sea conditions, leading to submerged or lost gear. Lost crab traps contribute to marine debris and increase the risk of whale entanglement—a concern that directly impacts marine resource conservation and compliance with the Marine Life Protection Act.

The proposed amendment would allow recreational crab fishers to deploy two main buoys placed no more than six (6) feet apart, along with one red marker buoy positioned no more than three (3) feet from the main buoys. This change would:

- Improve surface visibility and buoyancy of trap lines;
- Reduce the risk of gear submergence and loss;
- Enhance trap retrieval efficiency and safety; and
- Contribute to marine wildlife protection by minimizing the potential for entanglement in derelict gear.

For reference, commercial Dungeness crab gear regulations (California Code of Regulations, Title 14, §132.2) allow for one main buoy with a biennial tag, up to two “trailer buoys,” and one end marker buoy, with surface line length limits of 24 feet for depths of 210 feet or less and 36 feet for depths greater than 210 feet.

Aligning recreational regulations more closely with these commercial standards would increase consistency, improve environmental safety, and reduce the risk of gear loss that contributes to whale entanglement events.

## SECTION II: Optional Information

2. **Date of Petition:** [12/04/2025.]

3. **Category of Proposed Change**

Sport Fishing

Commercial Fishing

Hunting

Other, please specify: [Click here to enter text.]

4. **The proposal is to:** (To determine section number(s), see current year regulation booklet or <https://govt.westlaw.com/calregs>)

Amend Title 14 Section(s): **Section 29.80, subsection (c)(3)**

Add New Title 14 Section(s): [Click here to enter text.]

Repeal Title 14 Section(s): [Click here to enter text.]

5. **If the proposal is related to a previously submitted petition that was rejected, specify the tracking number of the previously submitted petition** [Click here to enter text.]

Or  Not applicable.

6. **Effective date:** If applicable, identify the desired effective date of the regulation.

If the proposed change requires immediate implementation, explain the nature of the emergency: [November 2026.]



**Supporting documentation:** Identify and attach to the petition any information supporting the proposal including data, reports and other documents: |The proposed configuration mirrors proven commercial practices that improve gear recovery and reduce entanglement risks.

Adoption would not increase the total number of traps or impact catch limits.

This change promotes consistency, safety, and environmental protection in line with state marine resource objectives. |

**7. Economic or Fiscal Impacts:** Identify any known impacts of the proposed regulation change on revenues to the California Department of Fish and Wildlife, individuals, businesses, jobs, other state agencies, local agencies, schools, or housing: |None.

**8. Forms:** If applicable, list any forms to be created, amended or repealed:

|Click here to enter text. |

**SECTION 3: FGC Staff Only**

Date received: |12/8/2025 |

FGC staff action:

- Accept - complete
  - Reject - incomplete
  - Reject - outside scope of FGC authority
- Tracking Number

Date petitioner was notified of receipt of petition and pending action: |\_\_\_\_\_ |

Meeting date for FGC consideration: |\_\_\_\_\_ |

FGC action:

- Denied by FGC
  - Denied - same as petition |\_\_\_\_\_ |
- Tracking Number
- Granted for consideration of regulation change

**From:** Gary Maganaris [REDACTED]

**Sent:** Friday, February 13, 2026 01:42 PM

**To:** [REDACTED]

[REDACTED]; Duane Winter

<[REDACTED]>; Kevin Godes - Coastside BOD <[REDACTED]>

**Subject:** Next Steps for Petition 2025-19?: Amendment to Recreational Trap Buoy configurations to Reduce Whale Entanglement Risk

Hello David,

Given that Duane Winter and myself were only able to speak for 1 minute each at your Commission meeting on Wednesday regarding our Petition 2025-19 (which was quite a disappointment as we drove from San Mateo and spent a total of 5 hours in the car round trip with traffic to attend the meeting in person), please include my attached prepared remarks for Commission review (Attachment #1).

Also, Dave Kasheta also pointed out during his 1 minute public comment on our petition that the Department has already acknowledged that 2 buoys are beneficial to reduce the possibility of lost gear with their 2026 change in Recreational Hoopnet regulations (Attachment #2). The specific verbiage the Department used was "The additional marker buoy will facilitate removal within the required service interval period and compensate for the effects of surface gear getting pulled underwater by strong ocean tidal currents."

As I am new to this process, please lay out for me the remaining steps and estimated timeline for possible adoption of our petition. I believe our petition will be approved for Department Review or rejected at your April meeting? Also, do you expect that we will only be able to provide oral testimony for 1 minute for Consent items at the April meeting also? Thanks in advance.

Regards,

Gary Maganaris

[REDACTED]

My name is Gary Maganaris. I'm a board member of the Coastside Fishing Club, speaking today on behalf of more than 2,000 combined members of the Coastside Fishing Club and the Tyee Club.

Thank you for the opportunity to speak in support of our proposed petition to **Amend Recreational Crab Trap Buoy Regulations to Reduce Whale Entanglement Risk**. This petition has been assigned tracking number 2025-19 and will be discussed as part of Agenda item 9(B) today.

At its core, this petition is about reducing lost gear, improving safety, and lowering whale entanglement risk, using a solution that is already proven effective in California fisheries.

Under the current regulation, recreational crabbers are limited to one main buoy and one red marker buoy per trap. In real-world ocean conditions—particularly off the Central and Northern California coast—this configuration can be insufficient. Swell, current, and wind can submerge single buoys, drag lines under, or cause traps to be lost entirely.

When that happens, the consequences extend far beyond the financial impact felt by recreational fishermen. Lost traps become derelict gear, contributing to marine debris and creating an avoidable entanglement risk for whales and other marine life. This is exactly the outcome all of us here are trying to prevent.

The petition before you proposes a very limited and targeted change: allowing recreational crab traps to use two main buoys placed within six feet of each other, along with one red marker buoy within three feet. Nothing more.

This change does not increase the number of allowed traps, does not affect season durations, depth restrictions, or catch limits.

What it does do is increase surface visibility and buoyancy, significantly reducing the likelihood that gear becomes submerged, lost, or abandoned.

Importantly, this proposal mirrors what already works in the commercial Dungeness crab fishery. Commercial regulations allow multiple trailer buoys precisely because they improve gear recovery and reduce environmental risk. Recreational gear, by contrast, is currently held to a more restrictive standard—despite often being deployed in the same waters and conditions.

Aligning recreational regulations more closely with commercial best practices promotes consistency, common sense, and conservation.

From a safety standpoint, clearer and more visible gear also reduces the chance that another boat might run over a deployed trap due to a partially submerged difficult to see single buoy.

From an environmental standpoint, fewer lost traps means less marine debris, fewer entanglement hazards, and better alignment with the goals of the Marine Life Protection Act.

And from a fiscal perspective, this change carries no cost to the Department, no enforcement burden beyond what already exists, and no economic downside.

This is a small regulatory refinement that advances the Commission's conservation goals by keeping recreational crabbing gear more visible, recoverable, and out of the water column where it can do harm. On behalf of our clubs and our members, I respectfully urge the Commission to grant this petition for consideration and move this practical, conservation-minded change forward.

Thank you for your time and for your continued work protecting California's marine resources.

# Anticipated Commissioner Q&A

## 1. How does adding another buoy actually reduce whale entanglement risk?

**Answer:**

By keeping the gear on the surface and retrievable. Most entanglement risk from recreational crab gear comes from lost or submerged traps. Two main buoys significantly increase buoyancy and visibility, which reduces gear loss and prevents lines from lingering unattended in the water column.

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## 2. Wouldn't additional buoys increase the amount of line or surface clutter?

**Answer:**

No. This proposal does not add line length or change line configuration. It only adds flotation at the surface. In fact, clearer surface marking reduces clutter by preventing abandoned or drifting gear.

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## 3. Could this make enforcement more difficult for wardens?

**Answer:**

No. Enforcement remains straightforward. The proposal sets clear spacing limits—two main buoys within six feet and one red marker within three feet—making compliance easy to visually confirm on the water.

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## 4. Why should recreational gear be treated more like commercial gear?

**Answer:**

Because the risk factors are the same—same waters, same species, same ocean conditions. Commercial fisheries already use multiple buoys because it works. This petition simply applies that proven logic to recreational gear, without increasing effort or catch.

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## 5. Is there evidence this won't increase fishing efficiency or catch?

**Answer:**

Yes. Buoy configuration affects gear visibility and recovery, not catch rates. Trap limits, season length, depth restrictions, and catch limits remain unchanged. This proposal improves safety and conservation—not harvest efficiency.

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## 6. Could this lead to calls for even more gear changes later?

**Answer:**

This petition is intentionally narrow. It addresses a specific, well-defined problem—lost recreational gear—and proposes a specific solution with clear limits. Any future proposals would still require separate Commission review.

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**7. Is this something the recreational community actually supports?**

**Answer:**

Yes. This petition is supported by over 2,000 active members from the Coastside Fishing Club and the Tyee Club—many of whom are conservation-minded anglers who want fewer lost traps and safer oceans.

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**8. Why not address this through education instead of regulation?**

**Answer:**

Education helps, but it can't overcome physics. In rough conditions, a single buoy can still submerge or drift under. This regulation gives anglers the tool they need to comply and retrieve their gear successfully.

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**9. Does this create any economic impact or cost to the Department?**

**Answer:**

No. There is no fiscal impact, no additional tagging requirements, and no increase in enforcement workload. It's a low-cost, high-benefit change.

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**10. Why is now the right time to consider this change?**

**Answer:**

Because whale entanglement risk remains a top concern, and this is a preventative measure that can be implemented before gear is lost—not after an incident occurs.

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If you get a tough or skeptical question, **start with alignment:**

“That’s a fair question, Commissioner—and it gets right to the conservation intent behind this petition...”

**California Fish and Game Commission**

**New Petitions for Regulation Change: Received by 5:00 PM on April 2, 2026**

**CFGF - California Fish and Game Commission CDFW - California Department of Fish and Wildlife**

<b>Tracking No.</b>	<b>Date Received</b>	<b>Name of Petitioner</b>	<b>Short Description</b>	<b>FGC Receipt Scheduled</b>	<b>FGC Action Scheduled</b>
2026-02	3/12/2026	Ava Schulenberg CA Lobster & Trap Fisherman's Association	Allow commercial spiny lobster fisherman to process catch into tails for storage, transport, and sale in addition to selling lobster whole or live.	4/15-16/2026	6/17-18/2026
2026-03	3/23/2026	Shawn Kelly	Increase California Halibut sportfishing bag limit to three fish	4/15-16/2026	6/17-18/2026



Tracking Number: ( 2026-02 )

To request a change to regulations under the authority of the California Fish and Game Commission (Commission), you are required to submit this completed form to: California Fish and Game Commission, (physical address) 1416 Ninth Street, Suite 1320, Sacramento, CA 95814, (mailing address) P.O. Box 944209, Sacramento, CA 94244-2090 or via email to FGC@fgc.ca.gov. Note: This form is not intended for listing petitions for threatened or endangered species (see Section 670.1 of Title 14).

Incomplete forms will not be accepted. A petition is incomplete if it is not submitted on this form or fails to contain necessary information in each of the required categories listed on this form (Section I). A petition will be rejected if it does not pertain to issues under the Commission’s authority. A petition may be denied if any petition requesting a functionally equivalent regulation change was considered within the previous 12 months and no information or data is being submitted beyond what was previously submitted. If you need help with this form, please contact Commission staff at (916) 653-4899 or FGC@fgc.ca.gov.

**SECTION I: Required Information.**

*Please be succinct. Responses for Section I should not exceed five pages*

**1. Person or organization requesting the change (Required)**

Name of primary contact person: Ava Schulenberg, California Lobster & Trap Fishermen’s Association (CLTFA)

Address: [Redacted]

Telephone number: [Redacted]

Email address: [Redacted]

**2. Rulemaking Authority (Required) - Reference to the statutory or constitutional authority of the Commission to take the action requested:** The Commission’s authority to adopt the proposed regulation derives from the California Fish and Game Code, including but not limited to Sections 200, 205, and 219, which authorize the Commission to regulate the take, possession, and management of fishery resources, including California spiny lobster.

**3. Overview (Required) - Summarize the proposed changes to regulations:** We propose allowing the option for permitted commercial California spiny lobster fishermen to tail their legally harvested lobster in addition to the current ability to sell lobster whole or live.

**4. Rationale (Required) - Describe the problem and the reason for the proposed change:** Current regulations require that California spiny lobster be landed and sold whole, which limits the ability of commercial fishermen and seafood businesses to adapt to changing market conditions. Allowing the option to tail lobster would provide additional flexibility for fishermen, processors, and distributors while maintaining existing conservation measures and harvest limits.

The proposed change would not alter season dates, size limits, trap limits, or overall harvest levels. Instead, it would simply allow legally harvested lobster to be processed into tails for storage, transport, and sale. This option could improve product handling and reduce spoilage or waste, particularly when live markets are limited or disrupted. Allowing lobster tailing would



also expand access to domestic markets that prefer frozen lobster tails rather than live product, providing additional economic stability for California fishermen and seafood businesses. Increased market flexibility could help the fishery better withstand fluctuations in export demand, transportation challenges, or other market disruptions.

The proposed regulation would maintain current fishery management and conservation objectives while providing practical operational benefits to participants in the fishery. Similar processing practices are common in other lobster fisheries and have not been shown to increase fishing pressure when existing harvest regulations remain in place.

Recent consensus among members of CLTFA indicates that the option to tail lobster should be available to all permit holders. Following meetings with the California Department of Fish and Wildlife, a statewide survey was conducted in May–June 2025 to further evaluate support and concerns regarding the proposal, including input from both members and non-members. Responses were received from 35 commercial lobster fishermen representing multiple ports across California, ranging from newer participants in the fishery to fishermen with more than 40 years of experience. The results showed significant interest in allowing lobster tailing among active fishermen, while also identifying concerns related to enforcement, logistics, and potential market impacts.

The proposed change would support the long-term economic viability of the California spiny lobster fishery while maintaining responsible management of the resource. Any implementation of lobster tailing would include appropriate handling, landing, and/or reporting requirements to ensure that enforcement officers can continue to verify compliance with minimum size regulations. Further discussion and potential pilot testing could help refine a program that addresses these concerns while protecting resource sustainability and expanding economic opportunities within the fishery.

***Proposed Regulatory Language: Proposed amendment to Title 14, California Code of Regulations, Section 122 – Spiny Lobster***

**§122. Spiny Lobster**

**(x) Tailing of Lobster.**

Commercial fishermen holding a valid California spiny lobster permit may remove the tail from legally harvested lobster. All lobster must be in compliance with the minimum size limit at the time of harvest.

Lobster tails may be possessed, transported, processed, and sold provided that all applicable landing, reporting, and permit requirements established by the California Department of Fish and Wildlife are followed.

The removal of lobster tails shall not be used to circumvent minimum size limits, possession limits, or other fishery management regulations.



## SECTION II: Optional Information

5. **Date of Petition:** March 11<sup>th</sup> 2026
6. **Category of Proposed Change**  
 Sport Fishing  
 Commercial Fishing  
 Hunting  
 Other, please specify: [Click here to enter text.](#)
7. **The proposal is to:** *(To determine section number(s), see current year regulation booklet or <https://govt.westlaw.com/calregs>)*  
 Amend Title 14 Section(s): 122 – Spiny Lobster  
 Add New Title 14 Section(s): [Click here to enter text.](#)  
 Repeal Title 14 Section(s): [Click here to enter text.](#)
8. **If the proposal is related to a previously submitted petition that was rejected, specify the tracking number of the previously submitted petition** [Click here to enter text.](#)  
Or  Not applicable.
9. **Effective date:** If applicable, identify the desired effective date of the regulation.  
If the proposed change requires immediate implementation, explain the nature of the emergency: [First Wednesday of October 2026](#)
10. **Supporting documentation:** Identify and attach to the petition any information supporting the proposal including data, reports and other documents: [Click here to enter text.](#)
11. **Economic or Fiscal Impacts:** Identify any known impacts of the proposed regulation change on revenues to the California Department of Fish and Wildlife, individuals, businesses, jobs, other state agencies, local agencies, schools, or housing: [The proposed regulation allowing the option to tail California spiny lobster is not expected to result in significant negative economic impacts to the California Department of Fish and Wildlife, individuals, businesses, jobs, or other state or local agencies. The proposal does not alter harvest limits, season dates, or permit structures, and therefore is not expected to affect licensing revenue, landing taxes, or other revenues collected by the state. Providing the option to tail lobster may create economic benefits for commercial fishermen, processors, wholesalers, and restaurants by improving storage efficiency, reducing shipping constraints, and allowing access to additional markets that prefer frozen lobster tails rather than live product. These efficiencies could help reduce waste and mitigate economic volatility associated with market disruptions or export limitations. Overall, the proposed change is expected to have neutral to positive economic effects while maintaining current fishery management objectives.](#)
12. **Forms:** If applicable, list any forms to be created, amended or repealed:  
[Click here to enter text.](#)



**SECTION 3: FGC Staff Only**

Date received: 03/12/2026

FGC staff action:

- Accept - complete
- Reject - incomplete
- Reject - outside scope of FGC authority

Tracking Number

Date petitioner was notified of receipt of petition and pending action: \_\_\_\_\_

Meeting date for FGC consideration: \_\_\_\_\_

FGC action:

- Denied by FGC
- Denied - same as petition \_\_\_\_\_
- Granted for consideration of regulation change

Tracking Number



Tracking Number: ( 2026-03 )

To request a change to regulations under the authority of the California Fish and Game Commission (Commission), you are required to submit this completed form to: California Fish and Game Commission, (physical address) 1416 Ninth Street, Suite 1320, Sacramento, CA 95814, (mailing address) P.O. Box 944209, Sacramento, CA 94244-2090 or via email to FGC@fgc.ca.gov. Note: This form is not intended for listing petitions for threatened or endangered species (see Section 670.1 of Title 14).

Incomplete forms will not be accepted. A petition is incomplete if it is not submitted on this form or fails to contain necessary information in each of the required categories listed on this form (Section I). A petition will be rejected if it does not pertain to issues under the Commission’s authority. A petition may be denied if any petition requesting a functionally equivalent regulation change was considered within the previous 12 months and no information or data is being submitted beyond what was previously submitted. If you need help with this form, please contact Commission staff at (916) 653-4899 or FGC@fgc.ca.gov.

**SECTION I: Required Information.**

*Please be succinct. Responses for Section I should not exceed five pages*

**1. Person or organization requesting the change (Required)**

Name of primary contact person: Shawn Kelly

Address: [REDACTED]

Telephone number: [REDACTED]

Email address: [REDACTED]

**2. Rulemaking Authority (Required)** - Reference to the statutory or constitutional authority of the Commission to take the action requested: **The Fish and Game commission amended Title 14 Section 28.15 four times since 1994 citing Authority under: Sections 110, 200, 205, 265 and 275, Fish and Game Code. Certificate of Compliance became effective 6-20-2024 pursuant to Government Code section 11343.4(b)(3) (Register 2024, No. 25).**

**3. Overview (Required)** - Summarize the proposed changes to regulations: **The commission needs to reinstate the three fish limit back to recreational fishermen who have had reduced access by 33% over the last 3 years. The Commission must then adopt regulations that limit “Open Access” commercial California halibut fishing permits and set a quota for said commercial industry so that we can avoid the problems faced by the California salmon industry. Re-instating the 3 fish bag limit for recreational sport fishing will re-allocate the resource back to all Californians, not special interests. Recreational sportfishing has a much smaller impact upon the available resources. If the Commission does not adopt these changes, the California halibut resource sustainability is in jeopardy.**

**4. Rationale (Required)** - Describe the problem and the reason for the proposed change: **Three years ago, an “Emergency Action” was taken by the California Fish and Game Commission to reduce recreational California halibut limit from 3 fish bag limit per day to two fish bag limits in waters north of a line extending due west magnetic from Point Sur, Monterey County. The intent of this change was to protect the halibut fishery during the salmon closure. This action was then adopted as a permanent regulation February 14, 2024. During this “Emergency Closure” period**



no action was taken by the Commission to reduce the commercial take of California halibut. The Commission did not limit /curtail open access commercial permits during this period. The fact is the Commission took no action to protect the halibut fishery; the resource was simply re-allocated to the commercial community. In the “Findings of Emergency and Statement of Proposed Emergency Regulatory Action” report the author states “Halibut sustainability is threatened by a potential shift in commercial fishing efforts. Displaced commercial salmon fishermen may participate in the open access commercial hook and line halibut fishery, which will increase effort and ultimately take.” If the Commission does not adopt these changes, the California halibut resource sustainability is in jeopardy. In 2008 -2009 the halibut resource suffered substantially for five years 2011-2016, let’s not let this happen again. Commercial rock fishing and salmon seasons have been reinstated for 2026. Commercial effort can now go back to their initial commercial efforts and recreational sportsmen will be made whole.

## SECTION II: Optional Information

5. **Date of Petition:** 3/25/2026
6. **Category of Proposed Change**
  - Sport Fishing
  - Commercial Fishing
  - Hunting
  - Other, please specify:
7. **The proposal is to:** *(To determine section number(s), see current year regulation booklet or <https://govt.westlaw.com/calregs>)*
  - Amend Title 14 Section(s):
  - Add New Title 14 Section(s):
  - Repeal Title 14 Section(s):
8. **If the proposal is related to a previously submitted petition that was rejected, specify the tracking number of the previously submitted petition**   
Or  Not applicable.
9. **Effective date:** If applicable, identify the desired effective date of the regulation.  
If the proposed change requires immediate implementation, explain the nature of the emergency:
10. **Supporting documentation:** Identify and attach to the petition any information supporting the proposal including data, reports and other documents:
11. **Economic or Fiscal Impacts:** Identify any known impacts of the proposed regulation change on revenues to the California Department of Fish and Wildlife, individuals, businesses, jobs, other state agencies, local agencies, schools, or housing:
12. **Forms:** If applicable, list any forms to be created, amended or repealed:



[Click here to enter text.]

**SECTION 3: FGC Staff Only**

Date received: | 03/23/2026 |

FGC staff action:

- Accept - complete
- Reject - incomplete
- Reject - outside scope of FGC authority

Tracking Number

Date petitioner was notified of receipt of petition and pending action: \_\_\_\_\_ |

Meeting date for FGC consideration: \_\_\_\_\_ |

FGC action:

- Denied by FGC
- Denied - same as petition \_\_\_\_\_ |
- Granted for consideration of regulation change

Tracking Number

**California Fish and Game Commission**  
Agenda Item 5C, Regulation Change Petitions (Marine)  
Referred MPA Petitions

**Exhibit C.1. Summary Table of Comments on Referred MPA Petitions,  
and Copies of Individual Comments (exhibits C2-C33),  
Received between March 22 and April 2, 2026**

**Index of Exhibits Listed in Summary Table**

Comments summarized in Table for Exhibit 5C.1 for Item 5 Regulation Change Petitions (Marine) are listed and linked in this index, followed by the summary table,

Exhibit 5C.1 - [Summary table of comments on referred MPA petitions](#)

**Exhibits of Comments Summarized in Comments Table and Included in This Exhibit**

- 5C.2. [Letter from Ryder and Fisher Devoe](#), received February 19, 2026
- 5C.3. [Email from Tim Athens, F/V Outer Banks](#), received February 11, 2026
- 5C.4. [Michael Rescino, President, Golden Gate Fishermen's Association](#), received April 2, 2026
- 5C.5. [Letter from Merrill Anderson, Village Laguna](#), received March 30, 2026
- 5C.6. [Email from Katie Cahill, General Manager, Hotel Joaquin](#), received February 15, 2026
- 5C.7. [Email from Mike Beanan, Laguna Bluebelt Coalition](#), received March 13, 2026
- 5C.8. [Letter from Chugey Sepulveda, Pflieger Institute of Environmental Research](#), received February 27, 2026
- 5C.9. [Joint letter from Commercial Fishermen of Santa Barbara \(CFSB\), Ventura County Commercial Fishermen's Association, and the California Lobster & Trap Fishermen's Association, transmitted by Kim Selkoe, CFSB](#), received February 24, 2026
- 5C.10. [Letter from John Steinbeck](#), received February 9, 2026
- 5C.11. [Letter from Land Trust for Santa Barbara County](#), received February 20, 2026
- 5C.12. [Email from Dan Robinette, Coastal Program Leader, Point Blue](#), received February 20, 2026
- 5C.13. [Email from Bill Woodbridge](#), received March 4, 2026
- 5C.14. [Email from Jennifer Bauer](#), received March 20, 2026
- 5C.15. [Email from Joanne Dean-Freemire](#), received March 19, 2026

- 5C.16. [Letter from Land Trust for Santa Barbara County](#), received February 20, 2026
- 5C.17. [Letter from Ava Schulenberg, Executive Director, California Lobster and Trap Fishermen's Association](#), received April 1, 2026
- 5C.18. [Letter from Chris Voss, President, and Kim Selkoe, Executive Director, Commercial Fishermen of Santa Barbara](#), received February 24, 2026
- 5C.19. [Email from Ethan Olsen](#), received February 24, 2026
- 5C.20. [Letter from Colleen Hicks](#), received October 17, 2025
- 5C.21. [Email from Ashley Eagle-Gibbs, EAC \(Environmental Action Committee\) of West Marin](#), received February 11, 2026
- 5C.22. [Letter from Mark Jacobsen](#), received February 17, 2026
- 5C.23. [Letter from Save Duxbury Access](#), received February 23, 2026
- 5C.24. [Letter from SDA](#), received February 25, 2026
- 5C.25. [Letter from Chris Chamberlain, Marin County Parks](#), received February 17, 2026
- 5C.26. [Letter from Golden Gate Fisherman's Association](#), received February 26, 2026
- 5C.27. [Email from Pam Fabry](#), received March 30, 2026
- 5C.28. [Email from Meg Simonds](#), received March 31, 2026
- 5C.29. [Email from Pat Dickens](#), received March 31, 2026
- 5C.30. [Letter from Mollie Lunibos, Save Duxbury Access](#), received April 2, 2026
- 5C.31. [Email from Weston Borg](#), received April 2, 2026
- 5C.32. [Letter from Santa Cruz Port District](#), received March 25, 2026
- 5C.33. [Letter from Ed Parnell and Paul Dayton, Scripps Institution of Oceanography at University of California San Diego; Stephen Schroeter, Marine Science Institute at University of California Santa Barbara; and Peter Halmay, President, San Diego Fishermen's Working Group](#), received April 1, 2026

**Exhibits of Comments Summarized in Item 5 Comments Table but Included in [Item 2](#)**

- 2.14. Letter from Jaime, Jason, and Matthew Diamond, Stardust Sportfishing, received March 30, 2026
- 2.15. Letter from Ken Franke, President, Sportfishing Association of California, received March 30, 2026
- 2.20. Email from Katie O'Donnell, Senior Ocean Conservation Manager, WILDCOAST, transmitting a joint letter from 31 organizations and two individuals, received April 2, 2026
- 2.22. Letter from Marine Conservation Institute, received March 31, 2026
- 2.23. Email from Eric Praske, received March 31, 2026

- 2.24. Email from Keith Rootsart, Founder, Giant Giant Kelp Restoration, received April 2, 2026
- 2.25. Letter from Mike Beanan, Laguna Bluebelt Coalition, received April 2, 2026
- 2.26. Letter from Eryn Oelstrom, received April 1, 2026
- 2.27. Letter from Azsha Hudson, Marine Conservation Analyst, Environmental Defense Center, received April 1, 2026
- 2.28. Letter from Mollie Lounibos, Save Duxbury Access, received April 2, 2026
- 2.32. Sample email from Rick Gordon, Bolinas resident, received March 22, 2026

**California Fish and Game Commission  
Item 5. Regulation Change Petitions (Marine)  
(C) Comments on Referred MPA Petitions**

*(comments received from 12:01 p.m. on February 6, 2026 through 5:00 pm on April 2, 2026)\**

\*Comments received previous to public comment window but missed in previous meeting materials may also be included here.

Unless otherwise noted, "Department" refers to the California Department of Fish and Wildlife.

MPA - marine protected area SMR - state marine reserve SMCA - state marine conservation area MLPA - Marine Life Protection Act

MPA Petition Tracking No.	Support or Oppose	Entity/Individual	Date Received	Exhibit (Item.Number)	Description
2023-14MPA (14)	Support	Ryder and Fisher Devoe, San Diego and Ventura residents	February 19, 2026	5C.2	Two commercial/recreational fishermen support this petition, stating it is a clear step in helping to mitigate the spread of sea urchins to the benefit of rebuilding kelp.
14	Oppose	Joint letter from 31 organizations and two individuals, transmitted by Katie O'Donnell, WILDCOAST	April 2, 2026	2.20	A coalition of organizations and individuals urges the Commission to deny this petition, asserting that the proposed commercial urchin take allowances fail to address the underlying drivers of kelp decline, contradict the core mandates of the MLPA, and would weaken the integrity of the broader MPA network.
14	Oppose	Marine Conservation Institute	March 31, 2026	2.22	The Marine Conservation Institute recommends denying the petition as it would reduce the level of protection in areas that currently contribute to the ecological performance of California's MPA network. They contend that downgrading protections risks undermining biodiversity gains, weakening ecosystem resilience in the face of climate change, and compromising California's leadership in marine conservation.
2023-15MPA_AM (15)	Support	Tim Athens, F/V Outer Banks	February 11, 2026	5C.3	A commercial fisherman supports modifying regulations to allow take of highly migratory species in the three MPAs listed in Petition 2023-15MPA, arguing that doing so is scientifically sound, would not harm pelagic species, and would improve fishery efficiency while countering what the author views as unfounded claims against the change.
15	Support	Ryder and Fisher Devoe, San Diego and Ventura residents	February 19, 2026	5C.2	Two swordfish fishermen from San Diego/Ventura support this petition, stating that the current Channel Islands no-take areas are overly extensive and should be updated to allow pelagic fishing in a manner consistent with other MPAs across the rest of the state.
15	Oppose	Eric Praske	March 31, 2026	2.23	Two swordfish fishermen from San Diego/Ventura support this petition, stating that the current Channel Islands no-take areas are overly extensive and should be updated to allow pelagic fishing in a manner consistent with other MPAs across the rest of the state.
15	Oppose	Joint letter from 31 organizations and two individuals, transmitted by Katie O'Donnell, WILDCOAST	April 2, 2026	2.20	A coalition of organizations and individuals urge the Commission to deny this petition, contending that it conflicts with the goals of the original Marine Reserves Working Group (MRWG) that supported the Channel Islands MPA designation process in 2003, as well as the goals of the MLPA. They add that the petition would undermine ecosystem protections for highly migratory species and create enforcement challenges.
15	Oppose	Marine Conservation Institute	March 31, 2026	2.22	The Marine Conservation Institute recommends denying the petition for the same reasons provided for Petition 2023-14.
2023-16MPA (16)	Oppose	Eric Praske	March 31, 2026	2.23	A Laguna Beach resident urges the Commission to deny this petition as it is inconsistent with the petition guiding principles, fails to advance DMR recommendations, hinders 30x30 progress, and complicates enforcement.

MPA Petition Tracking No.	Support or Oppose	Entity/Individual	Date Received	Exhibit (Item.Number)	Description
16	Oppose	Joint letter from 31 organizations and two individuals, transmitted by Katie O'Donnell, WILD Coast	April 2, 2026	2.20	A coalition of organizations and individuals urge the Commission to deny this petition, asserting that it conflicts with key MLPA goals, raises significant scientific concerns, and, according to CDFW, does not align with adaptive management guidance from the DMR.
16	Oppose	Marine Conservation Institute	March 31, 2026	2.22	The Marine Conservation Institute recommends denying the petition for the same reasons provided for Petition 2023-14.
18	Oppose	Joint letter from 31 organizations and two individuals, transmitted by Katie O'Donnell, WILD Coast	April 2, 2026	2.20	A coalition of organizations and individuals urge the Commission to deny this petition, contending that it is inconsistent with the goals of the original Marine Reserves Working Group that supported the Channel Islands MPA designation process in 2003, and lacks scientific justification for removing protections for seabirds and pinnipeds.
2023-18MPA	Oppose	Marine Conservation Institute	March 31, 2026	2.22	The Marine Conservation Institute recommends denying the petition for the same reasons provided for Petition 2023-14.
2023-19MPA (19)	Support	Marine Conservation Institute	March 31, 2026	2.22	The Marine Conservation Institute supports the petition as it will modestly strengthen the network and advance the state's goal of protecting 30% of nature by 2030.
19	Oppose	Michael Rescino, President, Golden Gate Fishermen's Association	April 2, 2026	5C.4	The Golden Gate Fishermen's Association opposes the proposed Tribal MPA expansions and regulatory changes along the Central Coast as it would further restrict limited fishing grounds and have a harmful economic impact on the fishing fleet and coastal communities.
2023-20MPA	Support	Marine Conservation Institute	March 31, 2026	2.22	The Marine Conservation Institute supports the petition as it will modestly strengthen the network and advance the state's goal of protecting 30% of nature by 2030.
2023-21MPA	Support	Marine Conservation Institute	March 31, 2026	2.22	The Marine Conservation Institute supports the petition as it will modestly strengthen the network and advance the state's goal of protecting 30% of nature by 2030.
2023-23MPA_AM	Support	Keith Rootsart, Giant Kelp Restoration Project	April 2, 2026	2.24	The petitioner for 2023-23MPA supports the petition, disputing the Department's evaluation assertions, criticizing barriers to kelp restoration permitting and management within MPAs, and urging more supportive, adaptive, and collaborative approaches to restoration efforts.
2023-24MPA_AM (24)	Support	Merrill Anderson, Village Laguna	March 30, 2026	5C.5	The Board of Directors of Village Laguna supports the Laguna Blue Belt's revision to the southern boundary for Petition 2023-24 as it would add 1.3 miles of essential seal life habitat.
24	Support	Katie Cahill, General Manager, Hotel Joaquin	February 15, 2026	5C.6	Hotel Joaquin supports the Laguna Bluebelt MPA Petition as it would ensure that all of Laguna Beach's coast would remain a sanctuary, and provide economic benefits of the city-wide fully protected MPA.
24	Support	Mike Beanan, Laguna Bluebelt Coalition	March 13, 2026	5C.7	The petitioner, on behalf of Laguna Bluebelt Coalition, shares a story from Stu News Laguna to defend support for the petition. The story highlights a study finding that Laguna Beach SMR has stable kelp densities and currently has higher giant kelp densities than the unprotected ecosystems surveyed at the Thousand Steps Beach and Three Arch Bay, in the area proposed for enhanced protection.
24	Oppose	Ryder and Fisher Devoe, San Diego and Ventura residents	February 19, 2026	5C.2	Two commercial/recreational fishermen from San Diego/Ventura oppose this petition, stating it would impose unnecessary additional closures in an area already dense with MPAs and asserting that concerns about enforcement are misplaced because state wardens, not city officials, are responsible for MPA compliance.

MPA Petition Tracking No.	Support or Oppose	Entity/Individual	Date Received	Exhibit (Item.Number)	Description
24	Oppose	Chugey Sepulveda, Pflieger Institute of Environmental Research	February 27, 2026	5C.8	Pflieger Institute of Environmental Research argues that the proposed southward expansion of the Laguna Beach MPA should not be approved until scientific evidence addresses the influence of the Aliso Creek Ocean Outfall and the socioeconomic impacts on local fishing communities.
24	Oppose	Jaime, Jason, and Matthew Diamond, Stardust Sportfishing	March 30, 2026	2.14	The Diamonds recommend denying the petition, as the proposed closure area is an important access point for their operations. Their fleet out of Dana Point Harbor regularly takes members of the public - including underserved youth, disabled veterans and others that are on limited time schedules or mobility challenged - to experience recreational fishing.
24	Oppose	Ken Franke, President, Sportfish Association of California	March 30, 2026	2.15	The Sportfish Association of California recommends denying the petition, asserting that the change would not achieve the stated objectives of the petition (to ease enforcement, enhance protections for kelp or whales).
24	Support	Eryn Oelstrom	April 1, 2026	2.26	An engaged citizen urges the Commission to support expanding the Laguna Beach No-Take SMCA, citing scientific evidence of strong kelp forest health, low recreational fishing use, ecological risks from commercial fishing, and the benefits of larger protected areas in response to the Department's evaluation.
24	Support	Mike Beanan, Laguna Bluebelt Coalition	April 2, 2026	2.25	Laguna Bluebelt Coalition, petitioner of 2023-24MPA, supports this petition and argues the Department's evaluation contains significant errors and outdated or misconstrued data, and urges the Commission to recognize scientific evidence showing ecological benefits of expanding the Laguna Beach No-Take SMCA.
<b>2023-27MPA_AM (27)</b>	Support	Marine Conservation Institute	March 31, 2026	2.22	The Marine Conservation Institute supports the petition as it will modestly strengthen the network and advance the state's goal of protecting 30% of nature by 2030.
27	Support	Azsha Hudson, Marine Conservation Analyst, Environmental Defense Center	April 1, 2026	2.27	Environmental Defense Center, the petitioner, supports this petition and argues that the Department's recommendation ignores the hyper local science of Anacapa Island that lobster traps in the Anacapa Island SMCA are severely damaging eelgrass habitat, contrasting this with thriving eelgrass in the adjacent SMR, and arguing that updated protections are needed to meet longstanding ecological and adaptive management goals.
27	Oppose	The Commercial Fishermen of Santa Barbara, Ventura County Commercial Fishermen's Association, and the California Lobster & Trap Fishermen's Association	February 24, 2026	5C.9	The Commercial Fishermen of Santa Barbara, Ventura County Commercial Fishermen's Association, and the California Lobster & Trap Fishermen's Association oppose Petition 2023-27MPA, arguing that the proposed eelgrass-protection closures at Anacapa Island misuse the MPA process, lack stakeholder engagement and socioeconomic analysis, and should instead be addressed through adaptive fishery management.
27	Oppose	Jaime, Jason, and Matthew Diamond, Stardust Sportfishing	March 30, 2026	2.14	The Diamonds recommend denying the petition, sharing that members of their fleet fish within the SMCA and require anchoring access to fish there.
27	Oppose	Ken Franke, President, Sportfish Association of California	March 30, 2026	2.15	The Sportfish Association of California recommends denying the petition, contending that there is insufficient evidence that anchoring, as currently allowed, is having an enduring negative impact on seagrass beds in the area. Members of their fleet rely on anchoring in the area in order to fish.
<b>2023-28MPA_AM (28)</b>	Support	John Steinbeck	February 9, 2026	5C.10	A retired marine biologist provides support for the petition to help protect and restore ocean health, enhance coastal recreation experiences, and support the coastal economy in Santa Barbara.

MPA Petition Tracking No.	Support or Oppose	Entity/Individual	Date Received	Exhibit (Item.Number)	Description
28	Support	Land Trust for Santa Barbara County	February 20, 2026	5C.11	The Land Trust for Santa Barbara County supports this petition and the associated benefits for coastal ecosystems, cultural resources, and Chumash heritage.
28	Support	Dan Robinette, Coastal Program Leader, Point Blue Conservation	February 20, 2026	5C.12	Point Blue Conservation Science supports the petition citing biological information that indicates the proposed SMCA resides in an area of high biological importance.
28	Support	Bill Woodbridge	March 4, 2026	5C.13	A Santa Barbara resident supports the petition citing it will help protect and restore ocean health, enhance coastal recreation experiences, and support the costal economy in Santa Barbara.
28	Support	Jennifer Bauer	March 20, 2026	5C.14	A San Luis Obispo resident supports the petition given the rich biodiversity of the area and the cultural significance to the Chumash people.
28	Support	Marine Conservation Institute	March 31, 2026	2.22	The Marine Conservation Institute supports the petition as it will modestly strengthen the network and advance the state's goal of protecting 30% of nature by 2030.
28	Support	Joanne Dean-Freemire	March 19, 2026	5C.15	A California resident supports the petition as MPAs produce more fish for fishermen in unprotected areas.
28	Oppose	Michael Rescino, President, Golden Gate Fishermen's Association	April 2, 2026	5C.4	The Golden Gate Fishermen's Association opposes the proposed Tribal MPA expansions and regulatory changes along the Central Coast as it would further restrict limited fishing grounds and have a harmful economic impact on the fishing fleet and coastal communities.
<b>2023-29MPA_AM (29)</b>	Support	Land Trust for Santa Barbara County	February 20, 2026	5C.16	The Land Trust for Santa Barbara County supports the petition and the associated benefits for coastal ecosystems, cultural resources, and Chumash heritage.
29	Support	Bill Woodbridge	March 4, 2026	5C.13	A Santa Barbara resident supports the petition citing it will help protect and restore ocean health, enhance coastal recreation experiences, and support the costal economy in Santa Barbara.
29	Support	Marine Conservation Institute	March 31, 2026	2.22	The Marine Conservation Institute supports the petition as it will modestly strengthen the network and advance the state's goal of protecting 30% of nature by 2030.
29	Support	Ava Schulenberg, Executive Director, California Lobster & Trap Fishermen's Association	April 1, 2026	5C.17	The California Lobster and Trap Fishermen's Association opposes the petition citing lack of ecological justification but supports Tribal co-management in principle.
29	Oppose	Ryder and Fisher Devoe, San Diego and Ventura residents	February 19, 2026	5C.2	Two commercial/recreational fishermen from San Diego/Ventura oppose the petition as it would close the only remaining coast reef available for fishing and would eliminate calico bass fishing on the coast.
29	Oppose	Chris Voss, President, Kim Selkoe, Executive Director, Commercial Fishermen of Santa Barbara	February 24, 2026	5C.18	The Commercial Fishermen of Santa Barbara oppose this peition as they find the scientific rationale and analysis of the Commission's Coastal Fishing Communities Policy for the petition to be insufficient.
29	Oppose	Ethan Olsen	February 24, 2026	5C.19	A fisherman voices opposition to the petition and urges consideration of balanced, data-driven management that protects marine resources while preserving public access for responsible fishermen.
29	Oppose	Jaime, Jason, and Matthew Diamond, Stardust Sportfishing	March 30, 2026	2.14	The Diamonds recommend denying the petition as it will create undue burden on a region already heavily impacted by MPA fisheries closures.
29	Oppose	Ken Franke, President, Sportfish Association of California	March 30, 2026	2.15	The Sportfish Association of California recommends denying the petition, contending that it will create undue burden on a region already heavily impacted by MPA fisheries closures.
<b>2023-32MPA (32)</b>	Support	Colleen Hicks	October 17, 2025	5C.20	A Bolinas resident expresses support for the petition and rescinds previously-stated support for a non-regulatory alternative.

MPA Petition Tracking No.	Support or Oppose	Entity/Individual	Date Received	Exhibit (Item Number)	Description
32	Support	Ashley-Eagle-Gibbs, Environmental Action Committee of West Marin (EAC)	February 11, 2026	5C.21	Petitioner advocates for the petition, citing amendments made due to stakeholder engagement, consistency with MLPA and MPA network guidelines, and preliminary analyses showing their proposal will strengthen California's MPA network.
32	Support	Ashley-Eagle-Gibbs, EAC	February 11, 2026	5C.21	Petitioner draws attention to previous comments submitted in writing on February 6 in support of their petition, expressing support for strengthening California's MPA network and requesting that the Commission deny all petitions that propose to weaken the network.
32	Support	Marine Conservation Institute	March 31, 2026	2.22	The Marine Conservation Institute supports the petition as it will modestly strengthen the network and advance the state's goal of protecting 30% of nature by 2030.
32	Oppose	Ken Franke, President, Sportfish Association of California	March 30, 2026	2.15	The Sportfish Association of California (SAC) recommends denying all proposed new restrictions to take and seaward boundary expansions. They align themselves with the position of Golden Gate Fisherman's Association, which is a SAC affiliate member.
32	Oppose	Mark Jacobsen	February 17, 2026	5C.22	A Bolinas resident opposes further restrictions on fishing at Duxbury Reef, stating that shore based fishing is already restricted and is not as impactful as offshore fishing by large vessels.
32	Oppose	Save Duxbury Access	February 23, 2026	5C.23	An organization formed in response to petition 2023-32MPA requests that the Commission deny Petition 2023-32MPA as insufficient according to regulations pertaining to petitions for regulatory change and remove it from further Commission consideration.
32	Oppose	Save Duxbury Access	February 25, 2026	5C.24	An organization formed in response to petition 2023-32MPA states that expanding or redesignating Duxbury Reef SMCA is unsupported by existing data and administrative records, presents an alternative "adaptive management" approach to Duxbury Reef, and requests Commission recognition of the insufficiencies identified in Petition 2023-32MPA and Commission denial of the petition.
32	Oppose	Chris Chamberlain, Marin County Parks	February 25, 2026	5C.25	Rescinds Marin County Parks' previously expressed support, stating that they have learned community support for Petition 2023-32MPA was not as broad as they originally believed. Requests that the Commission deny the petition in favor of a community-based process to explore necessary changes to Duxbury Reef.
32	Oppose	Golden Gate Fishermans Association	February 26, 2026	5C.26	Opposes Petition 2023-32MPA as unnecessary given the conservation accomplishments of the existing MPA network and regulatory restrictions, and expresses concern that the petition does not adequately contemplate socioeconomic externalities for fishing communities and businesses.
32	Oppose	Rick Gordon	March 22, 2026	2.32	A Bolinas resident opposes Petition 2023-32MPA and supports the Save Duxbury Access alternative plan, urging the Commission to maintain the current Duxbury Reef SMCA as recommended by the Department, maintain the current SMCA boundaries, and ensure that the Save Duxbury Access alternative petition and adaptive management framework are formally included in the record.
32	Oppose	Pam Fabry	March 30, 2026	5C.27	A Bolinas resident opposes Petition 2023-32MPA and supports an alternative proposal put forth by Save Duxbury Access, stating that current allowable activities in Duxbury Reef are important for community and subsistence use.
32	Oppose	Meg Simonds	March 31, 2026	5C.28	A Bolinas resident supports the Department's recommendation regarding Petition 2023-32MPA to not redesignate Duxbury Reef as a SMR.

MPA Petition Tracking No.	Support or Oppose	Entity/Individual	Date Received	Exhibit (Item.Number)	Description
32	Oppose	Pat Dickens	March 31, 2026	5C.29	A Bolinas resident supports existing regulations at Duxbury Reef and requests that the Commission receive Save Duxbury Access's alternative proposal for its administrative record.
32	Oppose	Save Duxbury Access	April 2, 2026	5C.30	An organization formed in response to petition 2023-32MPA asserts that it should be denied and removed because it lacked the site-specific scientific, enforcement, fisheries, socioeconomic, adaptive-management, and community-process information required under 14 CCR § 662(d)(1), forcing CDFW to heavily supplement the record.
32	Oppose	Mollie Lounibos, Save Duxbury Access	April 2, 2026	2.28	Save Duxbury Access supports the Department's recommendation regarding the SMR reclassification but opposes the overall petition and urges the Commission to uphold the current Duxbury Reef SMCA boundaries and deny proposed expansions, arguing that the Department applied its evidentiary standards inconsistently, lacked site-specific justification for boundary growth, and overlooked significant access, equity, and community-stewardship concerns.
32	Oppose	Western Borg	April 2, 2026	5C.31	A Bolinas resident opposes Petition 2023-32MPA and supports the Save Duxbury Access alternative plan, urging the Commission to maintain current Duxbury Reef SMCA rules, preserve local access for fishing and gathering, and formally include the community-based adaptive management framework in the record.
32	Oppose	Jaime, Jason, and Matthew Diamond, Stardust Sportfishing	March 30, 2026	2.14	The Diamonds recommend denying all proposed new restrictions to take and seaward boundary expansions. They advocate for allowing the public to continue to have access to fish from shore, as shorefishing is an important first introduction point to fishing for their clients.
2023-33MPA_AM (33)	Oppose	Ryder and Fisher Devoe, San Diego and Ventura residents	February 19, 2026	5C.2	Two commercial/recreational fishermen from San Diego/Ventura oppose this petition, stating that expanding MPAs will not improve kelp forests, given that kelp growth is driven by ocean conditions rather than fishing, and noting that MPAs are intended for ecosystem protection, not kelp restoration.
33	Oppose	Chris Voss, President, Kim Selkoe, Executive Director, Commercial Fishermen of Santa Barbara	February 24, 2026	5C.18	The Commercial Fishermen of Santa Barbara opposes this petition because they cannot support the proposed closure of fishing grounds, citing three primary concerns: The scientific rationale provided for the closures is weak, the proposed MPAs could undermine more effective restoration strategies, and the economic harm to fishing communities would be substantial.
33	Oppose	Santa Cruz Port District	March 25, 2026	5C.32	The Santa Cruz Port District opposes Petition 2023-33MPA, arguing that the proposed new and expanded SMRs lack regionally specific science, ignore socioeconomic impacts and stakeholder input, and would unduly eliminate nearby fishing opportunities.
33	Oppose	Ken Franke, President, Sportfish Association of California	March 30, 2026	2.15	The Sportfish Association of California recommends denying the petition, contending that the proposed closures disproportionately cost public access from Santa Barbara and Santa Cruz harbors where there are already decreased degrees of access.
33	Oppose	Jaime, Jason, and Matthew Diamond, Stardust Sportfishing	March 30, 2026	2.14	The Diamonds recommend denying the petition, stating that the targeted habitat type is already over-represented within our MPA network, making the proposed actions out of line with the guidance provided for adaptive management measures to be considered by the Commission.

MPA Petition Tracking No.	Support or Oppose	Entity/Individual	Date Received	Exhibit (Item.Number)	Description
33	Oppose	Ed Parnell and Paul Dayton, Scripps Institution of Oceanography at University of California San Diego; Stephen Schroeter, Marine Science Institute at University of California Santa Barbara, Peter Halmay, President, San Diego Fishermen's Working Group	April 1, 2026	5C.33	A group of researchers and the San Diego Fishermen's Working Group argue that a proposed expansion of the Cabrillo State Marine Reserve is unjustified because long-term data from the Point Loma kelp forest do not support claims that fishing-driven trophic cascades are causing kelp decline, and the expansion would heavily restrict urchin harvesting and harm the local fishery.
<b>2023-34MPA (34)</b>	Support	Marine Conservation Institute	March 31, 2026	2.22	The Marine Conservation Institute supports the petition as it will modestly strengthen the network and advance the state's goal of protecting 30% of nature by 2030.
34	Oppose	Ryder and Fisher Devoe, San Diego and Ventura residents	February 19, 2026	5C.2	Two commercial/recreational fishermen from San Diego/Ventura oppose this petition, stating that additional restrictions on pelagic finfish are unwarranted because these species are minimally benefitted by MPAs, and contending that enforcement concerns are unfounded.
34	Oppose	Jaime, Jason, and Matthew Diamond, Stardust Sportfishing	March 30, 2026	2.14	The Diamonds recommend denying the petition, as Farnsworth is an important site for anglers to target big-game fish. They share that the take allowances at Farnsworth provide important public access to mobile species which largely do not benefit from spatially-based protections.
34	Oppose	Ken Franke, President, Sportfish Association of California	March 30, 2026	2.15	The Sportfish Association of California recommends denying the petition. They share that Farnsworth Bank is very important for access by partyboats from Santa Monica Bay, Los Angeles, Long Beach, Newport Bay and Dana Point Harbor to target squid, bonito, yellowtail, white sea bass and other species.
34	Oppose	James McNair, Golden Gate Fishermen's Association	April 2, 2026	5C.4	The Golden Gate Fishermen's Association opposes the proposed tribal MPA expansions and regulatory changes along the central California coast as it would further restrict limited fishing grounds and have a harmful economic impact on the fishing fleet and coastal communities.

Hello FGC,

Our names are Ryder and Fisher Devoe. We live in both San Diego and Ventura and have been on the water around both areas participating recreationally and part-time commercially over the last 20 years in hook-and-line and free dive fisheries.

Our comment concerns the following MPA Petitions:

Petition 2023-34MPA: No Support

Petition 34 calls to close or further restrict two areas access to pelagic finfish. It is well known these species are less affected by MPAs and they should still be able to be targeted. We have areas that allow this all over the coast so calling these two areas "special" and have enforcement concerns justifying their closure is just an excuse to take more away. If enforcement does ok with all the limited take areas as they say, then there is nothing to be worried about.

Petition2023-33MPA: No Support

Petition 33 claims by expanding MPAs and closing down fishing access we will help regrow the kelp forests. How does fishing affect kelp growth in any way? Kelp growth and kelp breaking off is totally driven swell and water temperature. If you have no swell and water in the 60s kelp will thrive, but you get a major swell and water into the low 70s kelp will all break off its anchors and float away. Plain and simple, fishing does not affect kelp. Additionally, MPAs are made for biodiversity and ecosystems, they are not for kelp rebuilding, we have other projects for that. There appears to be several articles already out about the issues specifically with his petitions and those similar to it concerning kelp or eelgrass (petitions 24 and 27).

Petition2023-29MPA: No Support

Carpinteria reef is literally the only remaining coast reef remaining outside of MPAs between Point Conception and Point Mugu. Closing this area would effectively stop all calico bass fishing on the coast which is mainly catch and release. The petition claims the nearest MPAs are over 63 nautical miles apart (72 miles) which exceeds the 62-mile limit. Simply measuring the distance on maps shows the nearest MPAs, Campus Point and Pt. Dume are 61 miles apart and fall within the limit. This basic measurement displays the truth of this proposal, it's simply trying to take more away on top of what already was over 10 years ago. The petition also claims to be helping the White Sharks, we have already protected white sharks, and a great white will not be affected at all by a box as small as the proposal suggests due to how vast of an area they cover. Pelagic species are not affected by MPAs, especially Great Whites that travel so much.

Petition2023-24MPA: No Support

This petition is essentially another version of petition 33 trying to close more area for kelp forests that fishing has no effect on. The surrounding area is already saturated with MPAs in the local 4 MPA cluster, this expansion would just close even more off locally. The same

counter arguments for this petition apply from petition 33. Any argument for better enforcement for city limits is incorrect as city officials do not police the MPAs state wardens do and they are bound to no cities.

#### Petition2023-15MPA: Support

We fully support this proposed change. Participating on a smaller vessel in the swordfish fishery this petition really matters to us. The Channel Islands are significantly oversaturated with no-take areas that extend further offshore than anywhere else in the state. Pelagic fish or highly migratory species do not have the same effect on them or the surrounding area that local species do. The apparent Master Plan highlights this and calls to have areas open to these pelagic species but we do not see them anywhere relevant around the islands. The Channel Islands MPAs came before the rest of the network so it is understandable we were over cautious and implemented so many no-take areas but now that we know and have so many pelagic allowed area elsewhere, we need to update the Channel Islands to what we see in the rest of the state, a reasonable model where no-take areas are balanced with some pelagic allowed areas where they can be targeted offshore.

#### Petition2023-14MPA: Support

If we are trying to rebuild kelp anywhere this petition is a great starting point. Besides water temperature and swell, urchins contribute the most to wiping out entire forests of kelp. Allowing urchin access in there areas where it is restricted is a clear step in helping to mitigate the spread or sea urchins and the allow kelp the chance to grow inside these areas again where otherwise urchins would continue to eat all of it.

Thank you,

Ryder Devoe and Fisher Devoe

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**Petition 2023-15MPA-AM2**

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**From** neptuneobs [REDACTED]  
**Date** Wed 02/11/2026 12:53 PM  
**To** FGC <FGC@fgc.ca.gov>  
**Cc** blakestor2000 [REDACTED]

Dear President Zavaleta and Commissioners,

I am writing this letter in support of the modification of regulations to allow take of HMS species in the three MPA's cited in Petition 2023-15MPA-AM2. This petition is awash with sound science and common sense. Whether or not pelagic species are taken in these MPA's, no deleterious effect on their populations will be a result. All of our west coast HMS fisheries are healthy and managed sustainably with existing management measures. What will happen is improve the efficacy of existing fisheries, help in promoting new experimental gear types that show great promise as a way to reduce bycatch and smooth out enforcement issues caused by the current prohibition of HMS take in the three MPA's.

It is my greatest hope that this Commission can see through all the exaggerated and unsubstantiated claims of collapse and doom if these MPA regulations were modified. The recreational and commercial fishing industry here in California want nothing but healthy sustainable fisheries for the future. Shutting down the take of species that are open ocean crossers in small arbitrary boxes is not management but virtue signaling.

Thank you for your thoughtful consideration,  
Tim Athens  
FV Outer Banks



## **GOLDEN GATE FISHERMANS ASSOCIATION**

Dear Commissioners,

On behalf of the Golden Gate Fishermen's Association (GGFA), I write to express our strong opposition to proposed Tribal Marine Protected Area (MPA) expansions and additional fishing restrictions in the Morro Bay region, specifically Tribal MPA Petition 2023-19 (proposing a new MPA near Morro Bay), 2023-28MPA-AM (proposing a new MPA near Point Sal), and 2023-34MPA (proposing the reclassification of Point Buchon SMCA and modification of regulations within the Farnsworth MPA).

The Golden Gate Fishermen's Association represents the Commercial Passenger Fishing Vessel (CPFV) fleet from Morro Bay to the Oregon–California border. Our members rely on access to California's coastal waters to sustainably harvest species such as rockfish, salmon, halibut, and Dungeness crab. Any further reduction in available fishing grounds directly impacts the ability of our fleet to operate and remain economically viable.

While we respect the importance of cultural resources and recognize the role that Tribal communities play in the stewardship of marine ecosystems, we are deeply concerned that additional MPA designations or regulatory changes—particularly in already constrained areas like Morro Bay and along the Central Coast—will further limit access to critical fishing grounds. Over the past several years, our fleet has already endured significant regulatory restrictions, seasonal closures, and shifting management measures across multiple fisheries.

At a time when many of our members are still recovering from consecutive salmon closures and increasingly restrictive groundfish regulations, the addition of new spatial closures or further regulatory modifications will only compound the challenges facing our fleet. The proposals identified in Petition 2023-19, 2023-28MPA-AM, and 2023-34MPA represent not just isolated actions, but part of a broader trend of increasing spatial and regulatory constraints that collectively reduce viable fishing opportunities.

Each loss of fishing access reduces opportunity, increases pressure on remaining open areas, and threatens the long-term sustainability of small businesses that depend on these fisheries.

These proposed actions risk setting a precedent for continued expansion of restrictions without fully accounting for cumulative impacts to the fishing industry.

The impacts extend far beyond the vessels themselves. Harbors, fuel docks, tackle shops, processors, restaurants, and coastal tourism economies all rely on a functioning and accessible fishing fleet. When access is restricted, the economic ripple effect is felt throughout entire coastal communities.

GGFA strongly believes that any new management measures should prioritize balanced, science-based approaches that consider both conservation goals and the socioeconomic realities of working waterfronts. We urge the Commission to carefully evaluate the cumulative impacts of Petition 2023-19, 2023-28MPA-AM, and 2023-34MPA, and to avoid further restricting access to already limited fishing grounds.

We respectfully request that the Commission oppose or reconsider these proposed Tribal MPA expansions and regulatory changes in the Morro Bay, Point Sal, and Point Buchon regions that would further limit fishing access.

Thank you for your time and consideration of our concerns, and for your continued work on behalf of California's marine resources and coastal communities.

**Sincerely,**

**Michael Rescino**  
**President**  
**Golden Gate Fishermen's Association**



*Preserve and Enhance Laguna Beach's Unique Village Character*

March 30, 2026

Fish and Game Commission, State of California.

ATTN: Melisa Miller-Hensen, Executive Director and

Commissioners Samantha Murray, Erica Zavaleta, Jacque Holster-Carmesin, Eric Sklar and Darius Anderson.

PO Box 944209.

Sacramento, CA 94244-2090.

Via Mail and Email: [fgc@fgc.ca.gov](mailto:fgc@fgc.ca.gov)

**RE: Extension of the MPA along the southern coast of Laguna Beach**

Dear Commissioners,

The Board of Directors of Village Laguna joins with other local environmental groups in support of the Laguna Blue Belt's revision to the southern boundary for Petition 2023-24-R MPA to a no-take SMCA (State Marine Conservation Area) for citywide enforcement and protection of essential sea life between Palos Verdes and La Jolla MPAs.

The purpose of the Blue Belt petition is to simplify the no take regulation for the entire city of Laguna Beach, address inaccurate site names, and restore Laguna Beach as the correct authority for this area.

Extending the revised MPA boundary will add 1.3 miles of essential sea life habitat, including offshore kelp reefs. The extension will enhance the integrity of the Laguna Beach network and protect species and habitat diversity.

Our members look forward to the California Fish and Wildlife Commission continuing to protect our coastal environment and habitat for present and future generations.

Village Laguna is a nonprofit, all volunteer organization founded in 1971 to protect our oceanfront from high-rise hotels. Over the years, our organization has worked to preserve and enhance the unique village character of Laguna Beach as well as protecting its surrounding greenbelt and bluebelt. For more information go to [www.villagelaguna.org](http://www.villagelaguna.org).

Sincerely,

Merrill Anderson

President, Village Laguna, Inc.

CC: City Council of Laguna Beach, City Manager Dave Kiff, Assistant CM Jeremy Frimond

**From:** Katie Cahill <[REDACTED]>  
**Sent:** Sunday, February 15, 2026 11:57 AM  
**To:** CITYCOUNCIL@LAGUNABEACHCITY.NET; FGC <FGC@fgc.ca.gov>  
**Cc:** Kayla Johnson <[REDACTED]>  
**Subject:** Laguna Businesses in Support of the Bluebelt Petition 23-24R

Dear Mayor and City Councilmembers,

We, Hotel Joaquin, support the Laguna Bluebelt MPA Petition 2023-24R to protect South Laguna's marine ecosystems, ensuring that all of Laguna Beach's coast remains a sanctuary for marine life and a lasting legacy for Californians and visitors alike. The economic benefits of a city-wide fully protected Marine Protected Area will play a central role in the success of Laguna's businesses and stewardship initiatives.

Sincerely,

**Katie Cahill | General Manager**

985 N Coast Hwy, Laguna Beach CA, 92651

**T 949.494.5294** | [REDACTED]

[www.hoteljoaquin.com](http://www.hoteljoaquin.com)

HOTEL JOAQUIN  
*laguna beach*

From: Mike Beanan <[redacted]>

Sent: Friday, March 13, 2026 3:30 PM

Subject: : Study finds kelp forests thrive inside Laguna Beach State Marine Reserve

Subject: Study finds kelp forests thrive inside Laguna Beach State Marine Reserve

See the video here: [Study finds kelp forests thrive 031326 - Stu News Laguna](#)



# Stu News Laguna

Laguna Beach's Online Newspaper and Community Forum

Share this story...

## Study finds kelp forests thrive inside Laguna Beach State Marine Reserve

A recently released survey report by scientists with the Reef Check Foundation determined “the kelp forest ecosystem inside the Laguna Beach State Marine Reserve (SMR) has stable kelp densities and currently has higher giant kelp densities than the (unprotected) ecosystems surveyed at Thousand Steps Beach and Three Arch Bay.”

Courtesy of Laguna Bluebelt

### ***LB kelp forest ecosystem shows higher giant kelp densities than unprotected ecosystems***

“The urchin populations outside of the Laguna Beach SMR and SMCA may have led to increased grazing pressure on the algae communities”...while unregulated “fishing pressure on urchin predators on lobster and sheephead at sites outside MPAs may allow much larger populations on urchins to thrive on those reefs.”

Based upon the current status of the sites at Thousand Steps and Three Arch Bay and the documented stability of the kelp forest ecosystem inside the Laguna Beach SMR, it is reasonable to conclude expanding the Laguna SMCA to include the last mile will have positive impacts on the health of those rocky reef ecosystems.

Sea urchin barrens along the California coast have destroyed kelp forests and essential fish habitats. Giant kelp can grow as much as two feet per day to capture atmospheric carbon as a powerful natural opportunity for carbon sequestration.

For centuries, fishing was considered an unlimited, sustainable source for abundant seafood. Yet centuries of overfishing have collapsed fisheries worldwide forcing the creation of 124 MPAs in California and hundreds more globally to protect and restore fragile fish populations.

The Reef Check Foundation, founded in 1996, is an international non-profit organization dedicated to the conservation of tropical coral reefs and temperate kelp forests. The Reef Check Survey Report can be reviewed [here](#).

Contacts:

Mike Beanan, [redacted]

Jaclyn Mann, [redacted]

Jordan Manning, [redacted]

California Fish and Game Commission  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814



2/27/2026

Re: Petition 2023-24MPA – Southward Expansion of the Laguna Beach Marine Protected Area

Dear Commissioners,

Please find comments on Petition 2023-24MPA, regarding the proposed southward expansion of the Laguna Beach Marine Protected Area (MPA) network. These comments are offered from the perspective of a fisherman and scientist with both research and practical experience in the region. I previously served as a regional stakeholder during California's original South Coast Region MPA planning process and participated in boundary evaluation and network design discussions specific to the Laguna coastline. I have both applied and scientific familiarity with the ecological and socioeconomic considerations relevant to Petition 2023-24MPA.

The proposed southward expansion raises questions about compliance with Marine Life Protection Act (MLPA) design criteria, as the location is strongly influenced by the Aliso Creek Ocean Outfall (ACOO). The ACOO discharges treated wastewater and desalination brine in the immediate vicinity of the proposed expansion area<sup>1</sup>. The environmental impacts of this non-fishing stressor are not well documented and need to be considered prior to any expanded protections are offered to the area proximal to the ACOO discharge.

The following considerations explain why more information is needed before expanding protections in the Laguna MPA network.

### 1. Best Available Science Must Consider Non-Fishing Stressors

The MLPA Master Plan emphasizes the use of the best available science to ensure MPAs protect representative habitats and achieve ecological objectives. The area proposed for expansion, immediately south of the existing Laguna State Marine Reserve (SMR) and State Marine Conservation Area (SMCA), is strongly influenced by the ACOO, which discharges treated wastewater and desalination brine approximately 1.26 miles (6,700 feet) offshore<sup>1</sup>. On average, roughly 10 million gallons per day are released just beyond the SMR and SMCA boundaries. A 2016 SOCWA plume study shows that this discharge is generally transported alongshore from northwest to southeast, directly influencing the waters proposed for expanded protection in the 2023-24MPA proposal<sup>2</sup>.

The ACOO represents an environmental stressor that must be considered independently of fishing pressure. The current proposal does not: (1) Discuss the presence of the ACOO, (2) Consider the environmental effects of chronic (46-year) exposure to wastewater discharge, (3) Consider the degree to which the environment may currently be altered from its original state, or (4) Consider how future fluctuations in discharge flow may impact the long-term success of any additional restrictions to this region.

### 2. Habitat Condition and Network Design Principles

<sup>1</sup> [www.waterboards.ca.gov/sandiego/board\\_decisions/adopted\\_orders/2022/r9\\_2022\\_0006.pdf](http://www.waterboards.ca.gov/sandiego/board_decisions/adopted_orders/2022/r9_2022_0006.pdf)

<sup>2</sup> [www.waterboards.ca.gov/sandiego/board\\_info/agendas/2022/mar/item9/item9\\_sd4.pdf](http://www.waterboards.ca.gov/sandiego/board_info/agendas/2022/mar/item9/item9_sd4.pdf)

Under the MLPA Master Plan, California's MPAs were designed to protect marine life primarily by reducing fishing and other extractive activities with the goal of building a connected network of representative habitats along the coast. The Master Plan's site selection guidelines emphasize prioritizing areas with high habitat quality and avoiding locations where unmanaged external stressors could limit the likelihood of achieving conservation objectives. Because marine protected areas are designed to address extractive uses rather than land-based pollution, the guidance supports focusing protections in areas where ecological benefits are expected to result from removing fishing pressure. Because MPAs do not have the authority to control land-based discharge or water quality, expanding boundaries to include areas influenced by the ACOO would not be consistent with the criteria used in the original selection process.

Further, the location of the ACOO and its potential environmental impacts were considered, at length, during the original South Coast MPA planning process. The decision not to extend full protection south of the outfall reflected both environmental concerns as well as the area's documented importance to the local fishing community. Expanding protections into this area now, without a clear understanding of the ecological conditions around the ACOO, raises questions about the quality of the habitat proposed for protection and whether removing fishing restrictions will restore this habitat to a state that is comparable to other protected areas in the MPA network. Any future changes to the Laguna MPA network should be centered on clear, science-based evidence that provide measurable ecological benefits and supports the original design principles of the MLPA.

### 3. Socioeconomic Considerations

Petition 2023-24MPA would further reduce fishing access along a stretch of coastline that is already highly constrained by existing marine reserves and conservation areas. For the Laguna fishing community, the original MPA process resulted in the loss of access to much of the region's rocky and hard-bottom substrate. These areas are especially important for nearshore species and have traditionally supported local recreational and small-scale commercial fishing operations. The remaining accessible areas are therefore disproportionately meaningful, both economically and culturally, to the fishing community.

We ask the Commission to consider that the current Laguna MPA boundaries were established through a comprehensive, multi-year public process. The original South Coast planning effort aimed to protect the environment while also considering local communities and businesses, as required by the MLPA.

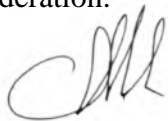
### Conclusion

Given the concerns outlined above, Petition 2023-24MPA should not be approved until clear, science-based evidence demonstrates that the proposed expansion will achieve the ecological objectives of the MLPA. Any changes to the Laguna MPA network must also carefully consider the socioeconomic impacts on local fishing communities.

Thank you for your consideration.

Chugey Sepulveda, PhD  
Executive Director PIER  
315 Harbor Dr. S. Oceanside  
CA 92054

Chugey@pier.org; www.pier.org





**February 16, 2026**

**RE: Opposition to Petition 2023-27MPA\_AM1 (Anacapa SMR)**

Dear Commissioners,

The Commercial Fishermen of Santa Barbara, Ventura County Commercial Fishermen's Association and California Lobster and Trap Fishermen's Association collectively represent the majority of the fishing families who have worked the waters of Anacapa Island for generations. We have reviewed the scientific evidence presented in this petition carefully, and we acknowledge that the research raises legitimate concerns about eelgrass habitat impacts at Frenchy's Cove.

However, this petition pursues the wrong regulatory mechanism and does not uphold the Commission's recently adopted **Coastal Fishing Communities Policy**. This is not an MPA design problem — it is a fishery management issue that calls for adaptive, data-driven seasonal tools developed through meaningful stakeholder engagement.

### **I. Failure to Meet Coastal Fishing Communities Policy Objectives**

The Coastal Fishing Communities Policy commits the Commission to:

- (1) meaningfully engage fishing communities;
- (2) factor community interests into decision-making; and
- (3) increase adaptive capacity and resilience.

This petition falls short on all three fronts and as such will set a dangerous precedent if it moves forward.

#### **A. Lack of Meaningful Engagement**

No meaningful fisheries stakeholder engagement has shaped this petition. The petitioner's report on outreach (Staff Summary for August 14-15, 2024) states "*We spoke with a couple*

*of Santa Barbara County lobster fishers...We are still looking to speak with a Channel Islands lobster fisher to get a more applied perspective.”* Given that lobster fishers are the primary impacted party to this regulatory change, and given the copious time spent by the petitioners on public outreach, it is surprising that this is the extent of their engagement with lobster fishers. In CFSB’s own meeting with the petitioners, the discussion focused only on their Mishopshno petition, as reported by the petitioners. No structured outreach occurred to harbor businesses, processors, or crew whose livelihoods would be directly impacted.

In any case, the stakeholder engagement needs to be a structured process with clear metrics of success and terms of notification and documentation. This approach is needed to fulfill the Policy’s requirement for meaningful, collaborative engagement — especially where regulatory changes would permanently alter access to fishing grounds.

### **B. Absence of Socioeconomic Impact Analysis**

The petition fails to meaningfully evaluate social and economic impacts on fishing communities, despite clear direction under the MLMA, Coastal Act, and the Commission’s own policies to minimize adverse community effects where conservation goals can still be met. There is no assessment of lost income, operational displacement, safety risks, cumulative regulatory burden, or adaptive capacity. Instead, permanent spatial exclusion is treated as the default tool, without comparison to less disruptive management alternatives.

### **C. Undermining Community Resilience and Adaptive Capacity**

The petition proposes a static regulatory structure that cannot easily respond to environmental variability, monitoring results, or future learning. Using the MPA petition process instead of a fisheries management process to change regulations is effectively fixed, and reversing it requires another multi-year petition process — even if eelgrass recovers or fishing impacts prove minimal. This rigidity is incompatible with the Policy’s emphasis on adaptive, learning-oriented management systems in a rapidly changing ocean.

## **II. This Is a Fishery Management Issue — Not an MPA Design Issue**

Proposing new depth closures for the lobster trap fishery at Frenchy’s Cove to protect eelgrass can be accommodated by the Department’s established process to amend fishery management plans, in keeping with goal 5 of The Marine Life Protection Act, which calls for “effective management measures based on sound scientific guidelines.”

.

Fishery management is inherently adaptive. Seasons, area closures, and timing restrictions can be adjusted year-to-year based on monitoring data, environmental conditions, and stock assessments. This is exactly what the spiny lobster fishery management plan already does — with dynamic season dates, size limits, trap limits, and area restrictions that respond to biological data, including highly dynamic harmful algal blooms.

For instance, the petition describes eelgrass habitat at Frenchy’s Cove as occurring in the 20–45 ft depth zone. Adaptive fishery management could test whether adjusting the trap fishing depth limit from the current 20 ft to 50 ft — rather than closing to 30 meters (~98 ft) — would adequately protect eelgrass while minimizing unnecessary displacement.

### **III. The Proposed Closures Are Far Broader Than Scientifically Justified**

Although the stated objective is to protect eelgrass at Frenchy’s Cove, the proposed regulatory alternatives include closing areas far larger than the actual eelgrass footprint and potentially restrict multiple fisheries.

#### **A. Deeper Than Needed**

The petition provides no scientific justification for extending closures to 30 meters (~98 ft). The petition itself states: “Eelgrass beds at Anacapa Island are typically 20–45 feet in depth” (p. 6 of the original petition). Santa Barbara Channelkeeper’s 2010 eelgrass report similarly places eelgrass at Frenchy’s Cove in the 20–40 ft depth range. Closing waters deeper than observed eelgrass habitat is unsupported by the evidence presented.

#### **B. Larger Area Than Needed**

The petition may seek to close the entire western front side of Anacapa Island, despite the fact that Frenchy’s Cove is a small, discrete cove with historically less than four acres of eelgrass — and is the only eelgrass site on the western front of the island (See Channelkeeper 2010 eelgrass report). This is disproportionate and unjustified. The remainder of the shallow waters in the proposed area are rocky habitat that do not grow eelgrass, aside from one small inlet.

These overbroad closures would impose unnecessary burdens on fisheries for no clear conservation gain, violating the Fishing Communities Policy requirement to minimize adverse community impacts where conservation goals can still be achieved.

### **IV. Problematic Precedent**

If approved, this petition sets a troubling precedent: documented habitat impacts from fishing gear would become grounds for converting SMCAs to SMRs even where adaptive fisheries management tools have not been attempted. This would erode confidence in

California's fisheries governance frameworks and create regulatory uncertainty across working waterfronts statewide.

California's fishery managers have successfully used temporal and seasonal restrictions for decades to protect sensitive habitats and life stages — rockfish spawning closures, salmon season modifications based on run strength, crab season delays to avoid whale entanglement. These tools work. They are adaptive. They respond to monitoring data. This is the appropriate framework here.

## **V. Conclusion**

We support eelgrass conservation and effective habitat protection. But this petition bypasses the Commission's Coastal Fishing Communities Policy by proposing permanent access restrictions without meaningful community engagement, socioeconomic analysis, or serious evaluation of adaptive fishery management alternatives. It reduces resilience rather than strengthening it.

We urge the Commission to deny this petition and instead direct the Department to pursue collaborative, adaptive fishery management solutions that protect habitat while sustaining California's coastal fishing communities — consistent with the MLMA, Coastal Act, and the Commission's own policies.

Respectfully submitted,

### **Commercial Fishermen of Santa Barbara**

Chris Voss, President

Kim Selkoe, Executive Director

### **California Lobster and Trap Fishermen's Association**

Ava Schulenberg, Executive Director

### **Ventura County Commercial Fishermen's Association**

Jason Woods, President

Dave Colker, Executive Director

February 10, 2026

Mr. Erika Zavaleta, President  
California Fish and Game Commission  
715 P Street, 16th Floor  
Sacramento, CA 95814

**Re: Support for Petition 2023-28MPA**

Dear President Zavaleta and Honorable Commissioners:

I am writing to express my strong support for the proposed Point Sal State Marine Reserve (Petition 2023-28MPA) near the city of Guadalupe in Santa Barbara County. Conserving this special area will help protect and restore ocean health, enhance coastal recreation experiences, and help ensure Santa Barbara County's coastal economy thrives for decades to come. I have been a professional marine biologist who has worked for over 40 years along the California central coast and am knowledgeable of the value of this area to the conservation of the coast. Therefore, I strongly urge you to approve this proposal.

Point Sal MPA would conserve important habitats that support rich biodiversity, such as kelp forests, rocky reefs, tidepools, sandy beaches, migratory whale corridors, an important larval retention zone, and a seabird and sea lion rookery. Protecting these areas would have positive impacts that spread beyond their boundaries, bolstering ocean resilience and keeping our coastal waters healthy. This area holds cultural significance for several Indigenous communities in our region. Designating this MPA would honor and strengthen the Chumash peoples' stewardship of the area and elevate their historical and present-day connection to the region.

In addition, this area holds special importance for ocean and coastal recreation communities. Point Sal is home to stunning coastal bluff trails that are frequented by local hikers and tourists to view wildlife, relax at the beach, and enjoy the remote and pristine area. By making the ocean healthier and more resilient to climate change, strong marine protections help preserve everyone's ability to enjoy these areas through a variety of recreational activities, far into the future. This also benefits our economy – collectively, ocean-based recreational activities contribute to our state's \$28 billion ocean tourism and recreation economy.<sup>1</sup> In 2023, coastal tourism brought just over \$2 billion in travel-related spending to Santa Barbara County and supported more than 20,000 jobs.<sup>2</sup>

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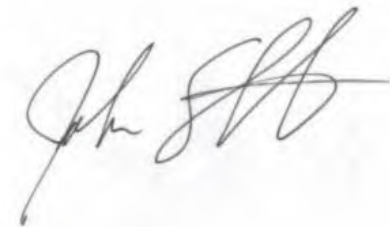
<sup>1</sup> NOAA 2016, The National Significance of California's Ocean Economy  
<https://coast.noaa.gov/data/digitalcoast/pdf/california-ocean-economy.pdf>

<sup>2</sup> Visit California, 2024. The Economic Impact of Travel in California.  
<https://industry.visitcalifornia.com/research/economic-impact>

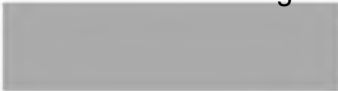
Although retired from my previous position as the president and principal scientist at Tenera Environmental where I managed the marine environmental monitoring studies at the Diablo Canyon Power Plant, I am now volunteering with NOAA as one of the scientists working on the recovery of the black abalone. The Point Sal MPA would provide an ideal location for future restoration efforts for black abalone as it is isolated from high levels of public access. It is also the first stretch of intertidal rocky south of Shell Beach and likely experiences high levels of upwelling and currents that could help distribute any larvae produced from restoration efforts.

The Commission's continued work to protect our state's biodiversity is critical, at a time when ocean conservation is more important than ever. Thank you for the opportunity to express my strong support for this proposal that aims to fill a current gap in network design to improve ecological connectivity throughout the region, provide additional resilience in the face of climate change, and protect critical marine habitats.

Sincerely,

A handwritten signature in black ink, appearing to read "John Steinbeck", written in a cursive style.

John Steinbeck  
Retired Marine Biologist





# The Land Trust for Santa Barbara County

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NATURAL RESOURCES,  
AGRICULTURAL LAND  
AND OPEN SPACES FOR  
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February 17, 2026

Erika Zavaleta, President  
California Fish and Game Commission  
715 P Street, 16th Floor  
Sacramento, CA 95814  
[fgc@fgc.ca.gov](mailto:fgc@fgc.ca.gov)

### **Re: Support for Petition 2023-28MPA, proposed Point Sal State Marine Reserve**

Dear President Zavaleta and Honorable Commissioners,

On behalf of The Land Trust for Santa Barbara County (Land Trust), I would like to express support for Petition 2023-28MPA to designate the Point Sal State Marine Conservation Area off the coast of Point Sal in Santa Barbara County. The Land Trust is a non-profit 501 (c)(3) organization with a mission to conserve natural resources, agricultural land, and open spaces for the benefit of present and future generations. Over its 40-year history, the Land Trust has served Santa Barbara County by partnering with landowners and communities to conserve thousands of acres of agricultural land, natural resources and open spaces. We support the proposed Point Sal SMCA to protect the natural resources and wildlife habitats of this area, and the central coast communities that rely on these waters for economic and climate resilience.

Point Sal supports significant coastal ecosystems, rich cultural resources, and Chumash heritage. The Land Trust has partnered with the County of Santa Barbara to protect the Point Sal Reserve, an area of special recreational importance to the communities of the Santa Maria Valley. Through development of the Santa Barbara County Conservation Blueprint and our ongoing work, the Land Trust has identified the stretch of coastline from Point Sal to the Guadalupe-Nipomo dunes that abuts the proposed SMCA as among the highest priority areas for conservation in our County.

Numerous sensitive species use these coastal and near shore habitats including snowy plover and Southern California steelhead, among others. Climate change impacts, such as sea-level rise, intensified storms, and altered precipitation patterns, threaten this delicate landscape. This area simultaneously faces mounting challenges from escalating development pressures, rapid urbanization, infrastructure projects, and tourism, all of which jeopardize its resilience. The proposed sanctuary would be dedicated to preserving the unique coastal ecosystems, rich cultural resources, and Chumash heritage of these regions,

marking a key step in the resilience of this essential stretch of California coast.

Importantly, the SMCA is supported by Chumash bands from this region. Tribes have played a critical role in stewardship of this region for at least the past 10,000 years, and Chumash communities remain leaders in efforts to protect and maintain their natural and cultural heritage. Elevating the role of Chumash bands in both the naming and on-going management of the proposed sanctuary is an important step in recognizing and empowering Chumash communities as central to the protection of these coasts and waters.

Thank you for the opportunity to comment on this designation process.

Sincerely,



Meredith Hendricks, Executive Director



February 20, 2026

California Fish and Game Commission

RE: Petition 2023-28MPA to create the Point Sal State Marine Conservation Area

Dear President Sklar and Honorable Commissioners,

I am writing on behalf of Point Blue Conservation Science (Point Blue) to support the proposed designation of the Point Sal State Marine Conservation Area (SMCA) and to provide biological information relevant to this important section of central California. I am writing this letter from a biodiversity conservation perspective and citing Point Blue's scientific studies to demonstrate that establishing an SMCA in the area around Point Sal is warranted for the following reasons:

- 1) The waters and offshore islet called Lion Rock within the proposed SMCA boundaries provide important habitat for seabird nesting, roosting, and foraging as well as an important marine mammal haul out area
- 2) As a headland, Point Sal creates recirculating currents, and thus larval retention, in its lee and enhances juvenile fish and invertebrate recruitment to habitats that will be protected by the proposed SMCA
- 3) Habitats in the lee of Point Sal and on the shelf adjacent to Point Sal have been demonstrated to be persistent feeding hot spots for breeding and migratory seabirds
- 4) The location of the proposed SMCA will fill a spacing gap within the California MPA network

At Point Blue, we advance conservation of birds, other wildlife, and ecosystems through science, partnerships, and outreach. Our scientists work to reduce the impacts of climate change and other environmental threats, including shipping, fishing, and habitat loss while promoting nature-based solutions for wildlife and people, on land and at sea.

Point Blue is an independent, scientific research non-profit. We conduct research to support marine wildlife conservation and healthy marine ecosystems. One of our priority initiatives is to conduct applied science to guide ocean management to reduce threats to wildlife and support sustainable human uses. We conduct research on the Farallon Islands and throughout coastal California that helps state and federal agencies manage priority species, and we conduct at-sea research in collaboration with NOAA's National Marine Sanctuaries to provide information that helps manage threats to marine life within the Sanctuaries.

I served on the Science Advisory Team for the South Coast Study Region of the Marine Life Protection Act Initiative (MLPAI) and my coastal team at Point Blue has collected data on breeding and roosting seabird abundance, reproductive success, foraging habitat use, and rates

of human-caused disturbance within and adjacent to the proposed Point Sal SMCA for over 20 years. Additionally, our coastal program biologists collected baseline data on these same seabird metrics throughout all four study regions of the MLPAI. Citations for these studies are listed below. Results from these studies support the justifications mentioned within the petition to establish the Point Sal SMCA. Point Sal is within a remote area of the California coast that currently experiences little to no human-caused disturbance to wildlife. Lion Rock, a small islet in the lee of Point Sal and within the proposed SMCA boundaries, is a significant roosting site for Brandt's cormorants (*Urile penicillatus*) and recently delisted California brown pelicans (*Pelecanus occidentalis californicus*) and a significant haul-out site for California sea lions (*Zalophus californianus*) (Robinette et al. 2015). Furthermore, Brandt's cormorants have recently started nesting on Lion Rock (Point Blue unpublished data). The waters in the lee of Point Sal provide important foraging habitat to numerous species of seabirds, likely due to the headland's role in creating a larval retention zone (Robinette et al. 2019). Our research has shown that seabirds are attracted to retention zones in the lee of coastal headlands as they create hotspots for the recruitment of juvenile fishes, and important prey for seabirds (Robinette et al. 2007, 2012, 2018, and 2019).

According to CDFW, barred surfperch (*Amphistichus argentus*) is the most common species harvested recreationally along sandy beaches in this region. It is our understanding that the majority of fish caught from surf zone fishing within the proposed SMCA are barred surfperch, which are viviparous – meaning they give live birth to juvenile fish, and do not broadcast spawn eggs. As such, these juvenile fish are not widely distributed by ocean currents and, unlike planktonic fish eggs and larvae, are less likely to be distributed to other MPAs within the California MPA network. Because the Point Sal SMCA will protect most other species of broadcast spawning fishes and invertebrates, its spacing between the Vandenberg SMR and Point Buchon SMR will improve the overall connectivity among MPAs within the network.

In addition to our coastal studies, Point Blue has conducted analyses on seabird and marine mammal abundance and distribution throughout state and federal waters along the west coast, and has conducted an assessment that identifies opportunities to improve ocean conservation throughout the California Current System (Vancouver to Baja California). Results from these analyses show that the proposed SMCA resides in an area of high biological importance (Elliott et al. 2020) and that the waters over the shelf support a high abundance of foraging and migrating seabirds and that this hotspot is persistent from year to year (Nur et al. 2011).

Point Blue supports the creation of the Point Sal SMCA and we hope you will consider our research and expertise in your assessment and final decision. If you would like further information, please contact me at [drobinette@pointblue.org](mailto:drobinette@pointblue.org) or 805-757-0838.

Sincerely,



Dan Robinette, Coastal Program Leader

Cc: Melissa Pitkin, Chief Executive Officer  
Catherine Hickey, Acting Chief of Staff and Director of the Pacific Coast and Central Valley Group  
Liz Chamberlin, Director of Innovation  
Grant Ballard, Chief Science Officer  
Jaime Jahncke, Director of the California Current Group

Literature Cited:

Elliott N, Veloz S, Elliott ML, Jahncke J. 2020. Assessment of Marine Protected Areas in the California Current. Unpublished Report, Point Blue Conservation Science, Petaluma, CA. Point Blue Contribution No. 2294

Nur, N., J. Jahncke, M.P. Herzog, J. Howar, K.D. Hyrenbach, J.E. Zamon, D.G. Ainley, et al. 2011. Where the wild things are: Predicting hotspots of seabird aggregations in the California Current System. *Ecological Applications* 21 (6): 2241–57.

Robinette, D.P., J. Howar, W.J. Sydeman, and N. Nur. 2007. Spatial patterns of recruitment in a demersal fish as revealed by seabird diet. *Marine Ecology Progress Series* 352: 259–268.  
Robinette, D. P., N. Nur, A. Brown, and J. Howar. 2012. Spatial distribution of nearshore foraging seabirds in relation to a coastal marine reserve. *Marine Ornithology* 40: 111–116.

Robinette, D.P., J. Howar, and H. Hyatt. 2015. Seabird population and disturbance monitoring within the Point Sur to Point Mugu study region of the Seabird Protection Network, 2011 – 2014. Unpublished Report, Point Blue Conservation Science, Petaluma, CA.

Robinette, D. P., J. Howar, J. T. Claisse, and J. E. Caselle. 2018. Can nearshore seabirds detect variability in juvenile fish distribution at scales relevant to managing marine protected areas? *Marine Ecology*: doi:10.1111/maec.12485.

Robinette, D.P., N. Nur, and J. Jahncke. 2019. Spatial patterns in nearshore juvenile fish abundance as revealed by seabird foraging rates. *CalCOFI Reports* 60: 109-122.

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**Fw: Support for Petitions 2023-28MPA and 2023-29MPA**

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**From:** BILL WOODBRIDGE [REDACTED]  
**Sent:** Wednesday, March 4, 2026 04:39 PM  
**To:** FGC <FGC@fgc.ca.gov>  
**Subject:** Support for Petitions 2023-28MPA and 2023-29MPA

Dear President Zavaleta and Honorable Commissioners:

I am writing to express my strong support of the proposed Point Sal State Marine Reserve (Petition 2023-28MPA) near the city of Guadalupe, and the Mishopshno State Marine Conservation Area (Petition 2023-29MPA) off the coast of Carpinteria. Conserving these two special areas will help protect and restore ocean health, enhance coastal recreation experiences, and help ensure Santa Barbara County's coastal economy thrives for decades to come. I urge you to approve these proposals.

Both the proposed Point Sal and Mishopshno MPAs would conserve essential habitats that support rich biodiversity, such as kelp forests, rocky reefs, tidepools, sandy beaches, migratory whale corridors, a larval retention zone, and a seabird and sea lion rookery. Protecting these areas would have positive impacts that spread well beyond their boundaries, bolstering ocean resilience and keeping our coastal waters healthy. These two areas hold cultural significance for several Indigenous communities in our region. Designating these MPAs would honor and strengthen the Chumash peoples' stewardship of the area, and elevate their historical and present-day connection to the region.

In addition, these areas are treasured by ocean and coastal recreation communities. Point Sal is home to stunning coastal bluff trails frequented by local hikers and tourists to view wildlife, relax at the beach, and enjoy the remote, pristine area. Carpinteria is a popular area for surfers, shore fishers, swimmers, kayakers, birdwatchers, and beach walkers. By making the ocean healthier and more resilient to climate change, strong marine protections help preserve everyone's ability to enjoy these areas through a variety of recreational activities, far into the future. This also benefits our economy – collectively, ocean-based recreational activities contribute to our state's \$28 billion ocean tourism and recreation economy. In 2023, coastal tourism brought just over \$2 billion in travel-related spending to Santa Barbara County, and supported more than 20,000 jobs.

The Commission's continued work to protect California's biodiversity is critical. And ocean conservation is more important than ever, given escalating threats to our marine ecosystems. Thank you for the opportunity to express our strong support for these proposals that aim to fill a current gap in network design to improve ecological connectivity throughout the region, boost resilience in the face of climate change, and protect critical marine habitats and ocean wildlife.

Sincerely,

Bill Woodbridge  
Santa Barbara

**From:** Jennifer Bauer <[REDACTED]>

**Sent:** Friday, March 20, 2026 1:01 PM

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

**Subject:** In support of MPA Network expansion

Dear California Fish & Game Commission,

As a Californian from San Luis Obispo, I support the expansion of the California's Marine Protected Area Network, including the designation of the proposed State Marine Conservation Area off Point Sal. I support the MPA network because I have lived my whole life (60 years) near the ocean and know the importance of keeping our oceans healthy. I love to surf, paddle board, and explore my local beaches. The health of the ocean reflects the health of our earth and its people.

Point Sal is particularly important because of its rich biodiversity and cultural significance to the Chumash people. Preserving this unique coastal area will draw visitors seeking healthy outdoor places of recreation and give a boost to the local economy. Last, designating Point Sal as an MPA will help in California's goal to preserve and protect 30% of lands and coastal waters by 2030.

Sincerely,

Jennifer Bauer

[REDACTED]

San Luis Obispo, CA [REDACTED]

From: Joanne Dean-Freemire <[REDACTED]>  
Sent: Thursday, March 19, 2026 9:54 PM  
To: FGC <FGC@fgc.ca.gov>  
Subject: Point Sal proposed Marine protected area

Please create a marine protected area at point Sal. These areas produce more fish for fishermen in unprotected areas.  
And protect many more Marine species.  
Sent from my iPhone



# The Land Trust for Santa Barbara County

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Jim Selbert

Scott Van Der Kar

February 17, 2026

Erika Zavaleta, President  
California Fish and Game Commission  
715 P Street, 16th Floor  
Sacramento, CA 95814  
[fgc@fgc.ca.gov](mailto:fgc@fgc.ca.gov)

### **Re: Support for Petition 2023-29MPA, proposed Mishopshno State Marine Reserve**

Dear President Zavaleta and Honorable Commissioners,

On behalf of The Land Trust for Santa Barbara County (Land Trust), I would like to express support for Petition 2023-29MPA to designate the Mishopshno State Marine Conservation Area off the coast of Carpinteria in Santa Barbara County. The Land Trust is a non-profit 501 (c)(3) organization with a mission to conserve natural resources, agricultural land, and open spaces for the benefit of present and future generations. Over its 40-year history, the Land Trust has served Santa Barbara County by partnering with landowners and communities to conserve thousands of acres of agricultural land, natural resources and open spaces. We support the proposed Mishopshno SMCA to protect the natural resources and wildlife habitats of this area, and the central coast communities that rely on these waters for economic and climate resilience.

The Carpinteria coast supports significant coastal ecosystems, rich cultural resources, and Chumash heritage. The Land Trust has partnered with local communities to protect several important conservation areas in the region including the Carpinteria and Rincon Bluffs, and the Carpinteria Salt Marsh where the Land Trust's preserve would abut the proposed SMCA. The Carpinteria Salt Marsh is a critically important estuary in the region, that provides an interface between essential marine communities and near shore habitats, while providing an access point for the community to experience this coastal treasure. The proposed SMCA would complement and strengthen the onshore protection of this unique reserve.

Numerous sensitive species use these coastal and near shore habitats including snowy plover and salt marsh birdsbeak, among others. Climate change impacts, such as sea-level rise, intensified storms, and altered precipitation patterns, threaten this delicate landscape. This area simultaneously faces mounting challenges from escalating development pressures, rapid urbanization,

infrastructure projects, and tourism, all of which jeopardize its resilience. The proposed SMCA would be dedicated to preserving the unique coastal ecosystems, rich cultural resources, and Chumash heritage of these regions, marking a key step in the resilience of this essential stretch of California coast.

Importantly, the SMCA is proposed and supported by Chumash bands from this region. Tribes have played a critical role in stewardship of this region for at least the past 10,000 years, and Chumash communities remain leaders in efforts to protect and maintain their natural and cultural heritage. Elevating the role of Chumash bands in both the naming and on-going management of the proposed SMCA is an important step in recognizing and empowering Chumash communities as central to the protection of these coasts and waters.

Thank you for the opportunity to comment on this designation process.

Sincerely,



Meredith Hendricks, Executive Director



March 31, 2026

**To:**

The California Fish and Game Commission – Tribal Committee  
fgc@fgc.ca.gov

**Re:** April 14, 2026 Tribal Committee Meeting – Opposition to MPA Petition Actions Affecting the California Spiny Lobster Fishery

Dear Chair Hostler-Carmesin and Members of the Tribal Committee,

For over 26 years, the California Lobster & Trap Fishermen's Association (CLTFA), a 501(c)6 non-profit organization, has been established as a corporation to aid, encourage, and promote activities and affairs that maintain the populations of the California Spiny Lobster species off the coast and islands of the State of California at levels of maximum sustained yields as well as further the goal of viable and equitable access to such living marine resources by commercial fishermen licensed by the State of California. CLTFA is a well-respected organization within the California fishing community and represents the interests of vastly experienced trap fishermen from a variety of regions from Point Conception to San Diego. On behalf of CLTFA, we respectfully submit the following comments regarding Marine Protected Area (MPA) regulation change petitions.

First and foremost, we want to make it clear that we recognize and hold the utmost respect for the importance of Tribal stewardship, cultural connections to marine resources, and the role of Tribal perspectives in ocean governance. We support collaborative, co-management approaches where they are grounded in meaningful engagement, sound science, and equitable consideration of all affected communities. However, we must express strong opposition to the use of the MPA petition process as currently applied to expand or create new closures that disproportionately impact the California spiny lobster fishery (among other California commercial fisheries) without adequate justification.

**Disproportionate Impacts to the Spiny Lobster Fishery Specifically**

The California spiny lobster fishery is widely recognized as a sustainably managed fishery operating under strict regulatory controls. Our fishery is especially vulnerable to spatial closures. Unlike more mobile or pelagic fisheries, lobster fishing is highly dependent on specific, nearshore habitats that fishermen have developed knowledge of over decades; These are not interchangeable grounds.



Data presented in the petition opposition materials show that areas under consideration, such as Anacapa Island (Frenchy's Cove), Carpinteria Reef, and portions of the Santa Barbara Channel, are among the highest-value trap fishing grounds in the region. For example:

- According to CDFW landings data, in Block 652 near Carpinteria, over 200,000 pounds of trap-caught landings were recorded over the past decade, with 100–200 vessels utilizing the area and up to 2,500 landing receipts documented.
- Regional spatial mapping surveys conducted with 53 commercial fishermen using SeaSketch technology in 2024/25 identified multiple proposed closure areas as “high” to “maximum” value for trap fisheries, indicating their irreplaceable importance to fishing operations.

Loss of access to these areas cannot be mitigated by shifting effort elsewhere. Instead, closures result in fleet compression, compaction of available fishing zones, reduced catch efficiency, increased safety risks, and secondary ecological impacts from displaced effort.

### **Petition 27 (Anacapa) Demonstrates the Wrong Regulatory Approach**

Petition 2023-27 (Anacapa SMR) is particularly illustrative of the broader issue. While eelgrass protection is a legitimate goal, the petition proposes permanent spatial closures through the MPA process rather than utilizing adaptive fishery management tools.

The best available information indicates eelgrass at Frenchy's Cove occurs primarily in the 20-45 ft depth range. Yet the petition proposes closures extending far deeper and across a broader area than the habitat footprint warrants.

The spiny lobster fishery already operates under a robust management framework—including seasonal limits, trap limits, size restrictions, and the ability to implement depth-based or temporal adjustments. A compromise such as targeted depth restrictions (e.g., modifying trap deployment depths at certain times) could protect eelgrass while maintaining access to fishing grounds.

Using MPAs as a substitute for fishery management creates rigid, difficult/impossible-to-reverse closures that are inconsistent with adaptive management principles and unnecessarily harmful to fishing communities and their beneficiaries.

### **Opposition to the Mishopshno (Carpinteria) Petition**

CLTFA opposes Petition 2023-29 (Mishopshno SMCA at Carpinteria). While we support Tribal co-management in principle, this proposal would close one of the most economically important



nearshore areas for trap fisheries in the Santa Barbara Channel *without* clear ecological justification. The Carpinteria Reef/Block 652 area supports substantial trap-caught landings and is relied upon by a large number of vessels, particularly during weather-limited periods when access to offshore grounds is unsafe.

Additionally, the ecological rationale for this closure is weak with respect to lobster fishing. Existing data indicate high regional connectivity of key species and no demonstrated need for additional spatial protection at this site. The proposed SMCA would also disrupt carefully managed fisheries without meaningfully advancing stated conservation goals, making it both economically harmful and scientifically unsupported.

### **MPAs Do Not Address the Primary Drivers of Ecosystem Change**

Petition 33 and related proposals cite ecosystem concerns such as kelp loss. However, the scientific record indicates that major drivers of kelp decline include marine heatwaves, disease events, and broader oceanographic conditions, *not* fishing pressure.

It is important to note that commercial fishermen, particularly divers and trap fishermen, play an active role in ecosystem monitoring and restoration. Evidence from recent pilot projects shows that targeted urchin removal by commercial operators can significantly increase kelp and algal recovery within months.

Expanding MPAs would restrict the very activities that have demonstrated success in restoring ecosystem function, while failing to address the underlying causes of decline.

### **Inadequate Consideration of Socioeconomic Impacts**

Across the petitions, there is a consistent lack of rigorous socioeconomic analysis. There has been no comprehensive assessment of:

- Lost income and reduced catch per unit (CPUE) effort
- Displacement effects and safety implications
- Cumulative spatial loss across fisheries
- Impacts to supply chains, processors, and coastal economies

The Santa Barbara port complex alone supports hundreds of jobs and landed over 23 million pounds of seafood valued at more than \$35 million in 2023. These figures underscore the scale of economic activity at stake.



For all of California's commercial fishing fleets including spiny lobster, additional closures compound existing and emerging spatial pressures, including offshore energy development, entanglement management zones, and other regulatory constraints. The cumulative effect is a continued and potentially irreversible shrinking operational footprint that threatens the long-term viability of the fleet.

### **Misuse of the MPA Petition Process**

CLTFA is particularly concerned that the petition process is being used to pursue substantial changes to California's MPA network outside of the framework established in the 2016 Master Plan. This approach bypasses the comprehensive scientific review, stakeholder engagement, and transparency that are essential for decisions of this magnitude.

MPAs are not designed to function as primary fishery management tools. Applying them in this way without first exhausting adaptive management alternatives sets a concerning precedent and undermines confidence in California's fisheries governance system.

### **Tribal Committee Considerations**

We respectfully ask the Tribal Committee to carefully consider how these petitions intersect with principles of equity, access, and working waterfront sustainability. California's commercial fishing communities, including lobster fishermen, represent longstanding cultural and economic traditions that are also worthy of protection.

We are in absolute support of Tribal co-management where it enhances stewardship and incorporates multiple knowledge systems. However, such efforts should not come at the expense of excluding existing small-scale, sustainable fisheries without *clear scientific justification*, meaningful engagement, and balanced consideration of impacts. Commercial fishermen and tribes in opposition with one another is certainly a highly undesired circumstance that we do not ever wish to be in, nor do we seek to be the case during this process.

We recognize the need to address historical injustices and support elevating Tribal priorities in ocean governance as they are in some of our neighboring states that we are fortunate to be able to learn from. However, these efforts should not result in the unnecessary displacement of existing fisheries without clear scientific justification and meaningful engagement. Commercial fishermen are often misunderstood, but we have no intention of being adversarial with tribes in the story of MPA co-management development. If we are presented with well founded scientific justifications to permanently close fishing grounds, we would have no leg to stand on, but given the fact that this entire process has been tremendously convoluted and immensely lacking in



concrete data, we request the Tribal Committee and full Fish & Game Commission to consider the impacts to California's already shrinking commercial lobster fleet and all commercial fleets comprised of small, family-owned fishing businesses.

CLTFA strongly urges the Commission and Tribal Committee to:

1. Deny or defer MPA petitions that lack clear scientific justification and adequate if not robust socioeconomic analysis
2. Prioritize adaptive fishery management tools over permanent spatial closures
3. Ensure meaningful, consistent engagement with affected fishing communities prior to any regulatory changes
4. Evaluate cumulative impacts to the spiny lobster fishery and broader commercial fleet
5. Adhere to the processes and standards established in the MLPA and 2016 Master Plan

To close, we offer a perspective shared by a commercial fisherman from Santa Barbara, Jason Woods - "... taking away fishing grounds is the equivalent of revoking a college degree - years of hard-earned knowledge and experience that cannot simply be transferred elsewhere." We would greatly appreciate the Tribal Committee and full Commission keeping this thought in mind when formulating opinions around MPA petitions that eliminate fishing grounds. To reiterate, we remain committed as a community to collaborative solutions that protect marine ecosystems while sustaining California's coastal fishing communities and food systems and we thank you for your time and consideration.

Ava Schulenberg  
Executive Director, CLTFA

Cameron Cribben  
President, CLTFA

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**CFSB comment letters on two petitions**

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**From** Kim Selkoe <kim@cfsb.info>  
**Date** Tue 02/24/2026 12:32 PM  
**To** FGC <FGC@fgc.ca.gov>  
**Cc** Shuman, Craig [REDACTED]; CHRISJVOSS@GMAIL.COM  
<CHRISJVOSS@GMAIL.COM>; Eckerle, Jenn@CNRA <Jenn.Eckerle@resources.ca.gov>

Dear Colleagues,

Please find attached two comment letters from CFSB concerning Petitions 2023-29MPA\_AM1 and 2023-33MPA-AM1 to be considered in the MPA Petition review process.

Please note that the CFSB Seasketch project referenced in these letters can be made available to members of the Commission and Department if it is of interest. The CFSB project focused on mapping the value of fishing grounds in the Santa Barbara Channel by gear type and species, as identified by 53 active commercial fishers, surveyed prior to the petition process. The methods are in the appendices to the letters.

Thank you,

Kim Selkoe

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Kim Selkoe, Ph.D.

~ ~ ~ ~ ~

Executive Director  
Commercial Fishermen of Santa Barbara  
6 Harbor Way #155  
Santa Barbara, CA 93109

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fcfsb.info%2F&data=05%7C02%7Cfqc%40fgc.ca.gov%7Cd9e1be4fa6834c53364608de73e3b962%7C4b633c25efbf40069f1507442ba7aa0b%7C0%7C1%7C639075619489335515%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOilwLjAuMDAwMCIslIAiOiJXaW4zMiltSkFOljoiTWFpbClslldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=SvipO%2F0Lzmsw6f1SiQUkP7XtjwQDfK4XpczKreGxEIw%3D&reserved=0>



**RE: Opposition to Petition 2023-29MPA-AM1 (Mishopshno SMCA)**

February 17, 2026

To the California Fish and Game Commission and Department of Fish and Wildlife:

For over 40 years, Commercial Fishermen of Santa Barbara (“CFSB”), a 501(c)3 non-profit organization, has been committed to making our local fishing community resilient and effective by providing healthy, high-quality seafood to local and global markets, ensuring the economic and biological sustainability of fisheries, and maintaining California's fishing heritage. CFSB currently has over 80 members. We represent the interests of a diverse set of fishermen, shellfish farmers, and seafood processors and distributors who are leaders in the commercial fishing industry.

Commercial Fishermen of Santa Barbara (CFSB) respectfully submits this letter in opposition to Petition 2023-29MPA-AM1, which proposes establishing a new tribally-designated SMCA at Carpinteria. While we support the principle of tribal co-management across California's MPA network, this specific petition should be rejected. We have also submitted comments as a signatory of the CCA Coalition letter on Bin 2 Petitions submitted earlier this month, but we would like to reinforce that letter with further detail about our position below and new economic data relevant to this site.

**Fisheries Connectivity Is Already High in This Region**

Many of the key fishery species at this site—groundfish, lobster, crab, and urchin—are abundant throughout the adjacent coast and Channel Islands thanks to sound fisheries management. Therefore, a large fraction of larvae recruiting into the reserve network were spawned outside of it, and the role of the proposed MPA in boosting connectivity of the network would be vanishingly small. All of the targeted higher-volume fishery species at the site have pelagic larval durations exceeding two months (California Marine Species Portal). Surface currents in the Channel are ~0.3–0.4 m/s (~26–35 km/day), transport over **14–28 days would be ~360–980 km (~22–60+ miles)** under sustained flow, so two-month larval periods are creating high connectivity (Hendershot and Winant 1996, Washburn et al. 2002). MPAs at the Northern Channel Islands are well connected to the coastal MPAs due to cyclonic current flows in the Channel. In sum, larval connectivity is already functioning across broad spatial scales—there is no ecological basis for tighter MPA spacing to achieve it.

## **This closure will disrupt key fishery management plans and create undue economic impacts.**

Carefully designed and negotiated spatial fishery management plans will be badly disrupted by this plan, namely Kelp Cutting and Halibut Trawl. There are few areas left to harvest kelp; the footprint of this MPA includes one of them. Further reduction in kelp cutting grounds would be an existential threat to The Cultured Abalone Farm's continuation. The California Halibut Trawl Grounds would be interrupted by the bounds of this MPA, creating impact of another highly limited fishery that cannot afford to lose any further area.

The proposed area encompasses the majority of offshore hard bottom substrate between Santa Barbara and Carpinteria (Figure 1). The existing Naples and Isla Vista MPAs have already protected large swaths of hard bottom that were high value grounds to many of our fisheries.



Fig. 1 The extent of hardbottom area (orange) in the coastal region, with approximate boundaries of proposed MPA. From California Seasketch portal.

The petition significantly understates the commercial fisheries activity and value in this area. We have referenced two sources of data that highlight the extreme importance of Block 652 and Carpinteria Reef to our commercial fisheries. More details about these data are in an appendix to this letter.

- CDFW block data for the Santa Barbara Channel from 2014–2023. These data were compiled by Mary Nishimoto in 2024 in her role as the Joint Oil and Fisheries Liaison for Padre's decommissioning activity planning for Platform Holly.
- Seasketch maps compiled prior to the MPA Petition process that record the value of fishing grounds in the Santa Barbara Channel, according to 53 commercial fishers at three ports in the Santa Barbara Channel, by species and gear type. This project was funded by ARPA-e MARINER program, administered by CFSB and carried out by Madeleine Berger of Seasketch in 2023 through the first quarter of 2024.

Key highlights of the CDFW data include the following statistics from Block 652:

- **100–200 fishing vessels** used this block over the last decade
- **1,000–2,500 distinct landing receipts** were recorded from the block
- **Over 200,000 lbs of trap-caught poundage** came from the block
- **Over 25,000 lbs of dive-caught poundage** came from the block

Key highlights of the Seasketch analysis are:

- The proposed area is ranked as **maximum value for box crab, lobster, ridgeback, rock crab, rockfish, sand dab, urchin, kelp**
- The area is ranked as **high value for halibut, kellet's whelk, sardines, anchovies, mackerel, white seabass, and yellowtail**
- For all fisheries data combined, the area is ranked as a mix of high and maximum fisheries value (Figure 2).

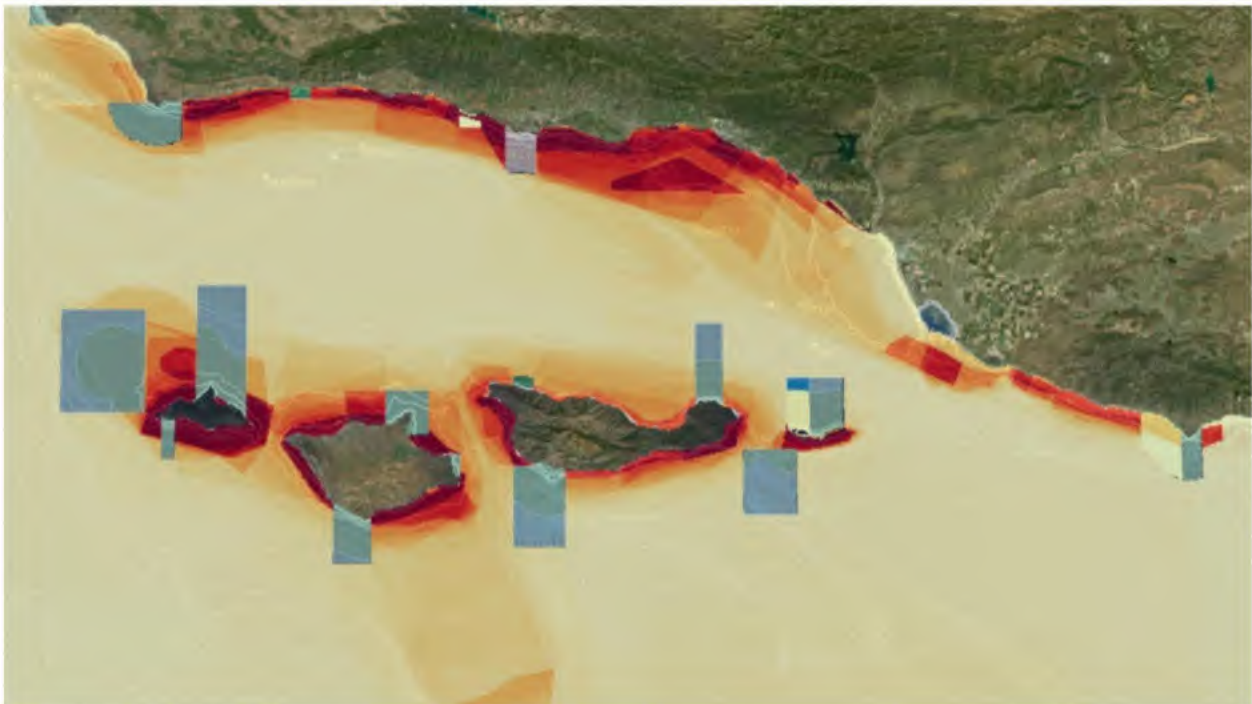


Fig. 2 Composite Seasketch heatmap showing the value of fishing grounds in the Santa Barbara Channel, for all 53 survey responses representing all species and gear types. Note that biases are possible, especially at the coastal margins, where fishers from other ports may more highly value grounds than the respondents. See appendix for more study information.

These data paint a very different picture than the petition's framing of "limited impact." The proposed SMCA would cover 18% of block 652, including the highest quality fishing grounds in the block, directly affecting the trap and dive fisheries, which constitute the majority of commercial activity in the area.

The petition states that commercial and recreational vessels "primarily visit the Channel Islands for fishing trips and **target the nearshore area around Carpinteria when weather conditions make travel to the islands unsafe or undesirable.**" The analyses in the attached CDFW and Seasketch data refute that claim – this area, very close to Santa Barbara Harbor, is essential to commercial fisheries. Moreover, in cases that it does function as a backup when conditions prevent safe passage to the islands, it is just as critical. Closing it eliminates the safety valve that allows our fishermen to remain productive during adverse weather windows—exactly when they need accessible nearshore grounds most.

## **Juvenile White Shark Protection Is Not an MPA Function—And This MPA Would Not Achieve It**

A nearly identical petition (2020-012 AM1) was rejected by the Commission at this exact location just four years ago. The FGC correctly determined that California's MPAs are designed to protect nearshore ecosystems rather than individual highly migratory species like white sharks. This precedent applies directly to the current petition.

CDFW landing data for block 652 further expose the mismatch between the petition's stated rationale and its actual effect. Hook-and-line, gillnet, and trawl landings in this block were all relatively low over the past decade, while Block 652 was a key source of poundage for trap and dive fisheries (over 200,000 lbs trap-caught, over 25,000 lbs dive-caught). Shutting down commercial fisheries here is unjustified as they do not pose a meaningful bycatch risk to white sharks.

Leading white shark researcher Dr. Chris Lowe of CSU Long Beach confirmed that this **MPA design would not provide meaningful protection for juvenile white sharks** as measured by JWS mortality rates. He specified:

- **There is only one known fishing-related JWS mortality at this site**—from recreational hook-and-line gear, which would still be permitted under the proposed SMCA. Boat strikes and occasional recreational fishing are the primary human impacts to white shark at Carpinteria Reef, and these remain minor overall (C. Lowe, pers. comm.).
- **There is no rationale for interaction between white sharks and the majority gear types used commercially here.** Peer-reviewed research documents no trap or dive fishery interactions with JWS, the majority gear types used here (Lowe et al. 2012). Prohibiting trap and dive fisheries in the proposed MPA to protect white sharks lacks biological justification.
- **A 9 square mile MPA cannot meaningfully protect a species that uses the entire Southern California Bight as nursery habitat.** Tagging data show that young-of-year white sharks may travel over 3,000 miles in their first year, with their most precarious habitat use occurring in Mexican waters. Multiple nursery aggregation sites exist along the Southern California coastline and around Santa Cruz Island, with sharks moving freely between them. While JWS may spend weeks to months at Carpinteria, they regularly move to other sites (See Anderson et al. 2021 a and b, Logan et al. 2024 and Freedman et al. 2022).

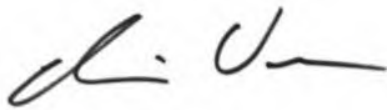
## **This Area Was Already Considered and Traded Off During the MLPA Process**

The Carpinteria site was evaluated during the MLPA southern region process and was deliberately traded off in favor of the Naples and Kashtayit SMCAs. Approving this petition would undermine the stakeholder agreements reached during that process and destroy trust and respect for future policy processes. We have been told clearly by CDFW that prior negotiations to keep Carp Reef open would be respected in the petition process.

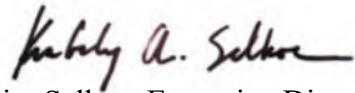
For these reasons, CFSB urges the Commission to reject Petition 2023-29MPA-AM1.

Respectfully submitted,

### **Commercial Fishermen of Santa Barbara**



Chris Voss, President



Kim Selkoe, Executive Director

### **Literature Cited**

Anderson, James M., et al. “*Non-random Co-occurrence of Juvenile White Sharks (Carcharodon carcharias) at Seasonal Aggregation Sites in Southern California.*” *Frontiers in Marine Science*, vol. 8, 2021, article 688505, <https://doi.org/10.3389/fmars.2021.688505>

Anderson, James M., et al. “*Interannual Nearshore Habitat Use of Young-of-the-Year White Sharks Off Southern California.*” *Frontiers in Marine Science*, vol. 8, 2021, article 645142, <https://doi.org/10.3389/fmars.2021.645142>.

Freedman, Ryan M., et al. “*Evidence of Increasing Juvenile White Sharks’ (Carcharodon carcharias) Habitat Use at the Northern Channel Islands.*” *Journal of Fish Biology*, vol. 103, no. 5, Nov. 2023, pp. 1226–1231, <https://doi.org/10.1111/jfb.15503>.

Hendershott, Myrl C., and C. D. Winant. “*Surface Circulation in the Santa Barbara Channel.*” *Oceanography*, vol. 9, no. 2, 1996, pp. 114–121, <https://doi.org/10.5670/oceanog.1996.14>

Logan, Ryan K., et al. “*Long-Term Tracking Captures the Timing of Ontogenetic Niche Shifts in Northeast Pacific White Sharks.*” *Ecosphere*, vol. 15, no. 1, 2024, e70034, <https://doi.org/10.1002/ecs2.70034>.

Lowe, Christopher G., et al. “*Historic Fishery Interactions with White Sharks in the Southern California Bight.*” *Global Perspectives on the Biology and Life History of the White Shark*, edited by A. Peter Klimley and David G. Ainley, CRC Press, 2012, pp. 169–186. DOI:10.1201/b11532-17.

Washburn, Libe, Brian M. Emery, and Jeffrey D. Paduan. “*The Surface Circulation of the Santa Barbara Channel as Observed with High Frequency Radar.*” 2002, University of California, Santa Barbara. PDF, [https://sbbotanicgarden.org/wp-content/uploads/2022/08/Washburn\\_et-al-2002-SB\\_Channel\\_surface\\_circulation.pdf](https://sbbotanicgarden.org/wp-content/uploads/2022/08/Washburn_et-al-2002-SB_Channel_surface_circulation.pdf)

## APPENDICES

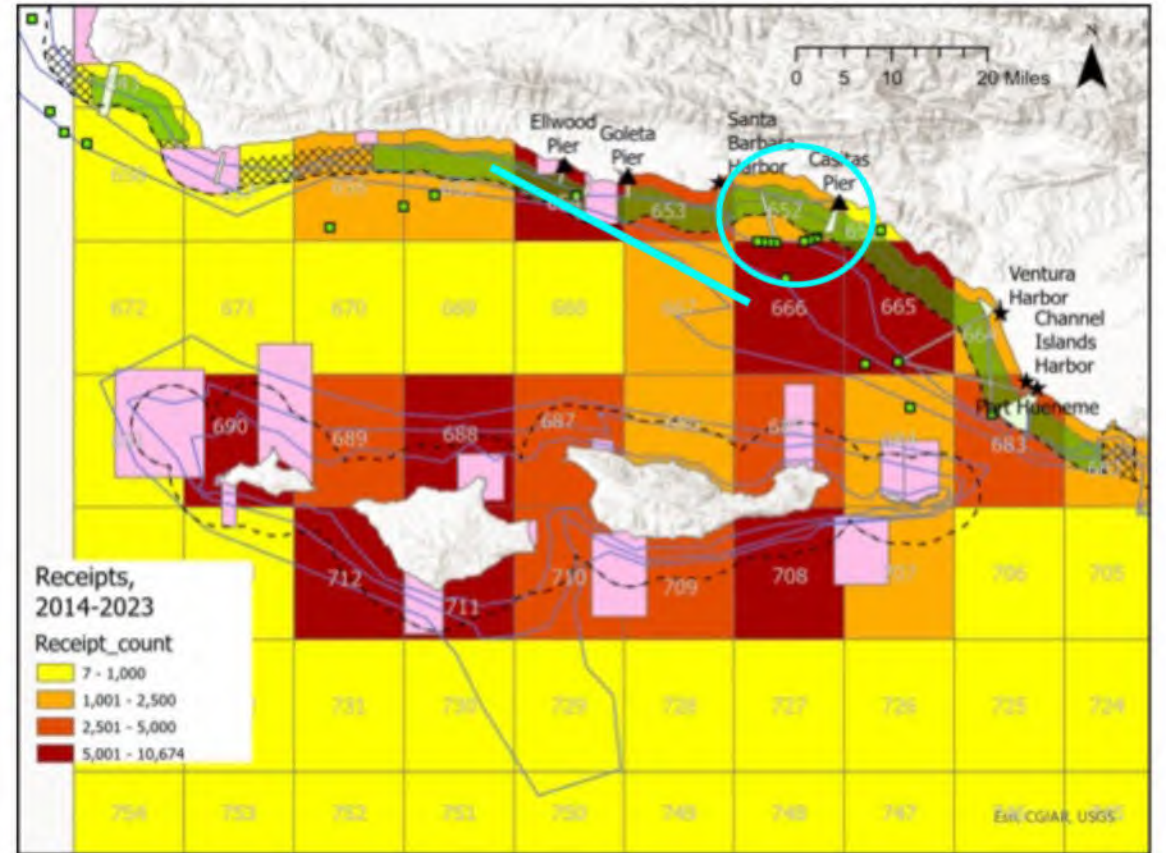
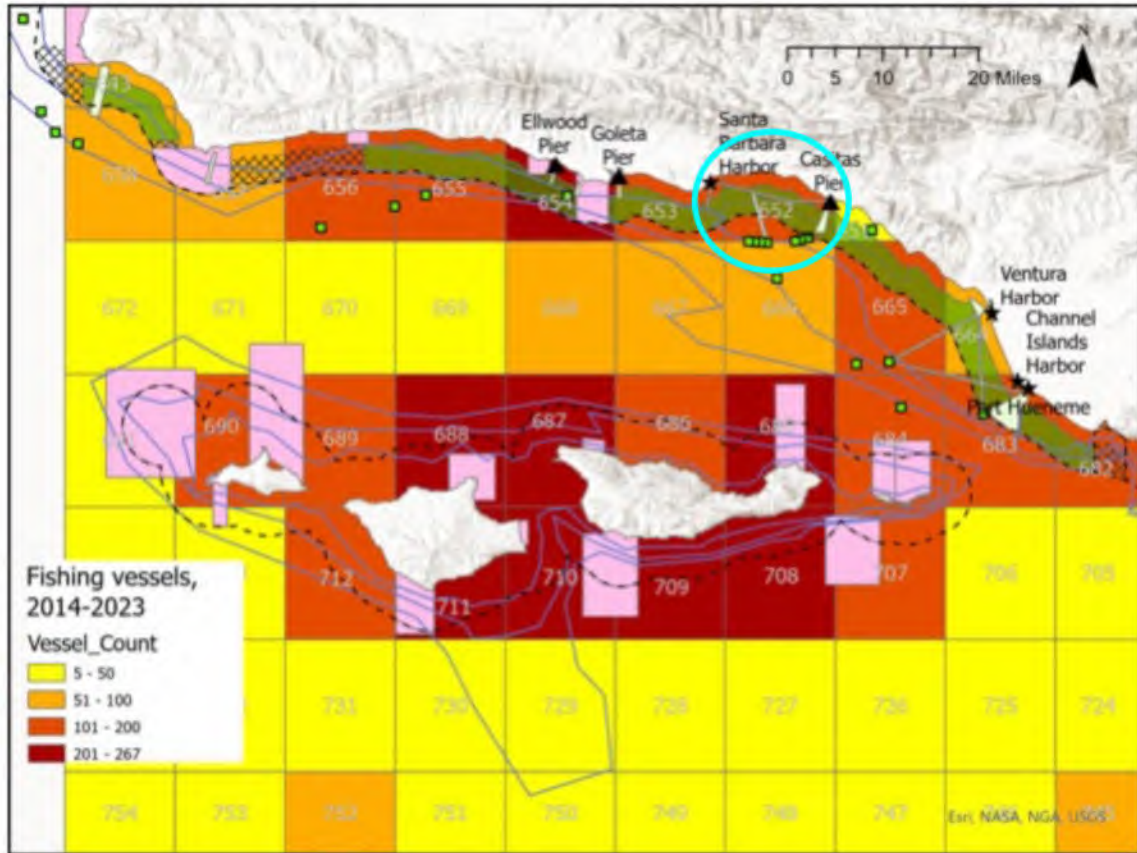
### 1. CDFW DATA

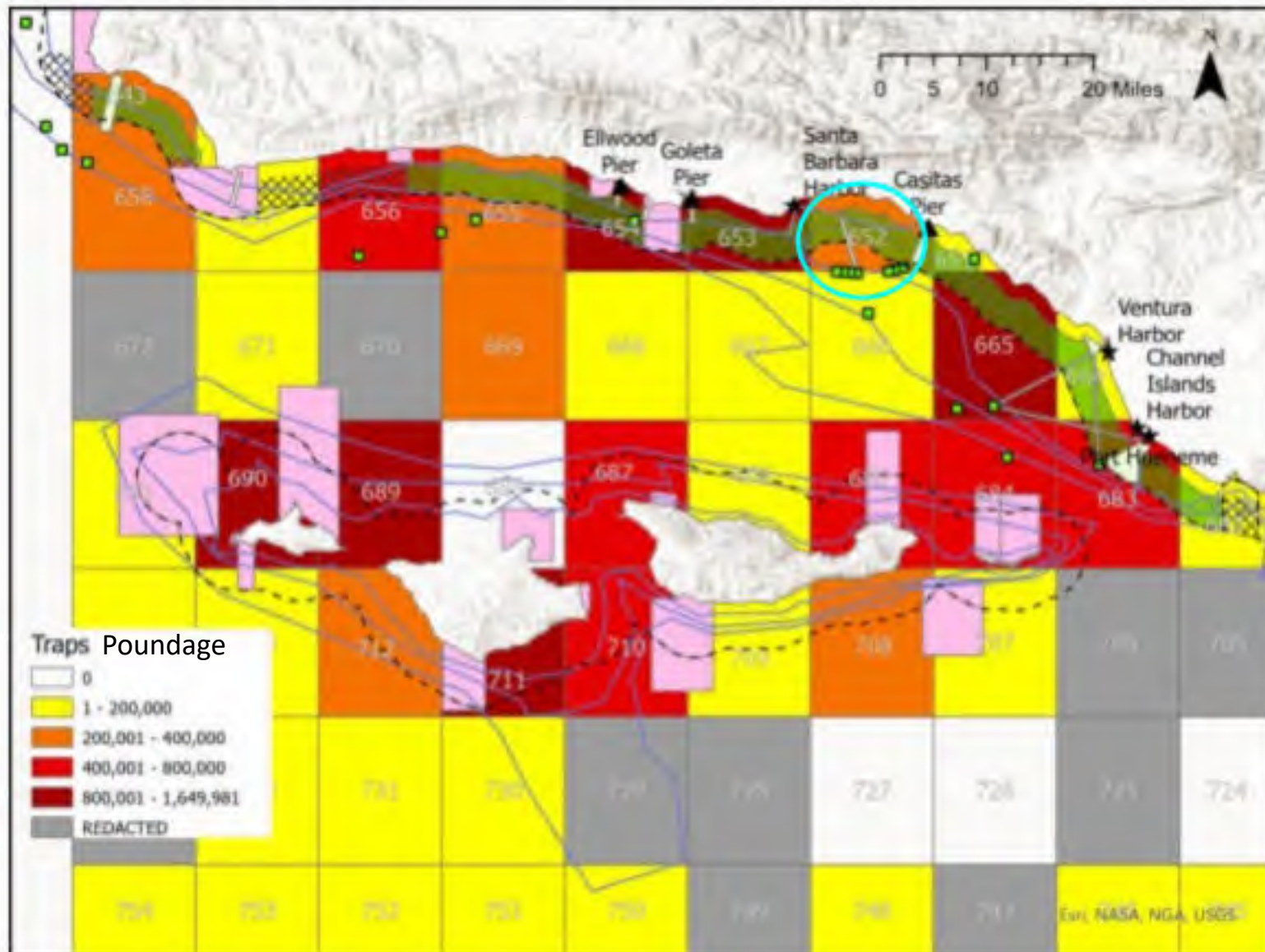
### 2. SEASKETCH METHODS

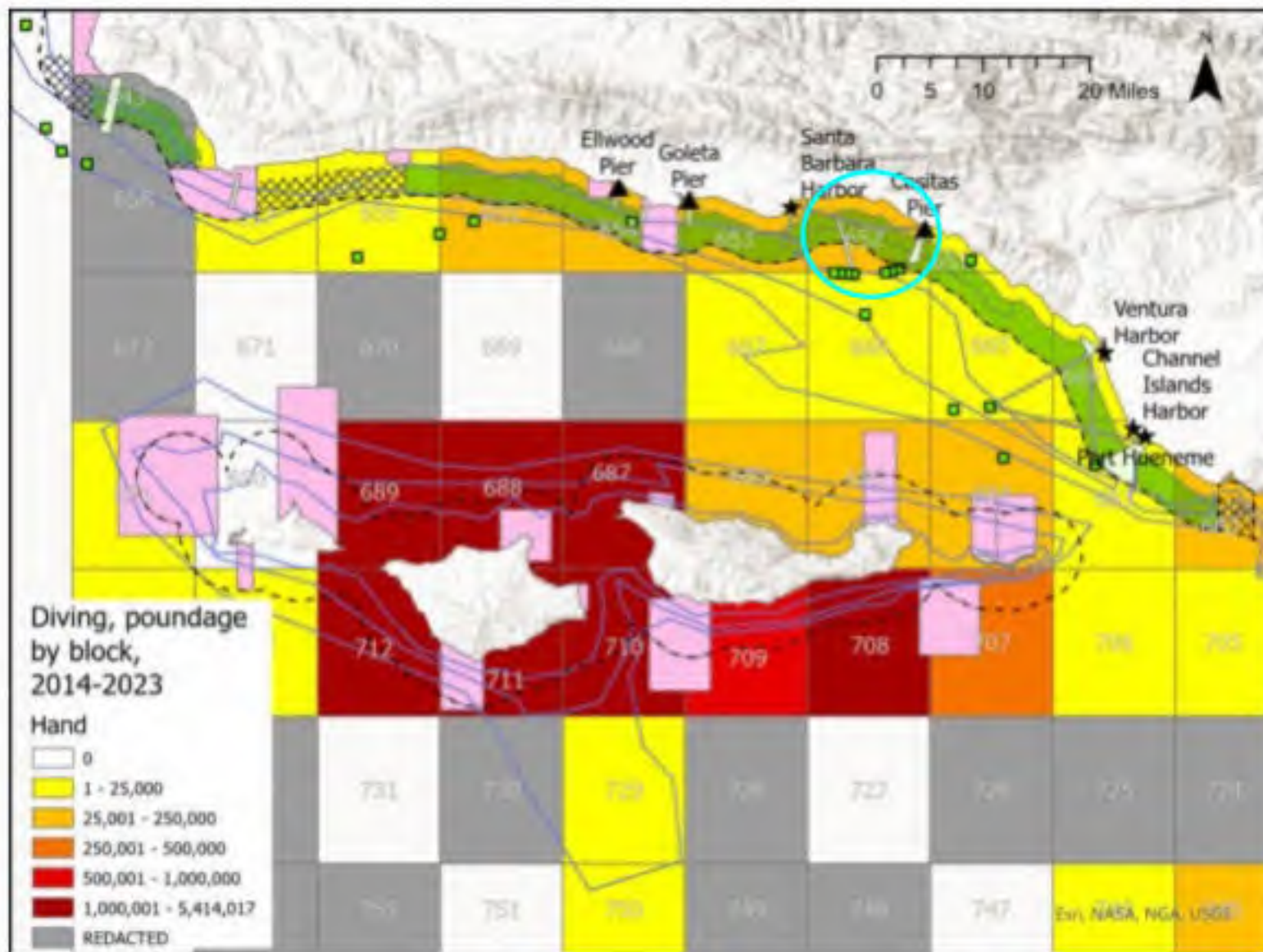
Data Compiled from CDFW records  
by Mary Nishimoto, Ph.D.  
shared with CFSB May 21, 2024

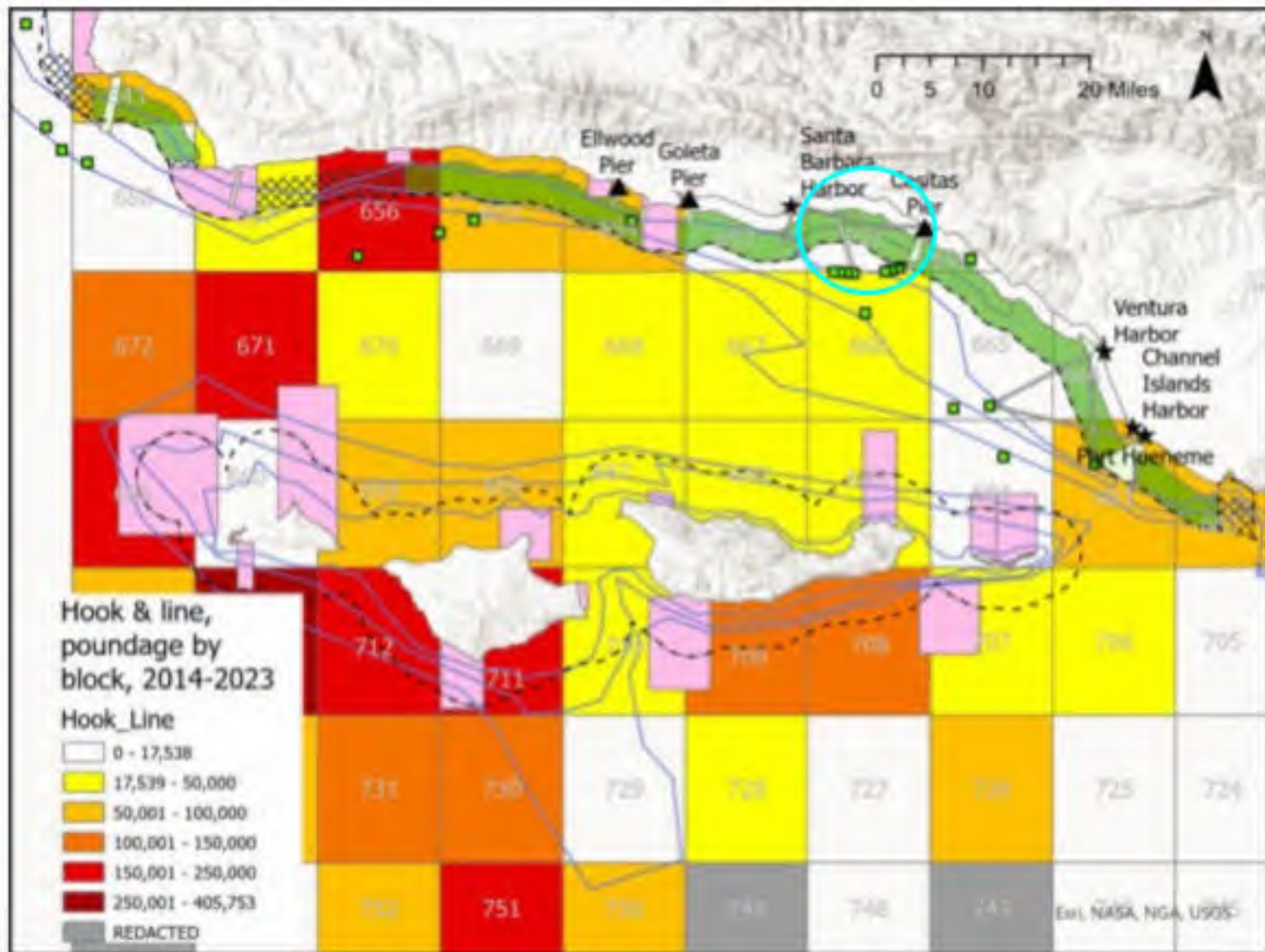
Blue circles added to highlight Block 652

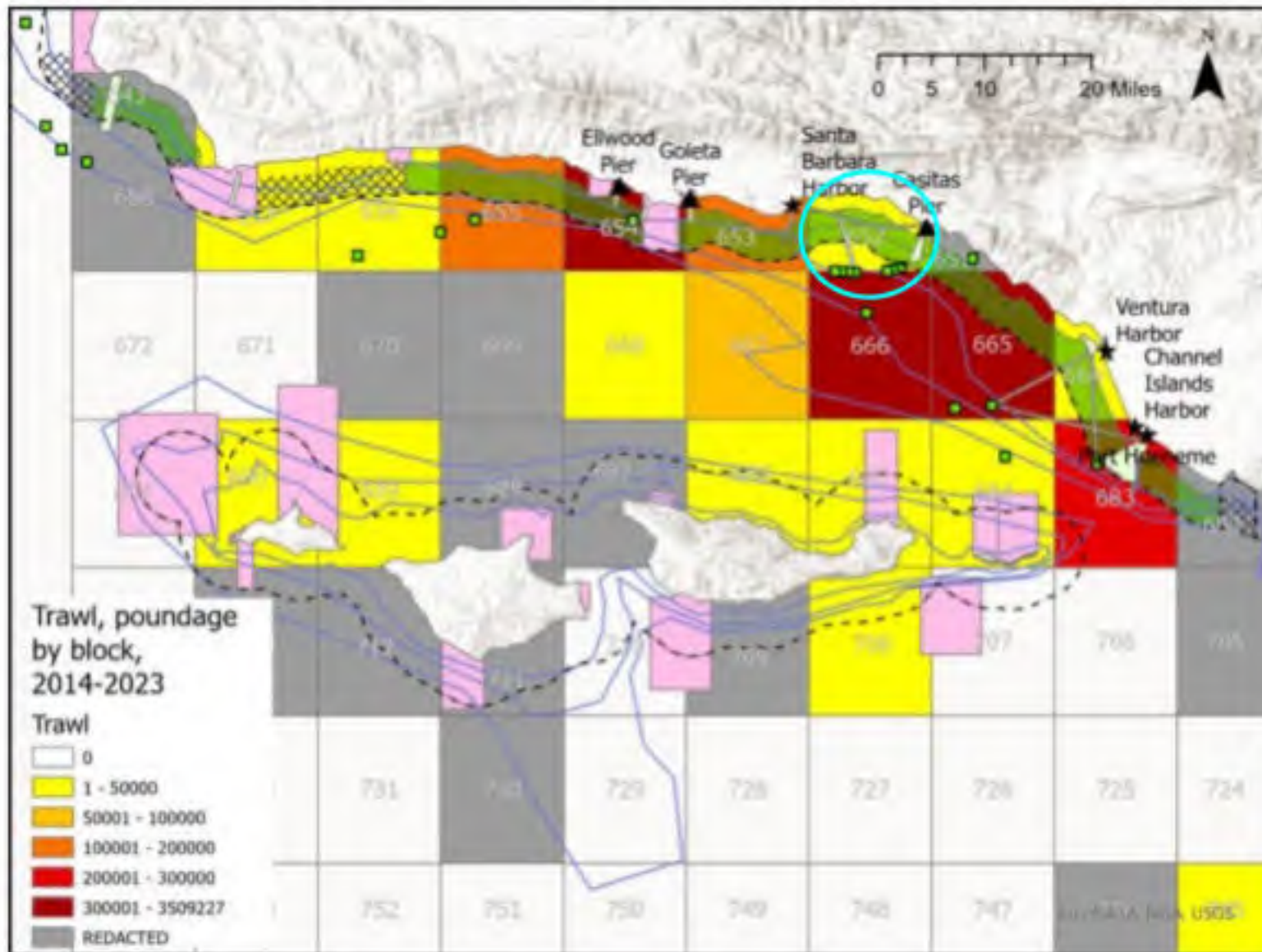
# 296 vessels landed catch in Santa Barbara port area in 2023

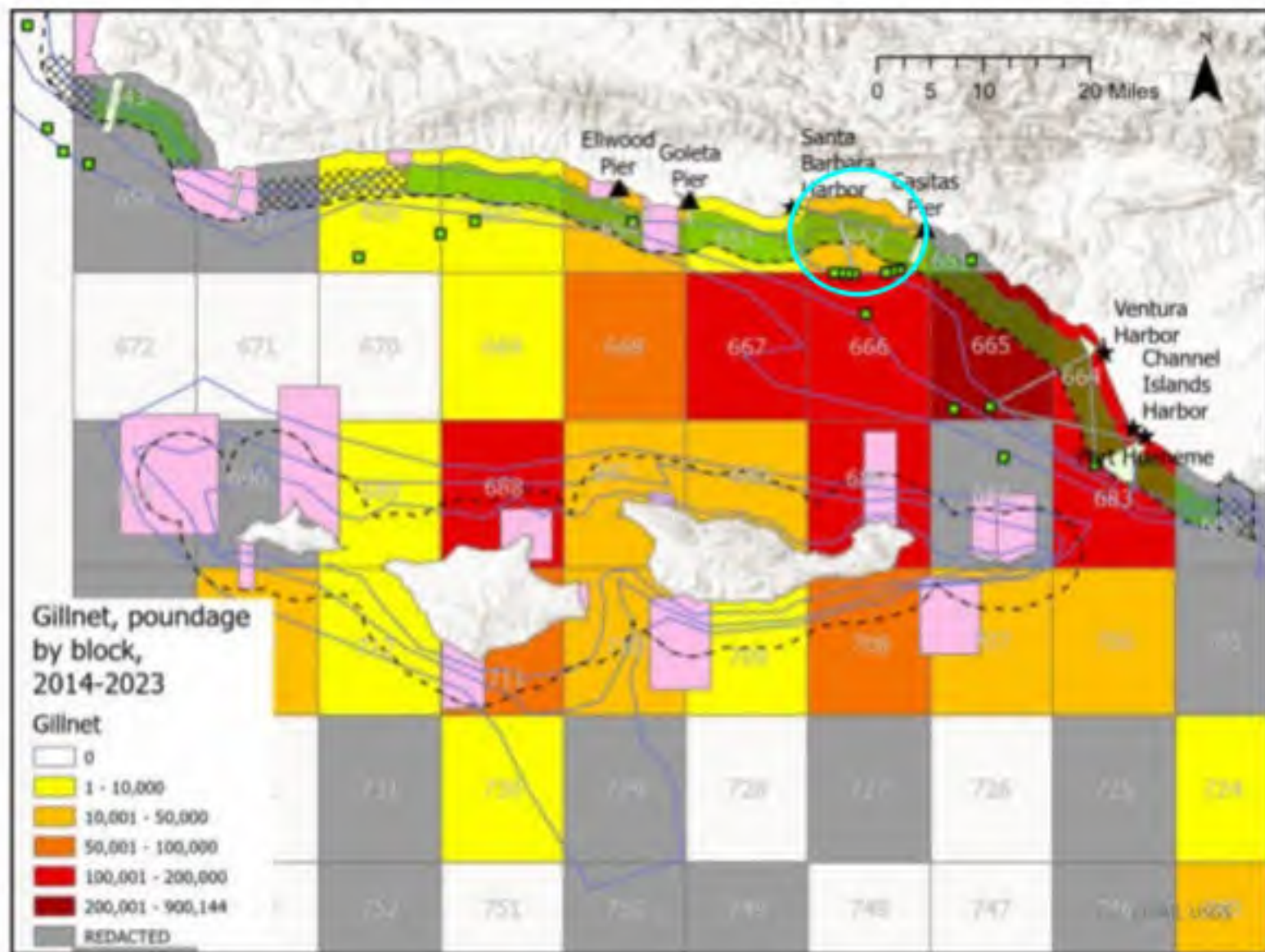












SB Port Area ranked #1 in 2023 for vessel count

Port Area	Vessel Count	Fisher Count	Business Count	Landing Receipt Count
Santa Barbara	296 (20.9%)	331 (22.5%)	117 (23.3%)	8577 (22.4%)
All Port Areas	1417	1472	502	38251

SB Port Area ranked #2 in 2023 for poundage

Port Area	Pounds	% Pounds	Value	% Value
Santa Barbara	23,362,611	20.9%	\$ 35,148,796	21.8%
Total, California	111,586,240		\$ 161,221,551	

*Number of commercial fishing vessels, fishers, and businesses reported on landing receipts from ports in the Santa Barbara Port Area\* and the percentage of the total from the port area in 2023.*

Port	Vessels		Fishers		Businesses		Receipts	
Santa Barbara Harbor	155	(52.4%)	175	(52.9%)	68	(58.1%)	4260	(49.7%)
Oxnard/Channel Islands Harbor	98	(33.1%)	112	(33.8%)	54	(46.2%)	2269	(26.5%)
Ventura Harbor	88	(29.7%)	97	(29.3%)	45	(38.5%)	1816	(21.2%)
Port Hueneme	21	(7.1%)	23	(6.9%)	10	(8.5%)	229	(2.7%)
Port Area Total	296		331		117		8577	

*Volume and ex-vessel value of species landed in ports of the Santa Barbara Port Area in 2023.  
The value of each of the listed species landed in a port was \$200,000 or greater.*

<b>Port:</b>			<b>% Total</b>	<b>% Total</b>
<b>Species</b>	<b>Pounds</b>	<b>Value</b>	<b>Pounds</b>	<b>Value</b>
<i>Santa Barbara Harbor:</i>				
Lobster, California spiny	308,118	\$6,083,039	15.2%	48.6%
Sea urchin, red	799,178	\$2,955,788	39.5%	23.6%
Crab, yellow rock	171,770	\$444,900	8.5%	3.6%
Sablefish	141,701	\$437,221	7.0%	3.5%
Rockfish, vermilion	107,392	\$403,812	5.3%	3.2%
Halibut, California	66,144	\$394,001	3.3%	3.1%
Prawn, spot	18,888	\$369,819	0.9%	3.0%
Crab, red rock	180,900	\$363,925	8.9%	2.9%
Thornyhead, shortspine	25,109	\$281,859	1.2%	2.3%
Sea cucumber, giant red	37,659	\$232,588	1.9%	1.9%
Additional species (93)	164,398	\$543,764	8.1%	4.3%
<i>Total</i>	<i>2,021,257</i>	<i>\$12,510,716</i>		

# CFSB SeaSketch Mapping Project: Methodology Report

June 2024

Madeline Berger

## Data Collection

Data was collected using the SeaSketch tool, via in-person or Zoom interviews with Santa Barbara fishermen. Ava Shulenberg conducted facilitated interviews with each respondent and operated the SeaSketch tool following guidance from the survey respondent. Respondents were identified via targeted outreach to the Santa Barbara and Ventura commercial fishing communities.

The survey consisted of a map on which respondents were asked to draw shapes representing oceans areas valuable for either boat transit or for commercial fishing. Respondents then assigned a numeric value to each shape, with higher numbers representing more valuable areas. Respondents were also asked to specify which gear types and which species were fished within the given shapes.

## Analysis

Raw survey data was downloaded from SeaSketch and then cleaned using R statistical software<sup>1</sup>. All identifying information about respondents, such as names, were removed and non-spatial demographic information about respondents, including age and home harbor, were combined and summarized. Spatial data was cleaned and prepped for the heatmap tool by:

1. Normalizing the value assigned to each shape drawn by one a single respondent to a scale of 0 - 100
2. removing MPA areas from the shapes
3. clipping the shapes to the AOI, which is shown in Figure 1
4. making sure all shapes were valid geometries.

Shapes were also sorted into gear and species-specific datasets. We also made 3 extra commercial fishing datasets that omitted diving, trapping, and both. This resulted in 55 feature classes (Appendix A), one for all boat transit, one for all commercial fishing, and the rest gear and species-specific. Each feature class was then saved as individual shapefiles.

Shapefiles were then input into the open-source [heatmap python tool](#) created by Tim Welch. This tool represents an implementation of the methodology outlined in Yates and Shoeman (2013)<sup>2</sup>, where the value of each shape is divided by the area of the shape in meters, and values of overlapping shapes are summed and gridded into heatmap rasters. Separate heatmaps were created for all boat transit shapes, all commercial fishing shapes and shapes for each species and gear type option in the survey.

After creating rasterized heatmaps using the heatmap tool, the rasters underwent final cleaning and refining by removing any areas that overlapped with the coast before being symbolized for final mapping.



**Figure 1:** Map indicating AOI for this project. To ensure focus on the SB channel was maintained, all shapes were cropped to this AOI before creating rasters. The original data remains intact, under ownership of CFSB, in case there is a need to create future maps with a wider scope.

## Survey Results

In 2023, 53 individuals completed the SeaSketch survey, with 52 drawing shapes indicating valued areas for both commercial fishing and boat transit and 1 drawing shapes for just boat transit.

Respondents were all male and ranged in age from 21 to 78 years of age, with an average age of 51. Table 1 provides the number of fishers interviewed from each landing harbor. 27 of all fishers interviewed, or 50%, indicated that they either currently, or expect in the future to, fish past Point Mugu (i.e. further south than the AOI for this project).

The survey respondents indicated that they used a wide variety of gear types and targeted many different species in the Santa Barbara Channel. Appendices 2 and 3 provide the number of respondents for each gear and species choice provided on the SeaSketch survey.

**Table 1:** Survey Respondents per Landing Harbor

Landing Harbor	Respondents
Santa Barbara	35
Ventura	8
Channel Islands	10

### Maps

Below are still images of the cumulative maps. These maps are 100 x 100 meter rasters symbolized using a linear interpolation between the 1st and 99th percentile of values. All values outside these percentiles (i.e. extreme high or low outliers) are grouped into the end color bins. Outliers were further trimmed from these maps by excluding any values with more than 16 bits.

Maps are available by request at [info@cfsb.info](mailto:info@cfsb.info).

## Worked Cited

1. R Core Team (2021). R: A language and environment for statistical computing. R Foundation for Statistical Computing, Vienna, Austria.<https://www.R-project.org/>.
2. Yates KL, Schoeman DS (2013) Spatial Access Priority Mapping (SAPM) with Fishers: A Quantitative GIS Method for Participatory Planning. PLoS ONE 8(7): e68424. <https://doi.org/10.1371/journal.pone.0068424>

## Appendix

### A: Datasets created

A shapefile and raster were created for each of the following sectors, species fished and gear types used:

Sector / Activity Type (5)	Species (37)	Gear (13)
Commercial Fishing (all gear types) Commercial Fishing - omitting diving Commercial Fishing - omitting trapping Commercial Fishing - omitting diving and trapping Boat Transit	<i>Angel Shark</i> <i>Albacore</i> <i>Black cod</i> <i>Bonito</i> <i>Box Crab</i> <i>Dorado</i> <i>Halibut</i> <i>Kelp</i> <i>Kellet's Whelk</i> <i>Ling cod</i> <i>Lobster</i> <i>Louvar</i> <i>Mackerel/ sardines / anchovies</i> <i>Ocean Whitefish</i> <i>Octopus</i> <i>Opah</i> <i>Pelagic Shark</i> <i>Ridgeback shrimp</i> <i>Rock Crab</i> <i>Rockfish</i> <i>Salmon</i> <i>Sand Dab</i> <i>Sea Cucumber</i> <i>Sheephead</i> <i>Slime Eels</i> <i>Sole</i> <i>Spider Crab</i> <i>Spot Prawn</i> <i>Squid</i> <i>Swordfish</i> <i>Thornyhead</i> <i>Thresher shark</i> <i>Tuna</i> <i>Urchin</i> <i>White Seabass</i> <i>Yellowtail</i> <i>Other</i>	Deepset buoy line Deepset longline Dive/Rake/Bag Drag/Troll/Bottom Trawl Drift gillnet Harpoon Hook and Line / Longline Kelp cutter / harvester Lampara nets Purse seine Set gill net Trap Other

## B. Responses per gear type

Fishers could select more than one gear type for each shape they drew, therefore the total respondents for each of these tables exceeds the total number of unique individuals that filled out the survey. Trap was the gear type with the most responses, and lampara nets and kelp cutters / harvesters were selected the least number of times.

	Responses	# of Shapes
kelp cutter / harvester	3	12
lampara nets	3	9
other	4	8
seine	7	30
harpoon	9	22
set gill net	9	24
drift gillnet	10	31
deepset buoy line	12	31
deepset longline	12	33
drag / troll	18	48
dive/rake/bag	22	91
hook and line / longline	29	89
trap	31	96

### C. Responses per species

Fishers could select more than one species fished for each shape they drew, therefore the total respondents for each of these tables exceeds the total number of unique individuals that filled out the survey. The species most frequently selected was halibut, while the species with the fewest responses was louvar.

	Responses	# of Shapes
albacore	5	7
angel shark	12	29
black cod	12	27
bonito	8	16
box crab	9	24
dorado	5	6
halibut	38	101
kellet's whelk	11	29
kelp	5	17
lingcod	17	38
lobster	24	72
louvar	1	2
mackerel/ sardines / anchovies	18	52
ocean whitefish	25	68
octopus	3	6
opah	2	3
other	16	31
pelagic shark	13	35
ridgeback shrimp	10	26
rock crab	26	65
rockfish	32	84
salmon	13	24
sand dab	15	35
sea cucumber	14	49
sheephead	16	39
slime eels	3	4
sole	9	18
spider crab	11	25
spot prawn	9	26
squid	14	46
swordfish	15	30
thornyhead	11	21
thresher shark	15	34
tuna	19	40
urchin	21	80
white seabass	33	84
yellowtail	29	73



February 23, 2026

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

**RE: Opposition to Petition 2023-33MPA-AM1 — Proposed MPA Expansions in the Santa Barbara Channel and Northern Channel Islands**

Dear Commissioners:

Commercial Fishermen of Santa Barbara (CFSB) respectfully submits this letter in opposition to Petition 2023-33MPA-AM1.

For over 40 years, Commercial Fishermen of Santa Barbara (“CFSB”), a 501(c)3 non-profit organization, has been committed to making our local fishing community resilient and effective by providing healthy, high-quality seafood to local and global markets, ensuring the economic and biological sustainability of fisheries, and maintaining California's fishing heritage. CFSB currently has over 80 members. We represent the interests of a diverse set of fishermen, shellfish farmers, and seafood processors and distributors who are leaders in the commercial fishing industry.

While CFSB is fully committed to kelp ecosystem stewardship and actively engages in kelp restoration, we cannot support the proposed closures of fishing grounds proposed in Petition 33.

Our opposition to Petition 33 rests on three fundamental concerns: the scientific rationale for these closures is weak; the proposed MPAs could undermine more effective restoration strategies; and the economic harm to fishing communities would be substantial, long-term, and is inadequately analyzed.

This letter includes newly available data relevant to the proposed closures by Petition 33 in the Santa Barbara Channel in particular, at Point Conception, Santa Rosa Island, Gull Island, and Point Dume, areas which our fishing community especially depends upon.

**I. The Scientific Rationale Does Not Support These Closures**

**The petition is misaligned with the drivers of kelp loss.** The scientific literature is clear that disease epidemics in sea stars, ENSO dynamics, and marine heatwaves are the primary causes of kelp decline. Excluding fishing does nothing to address these factors. At the Northern Channel Islands, urchin barrens—not fishing pressure—are the inhibitor of kelp regrowth, and predators

generally do not feed on nutritionally depleted purple urchins in barrens due to their low caloric content; protecting predators will not resolve the barren state. At the coastal site proposed for new closure (Point Conception), food web dynamics are not evident as drivers of kelp abundance; few urchin barrens are even present on the SB Channel coast (according to urchin divers and abalone restoration divers recently diving there). Other factors, possibly pollution and sedimentation in addition to climatic factors, may be inhibiting kelp on the Gaviota coast. In neither case does the exclusion of fishing address the actual drivers of kelp loss.

**The cited research does not justify new MPAs.** Giraldo-Ospina et al. (2023) recommends three actions: monitoring sites for triggers warranting intervention, defending sites from threats, and studying mechanisms of resistance to marine heatwaves. The first two are better accomplished by preserving access by commercial divers, who cover far more territory than static subtidal transects and can monitor and rapidly mobilize to defend areas through purple urchin harvest. The third is better studied using the existing MPA network rather than establishing new closures that will take years to yield data. Notably, the study's identification of high-resilience kelp forests outside current MPA boundaries suggests that fisheries are not impairing kelp resilience to its main stressors. As noted by many other letter-writers, the scientific evidence for causal relationships between MPA protection and kelp resilience or MPA protection and biodiversity metrics in the Carr and Caselle (2021) report is too weak to justify the economic harm that could come from the closures in this petition. Other studies, such as Ovando et al. (2021), demonstrate no net biomass gain was associated with the MPA network in the Channel Islands and explain that in the absence of ongoing over-fishing (which is not occurring here), MPAs do not show broadscale net biodiversity gains.

**The proposed closures extend far beyond kelp habitat.** All but one of the proposed expansions (Gull Island) cover waters well beyond kelp's natural growing depth. The petition offers no rationale for closing deepwater areas to fisheries with no ecological connection to kelp ecosystems.

**Scientific modeling tools exist to guide spatial placement of new area closures** but have not been used. Many of these tools were developed in response to the previous California MPA Network process and should be leveraged if future changes to the MPA Network are warranted. These tools can present alternatives and evaluate trade-offs to simultaneously maximize intended biodiversity protections and minimize negative fishery impacts.

## **II. MPA Designation Could Undermine More Effective Restoration Strategies**

**MPA designation reduces the available toolkit.** Designating these areas as MPAs makes implementation of commercial purple urchin harvest, kelp re-seeding, sea star outplanting, and importantly - future tech-based innovations yet to be developed - more time-consuming and difficult - or impossible - to permit for use in these places. The Ocean Protection Council's strategic plan commits to restoring at least 2,000 acres of kelp forest by 2030, with over \$10 million recently allocated to kelp restoration projects. This substantial state investment in active restoration represents a more cost-effective and scientifically grounded approach than permanent fishery closures—particularly given the weak evidence that these fisheries negatively impact kelp recovery.

**Commercial fishers are the most viable monitoring system.** Subtidal monitoring using research transects covers less than one acre at largely static locations. Commercial divers routinely survey far greater areas and actively track kelp and urchin dynamics. Excluding them from these large areas eliminates the most practical, cost-effective system for detecting conditions that warrant intervention.

**Active restoration is proving effective.** CFSB has partnered with UC Santa Barbara, The Nature Conservancy, and The Bay Foundation to develop and demonstrate fishery-mediated kelp restoration. At a one-acre pilot site in Tyler Bight, San Miguel Island, commercial divers harvested 3,000 pounds of purple urchin between June and September 2025. PISCO-method monitoring at the harvest site and a nearby control site occurred in May 2025, October 2025, and January 2026. Our positive results echo those of TNC and The Bay Foundation in other parts of the State.

The results of our study in Figure 1 below demonstrate that commercial harvest can effectively restore kelp habitat:

- Purple urchin density was reduced (by harvest) to two-thirds, to approximately 35 per square meter in September 2025, and held at that level through January 2026 without further intervention
- Red urchin density remained unchanged—indistinguishable from pre-harvest levels and the control site
- Kelp (*Macrocystis pyrifera*) count increased from fewer than 5 plants pre-harvest to over 35 in October post-harvest
- Total algal count increased from fewer than 20 plants pre-harvest to over 280 in January post-harvest
- The nearby control site showed near-zero algal counts throughout the monitoring period, suggesting that kelp recovery at the harvest site benefited from the intervention



Figure 1. Results of CFSB’s purple urchin removal pilot project at Tyler Bight in San Miguel Island that harvested 3,000 lbs of purple urchin in 1 acre. Data collected, analyzed and displayed by the Caselle Lab at UCSB.

We are simultaneously developing cost-effective market demand for harvested purple urchin to ensure this approach is economically sustainable at scale. The proposed MPAs would restrict our community's ability to expand these demonstrated strategies to other island and coastal sites in the Channel.

### **III. The Economic Harm Would Be Substantial and Inadequately Analyzed**

**The petition's economic analysis is insufficient.** The assertion that these closures represent merely "short-term impacts" that will be "outweighed by larger benefits in the future" is unsupported. The Coastal Fishing Communities Policy would suggest that a transparent, structured stakeholder engagement process and economic analysis of each proposed closure is required. This analysis must consider the full economic contribution of fisheries to coastal economies and must be predicated on place-based science using best-available science.

**Spillover assumptions do not apply uniformly.** The petition relies heavily on Lenihan et al. (2021), but lobster exhibits spillover dynamics that many other affected fisheries do not—particularly the sea urchin fishery, which is critical to our working waterfronts. The claim that "regional and statewide fishery landings and values do not appear to have been negatively impacted by MPAs" cannot be extrapolated here; these analyses must be conducted fishery by fishery and region by region for these specific proposed closures.

**Displacement creates documented harm.** These closures cannot rationally be characterized as short-term impacts. Displacement will create long-term fisheries compaction with documented negative ecological effects. As an example, Petition 2023-27MPA-AM1 regarding lobster fishing impacts on eelgrass at Frenchy's Cove, Anacapa Island, describes habitat impacts that began only after coastal MPAs forced fleet relocation. Compressing fisheries into crowded, suboptimal grounds reduces catch per unit effort and may intensify habitat impacts outside MPAs.

**These grounds have irreplaceable value.** CFSB conducted a Seasketch spatial assessment in 2023-2024 with 53 commercial fishers across three ports, funded by the ARPA-E MARINER program and analyzed by UCSB's Seasketch lab. The results show that the proposed closure areas rank among the highest-value (dark red, in Figure 2 below) for fishing grounds in the Santa Barbara Channel for multiple gear types, many of which have no scientific rationale for negative influence on kelp:

- **South Point, Santa Rosa Island:** Diving, Deep Set Buoy, Deep Set Longline, Harpoon, Lampara
- **Point Conception:** Deep Set Buoy, Deep Set Longline, Traps, Hook and Line, Kelp Cutting, Seine Net
- **Gull Island:** Diving, Traps, Deep Set Buoy, Deep Set Longline, Harpoon, Lampara, Hook and Line, Seine Net
- **Point Dume:** Diving, Hook and Line, Seine Net

Fishers invest decades learning to harvest strategically, sustainably and safely from specific grounds given weather, currents, tides, seasons, topography and ecology. As one urchin diver

stated, closing this area "is akin to taking away my college degree"—years of accumulated knowledge that cannot simply be transferred elsewhere.

**Port viability is at stake.** These closures threaten functional port economies reliant on commercial fishing, potentially pushing our ports below the minimum viable threshold needed to support fishing community resilience—including fully utilized shoreside infrastructure, intergenerational knowledge transmission, and local supply chains. This directly threatens California's food production capacity and the food security of our coastal communities. Santa Barbara was the State's top producing region in 2023, partly due to the declining rankings of other ports historically strong in Salmo and Dungeness. Hampering Santa Barbara is a nail in the coffin of wild, local and sustainable fisheries for the State.

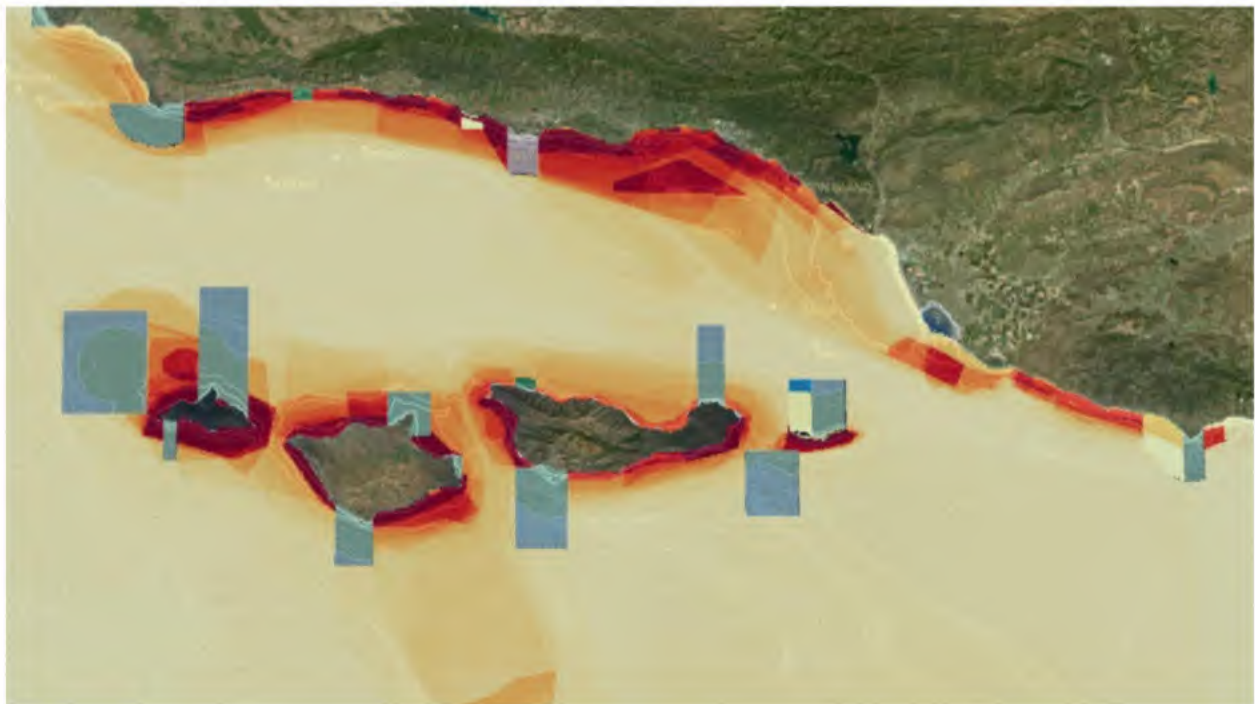


Figure 2. Composite Seasketch heatmap showing the value of fishing grounds in the Santa Barbara Channel to 53 fishers based in SB and Ventura. Note that biases are possible, especially at the coastal margins, where fishers from other ports may more highly value grounds than the respondents. See appendix for more study information.

## Conclusion and Request

CFSB urges the Commission to deny Petition 2023-33MPA-AM1. The scientific rationale for these closures is insufficient - for all fisheries but particularly for fisheries that do not target kelp forest species. The proposed MPAs would restrict proven restoration strategies while imposing substantial, long-term economic harm on fishing communities that has not been adequately analyzed as required by the Coastal Fishing Communities Policy.

We recognize that many who support this petition share our commitment to kelp forest health. However, well-intentioned support cannot substitute for rigorous, site-specific analysis. The areas proposed for closure were not selected based on evidence that fishing is driving kelp loss at those sites, nor with adequate consideration of the impacts on fishing communities who depend on them.

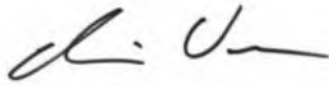
If the Commission seeks new kelp protection measures, we respectfully request that any action:

1. Require rigorous, site-specific analysis of the proximate causes of kelp loss and the actual influence of each affected fishery
2. Conduct a full economic cost-benefit analysis in line with the Coastal Fishing Communities Policy
3. Exclude urchin fisheries from any restrictions, given that they target a kelp suppressor
4. Exclude fisheries with no connection to kelp forest dynamics, including pelagic and deepwater fisheries
5. Prioritize investment in active restoration strategies that have demonstrated effectiveness

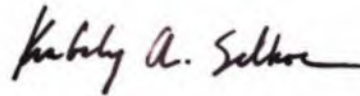
We appreciate the Commission's consideration of these concerns and welcome discussion.

Respectfully,

**Commercial Fishermen of Santa Barbara**



Chris Voss, President



Kim Selkoe, Executive Director

Appendix: Seasketch Methodology Report

# CFSB SeaSketch Mapping Project: Methodology Report

June 2024

Madeline Berger

## Data Collection

Data was collected using the SeaSketch tool, via in-person or Zoom interviews with Santa Barbara fishermen. Ava Shulenberg conducted facilitated interviews with each respondent and operated the SeaSketch tool following guidance from the survey respondent. Respondents were identified via targeted outreach to the Santa Barbara and Ventura commercial fishing communities.

The survey consisted of a map on which respondents were asked to draw shapes representing oceans areas valuable for either boat transit or for commercial fishing. Respondents then assigned a numeric value to each shape, with higher numbers representing more valuable areas. Respondents were also asked to specify which gear types and which species were fished within the given shapes.

## Analysis

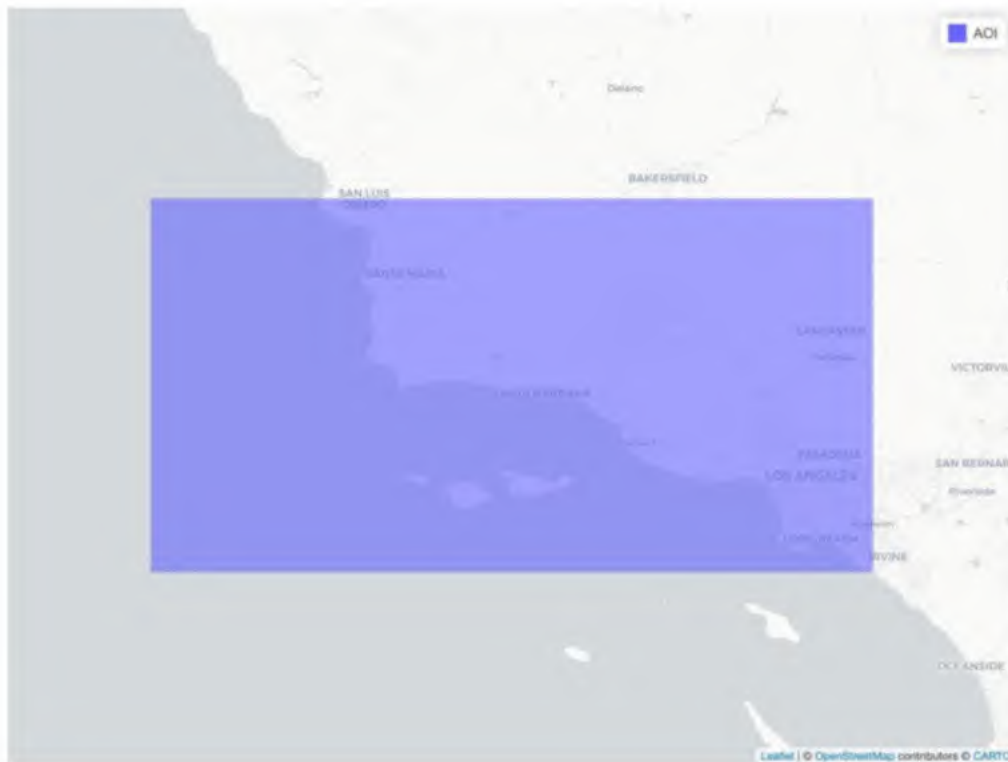
Raw survey data was downloaded from SeaSketch and then cleaned using R statistical software<sup>1</sup>. All identifying information about respondents, such as names, were removed and non-spatial demographic information about respondents, including age and home harbor, were combined and summarized. Spatial data was cleaned and prepped for the heatmap tool by:

1. Normalizing the value assigned to each shape drawn by one a single respondent to a scale of 0 - 100
2. removing MPA areas from the shapes
3. clipping the shapes to the AOI, which is shown in Figure 1
4. making sure all shapes were valid geometries.

Shapes were also sorted into gear and species-specific datasets. We also made 3 extra commercial fishing datasets that omitted diving, trapping, and both. This resulted in 55 feature classes (Appendix A), one for all boat transit, one for all commercial fishing, and the rest gear and species-specific. Each feature class was then saved as individual shapefiles.

Shapefiles were then input into the open-source [heatmap python tool](#) created by Tim Welch. This tool represents an implementation of the methodology outlined in Yates and Shoeman (2013)<sup>2</sup>, where the value of each shape is divided by the area of the shape in meters, and values of overlapping shapes are summed and gridded into heatmap rasters. Separate heatmaps were created for all boat transit shapes, all commercial fishing shapes and shapes for each species and gear type option in the survey.

After creating rasterized heatmaps using the heatmap tool, the rasters underwent final cleaning and refining by removing any areas that overlapped with the coast before being symbolized for final mapping.



**Figure 1:** Map indicating AOI for this project. To ensure focus on the SB channel was maintained, all shapes were cropped to this AOI before creating rasters. The original data remains intact, under ownership of CFSB, in case there is a need to create future maps with a wider scope.

## Survey Results

In 2023, 53 individuals completed the SeaSketch survey, with 52 drawing shapes indicating valued areas for both commercial fishing and boat transit and 1 drawing shapes for just boat transit.

Respondents were all male and ranged in age from 21 to 78 years of age, with an average age of 51. Table 1 provides the number of fishers interviewed from each landing harbor. 27 of all fishers interviewed, or 50%, indicated that they either currently, or expect in the future to, fish past Point Mugu (i.e. further south than the AOI for this project).

The survey respondents indicated that they used a wide variety of gear types and targeted many different species in the Santa Barbara Channel. Appendices 2 and 3 provide the number of respondents for each gear and species choice provided on the SeaSketch survey.

**Table 1:** Survey Respondents per Landing Harbor

Landing Harbor	Respondents
Santa Barbara	35
Ventura	8
Channel Islands	10

### Maps

Below are still images of the cumulative maps. These maps are 100 x 100 meter rasters symbolized using a linear interpolation between the 1st and 99th percentile of values. All values outside these percentiles (i.e. extreme high or low outliers) are grouped into the end color bins. Outliers were further trimmed from these maps by excluding any values with more than 16 bits.

## Worked Cited

1. R Core Team (2021). R: A language and environment for statistical computing. R Foundation for Statistical Computing, Vienna, Austria.<https://www.R-project.org/>.
2. Yates KL, Schoeman DS (2013) Spatial Access Priority Mapping (SAPM) with Fishers: A Quantitative GIS Method for Participatory Planning. PLoS ONE 8(7): e68424. <https://doi.org/10.1371/journal.pone.0068424>

## Appendix

### A: Datasets created

A shapefile and raster were created for each of the following sectors, species fished and gear types used:

Sector / Activity Type (5)	Species (37)	Gear (13)
Commercial Fishing (all gear types) Commercial Fishing - omitting diving Commercial Fishing - omitting trapping Commercial Fishing - omitting diving and trapping Boat Transit	<i>Angel Shark</i> <i>Albacore</i> <i>Black cod</i> <i>Bonito</i> <i>Box Crab</i> <i>Dorado</i> <i>Halibut</i> <i>Kelp</i> <i>Kellet's Whelk</i> <i>Ling cod</i> <i>Lobster</i> <i>Louvar</i> <i>Mackerel/ sardines / anchovies</i> <i>Ocean Whitefish</i> <i>Octopus</i> <i>Opah</i> <i>Pelagic Shark</i> <i>Ridgeback shrimp</i> <i>Rock Crab</i> <i>Rockfish</i> <i>Salmon</i> <i>Sand Dab</i> <i>Sea Cucumber</i> <i>Sheephead</i> <i>Slime Eels</i> <i>Sole</i> <i>Spider Crab</i> <i>Spot Prawn</i> <i>Squid</i> <i>Swordfish</i> <i>Thornyhead</i> <i>Thresher shark</i> <i>Tuna</i> <i>Urchin</i> <i>White Seabass</i> <i>Yellowtail</i> <i>Other</i>	Deepset buoy line Deepset longline Dive/Rake/Bag Drag/Troll/Bottom Trawl Drift gillnet Harpoon Hook and Line / Longline Kelp cutter / harvester Lampara nets Purse seine Set gill net Trap Other

## B. Responses per gear type

Fishers could select more than one gear type for each shape they drew, therefore the total respondents for each of these tables exceeds the total number of unique individuals that filled out the survey. Trap was the gear type with the most responses, and lampara nets and kelp cutters / harvesters were selected the least number of times.

	Responses	# of Shapes
kelp cutter / harvester	3	12
lampara nets	3	9
other	4	8
seine	7	30
harpoon	9	22
set gill net	9	24
drift gillnet	10	31
deepset buoy line	12	31
deepset longline	12	33
drag / troll	18	48
dive/rake/bag	22	91
hook and line / longline	29	89
trap	31	96

### C. Responses per species

Fishers could select more than one species fished for each shape they drew, therefore the total respondents for each of these tables exceeds the total number of unique individuals that filled out the survey. The species most frequently selected was halibut, while the species with the fewest responses was louvar.

	Responses	# of Shapes
albacore	5	7
angel shark	12	29
black cod	12	27
bonito	8	16
box crab	9	24
dorado	5	6
halibut	38	101
kellet's whelk	11	29
kelp	5	17
lingcod	17	38
lobster	24	72
louvar	1	2
mackerel/ sardines / anchovies	18	52
ocean whitefish	25	68
octopus	3	6
opah	2	3
other	16	31
pelagic shark	13	35
ridgeback shrimp	10	26
rock crab	26	65
rockfish	32	84
salmon	13	24
sand dab	15	35
sea cucumber	14	49
sheephead	16	39
slime eels	3	4
sole	9	18
spider crab	11	25
spot prawn	9	26
squid	14	46
swordfish	15	30
thornyhead	11	21
thresher shark	15	34
tuna	19	40
urchin	21	80
white seabass	33	84
yellowtail	29	73

**From:** Ethan Olsen <[REDACTED]>

**Sent:** Tuesday, February 24, 2026 7:46 AM

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

**Subject:** Reject MPA 2023-29!

Subject: Opposition to Proposed MPA Expansions in Carpinteria and Morro Bay

Dear California Fish and Game Commission,

I am writing to respectfully voice my opposition to the proposed Marine Protected Area expansions affecting the Carpinteria and Morro Bay regions. As a fifth-generation fisherman who has grown up utilizing and respecting California's coastline, I strongly believe these additional restrictions are unnecessary and disproportionately impact responsible recreational anglers and coastal families. I support the CCA's position in rejecting the specific proposals that would further restrict access without clear, science-based justification demonstrating measurable benefit over existing regulations.

Fishing is not just recreation to me, it is heritage and a way of life passed down through generations. Expanding MPAs in these areas would significantly limit public access and further erode sustainable fishing traditions along our coast. I urge the Commission to carefully reconsider these proposals and prioritize balanced, data-driven management that protects marine resources while preserving public access for responsible fishermen.

Respectfully,

**Ethan Olsen**

Colleen Hicks  
[REDACTED]  
Bolinas, CA  
[REDACTED]

October 14, 2025

via email ([fgc@fgc.ca.gov](mailto:fgc@fgc.ca.gov)) & U.S. Mail

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

**Re: Petition for modification of Duxbury Reef Marine Protected Area  
Petition # 2023-32MPA**

Dear President Zavaleta and Honorable Commissioners,

I am writing to you in support of the above-referenced petition submitted to you by the Environmental Action Committee of West Marin ("EAC") to reclassify the Duxbury Reef Marine Protected Area as a State Marine Reserve and to expand its boundaries.

Approximately 6 weeks ago I was approached on the street in Bolinas by people who sat behind a banner representing themselves as a committee To Save Duxbury. They asked for and I readily signed their "petition", which I did not take the time to understand and which is actually opposed to EAC's Petition. I then later learned more of the facts and I realized that in my haste I had erred.

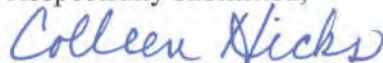
**I hereby retract my agreement to the petition opposing EAC's Petition.**

**I hereby reaffirm, without qualification, my support for EAC's Petition as stated in my letter to the Commission dated January 27, 2024.** (I have enclosed a copy of my January 27, 2024 letter for your convenience.)

I understand that if EAC's Petition is successful, Duxbury Reef will be classified as a State Marine Reserve, all fishing done on the reef itself will be prohibited, fishing from a boat would be prohibited 1000 feet from low low water for the entire extent of the new Marine Protected Area, and the boundaries of the new Marine Protected Area will be extended to the South and North. I support that outcome for the reasons stated in my January 27, 2024 letter.

I apologize for the confusion I may have caused.

Respectfully submitted,



Colleen Hicks

encl.

Colleen Hicks  
P.O. Box 124  
Bolinas, CA

January 27, 2024

via email ([fgc@fgc.ca.gov](mailto:fgc@fgc.ca.gov)) & U.S. Mail

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

**Re: Petition for modification of Duxbury Reef Marine Protected Area**

Dear President Sklar and Honorable Commissioners,

I am writing to you in support of the petition submitted to you by the Environmental Action Committee of West Marin ("EAC") regarding the Duxbury Reef Marine Protected Area.

**My experience/background relevant to this matter.**

I have continuously been a full-time resident of Bolinas for approximately 55 years from 1968 to the present. I am of Cherokee and Lakota lineage. From 2005 to 2017 I was the Executive Director of the Museum Of The American Indian ("MAI") in Novato, California. My duties as Executive Director of the MAI included: creating, planning and curating exhibits, educational programs, educational resources, and live events; writing and editing MAI's newsletter; and, other responsibilities all related to informing the public of the values, culture and history of Indigenous Peoples of Northern California. Those duties all required a knowledge of the past and present practices, culture, values, and interests of Indigenous Peoples of the Americas generally and Indigenous Peoples of Northern California more specifically. The museum had over 4,000 school children visit every year to learn about native life ways, which included respect and care for the Earth. We taught the school children that it is our duty to preserve the land for future generations as we were taught by our ancestors.

During my 55 years in Bolinas I have spent literally 1,000s of hours on Duxbury Reef, including on the northern portion of the current Duxbury Reef Marine Protected Area that comprises the shoreline of the former RCA broadcasting facility (now occupied by Commonweal).

For the reasons stated below, I strongly believe that in order to preserve unimpaired the ecosystem of Duxbury Reef for the enjoyment, education and inspiration of current and future generations and to minimize the negative impacts of visitors to Duxbury Reef's intertidal habitat and species all three of the following additions to and modifications of the Duxbury Reef State Marine Conservation Area ("SMCA") which EAC has requested should be approved by the Commission.

I believe that designating the entirety of Duxbury Reef, including both the "Northern

and Southern Reef Extensions”, as a State Marine Reserve is consistent with and will promote the interests and values of Indigenous Peoples of Northern California, and will not negatively impact that community.

**1. Change the designation of the Duxbury Reef State Marine Conservation Area to a “State Marine Reserve”.**

Designating as a State Marine Reserve the entirety of the both the current Duxbury MPA and the Duxbury MPA expanded to the North and South as requested by EAC, is imperative. I understand that a designation of Duxbury Reef as a “State Marine Reserve” will prohibit all taking (including all fishing from shore), damage, injury or possession of any living, geological or cultural marine resource, except under a scientific collecting permit for authorized research, restoration or monitoring, whereas in Duxbury’s current designation as a State Marine Conservation Area fishing from shore is permitted and some species are unprotected. The designation of the entirety of Duxbury Reef as a State Marine Reserve is consistent with and will promote the interests and values of Indigenous Peoples of Northern California, and will not negatively impact that community.

I have observed that fishing from the shore has become less frequent over the years. It still occurs but I do not recall seeing any people who made return trips to Duxbury for shore fishing in the past 6 or so years. I believe that such a change would only improve the condition of the reef, in some part by the reduction of that now-allowed taking, but also because of the effect that observing that fishing probably has on the behavior of the recreational, non-fishing visitors.

I have observed that the number of recreational visitors to the Duxbury MPA dramatically increased beginning in 2017. It is my impression that the increase in average visitation to Duxbury Reef in the past 6 years is far larger than the increase in the average visitation during any other 6-year period during the 49 years preceding 2017. The time for increasing the protection of Duxbury Reef is now.

**2. Extend the southern boundary of the Duxbury Marine Protected Area to the most southerly tip of Duxbury Reef exposed at mean lower low water (the “Southern Reef Extension”) and designate the entire Reef as a State Marine Reserve**

I understand that at this time the Southern Reef Extension is outside of and unprotected by the current SMCA. I understand that this unprotected area constitutes about 5/6's of that portion of Duxbury Reef extending off the southern tip of the Bolinas peninsula.

I have wandered out into the intertidal area of the southernmost part of the reef from time to time, simply for the pleasure of being there. It is truly an uncommon biological wonderland. I do not recall that I have ever observed any shore-based fishing occurring on the Southern Reef Extension. This part of the reef should be included in the expanded boundaries of a Duxbury Reef State Marine Reserve.

**3. Extend the northern boundary of the Duxbury MPA to the Double Point/Stormy Stack Special Closure, that is the northern point of the area known as Double Point (the "Northern Reef Extension") and designate the entire Reef as a State Marine Reserve**

I understand that the Northern Reef Extension is outside of and unprotected by the current SMCA. It is my understanding that this unprotected area commences at the North boundary of the current SMCA, roughly at the outfall of Arroyo Hondo Creek, and would extend to the northern point of Double Point.

I am not aware of anyone fishing from shore, either recreationally or commercially, in the area of the Northern Reef Extension.

I have also explored the intertidal area of the Northern Reef Extension from time to time. It is pristine and rich with many species. It makes no sense to me that this and the Southern Reef Extension, both fragile ecological areas, have not been included in the Duxbury Reef Marine Protected Area. Both should now be included in an expanded State Marine Reserve.

**Summary**

In order to preserve without further impairment, and to correct harm that has been previously done to, the intertidal ecosystem of Duxbury Reef for the enjoyment, education and inspiration of current and future generations all three of the above-described additions to and modifications of the Duxbury Reef State Marine Conservation Area proposed by EAC should be approved by the Commission.

Respectfully submitted,



Colleen Hicks

cc. Kent Khtikian

COLLEEN HICKS

BOLINAS CA

SAN FRANCISCO CA 940

14 OCT 2025 PM 3 L



CALIFORNIA FISH & GAME COMMISSION

P.O. BOX 944209

SACRAMENTO, CA 94244-2090

94244-2090



**From:** Ashley Eagle-Gibbs <[REDACTED]>  
**Sent:** Wednesday, February 11, 2026 2:59 PM  
**To:** FGC <FGC@fgc.ca.gov>; Eric Sklar <[REDACTED]>; Erika Zavaleta <[REDACTED]>; Samantha Murray <[REDACTED]>; [REDACTED] Commissioner Anderson <[REDACTED]>  
**Cc:** Ashcraft, Susan@FGC <[REDACTED]>; Isabel Dawson <[REDACTED]>  
**Subject:** FGC Comments Agenda Item 9C from EAC

Dear Commissioners,

I am sharing a copy of my full testimony, as I did not anticipate only having one minute to speak today.

Thank you,

Ashley

Good afternoon Commissioners,

Congratulations to President Sklar, and thank you, Commissioner Zavaleta, for your service.

Ashley Eagle-Gibbs, Executive Director of the Environmental Commission of West Marin, speaking on Item 9C.

In addition to being the petitioner for Duxbury Reef #32, we also **support strengthening our MPA network**, and we encourage the Commission to **deny all petitions that propose to weaken** the network. We highlight a joint letter submitted with other local and statewide NGOs in October 2025, encouraging a rejection of weakening petitions.

Related specifically to the Duxbury petition #32 to protect **contiguous and rare** habitat, we submitted written comments dated 2/6, which are in your packet. We also highlight recent support from a Sierra College professor. To summarize our comments,

1. We
2. **presented new information that the reef and northern extensions**
3. **are vulnerable places and contribute to larval dispersal.** These places may become
4. **refuges**
5. for southern and central CA communities as temperature gradients shift north with
6. **climate change.** We also presented **updated MPA Watch data.**
7. We reiterated our
8. **November amendment, which should address all commercial concerns.**
9. Related to recent outreach, we have met multiple times with representatives of Save Duxbury

10. Access and the Rod and Boat Club, and we are actively working to schedule an additional meeting this month. After a two-week delay, I just received an email response from them this morning. We continue to want to
- 11. work together constructively for a balanced solution that considers**
- 12. all perspectives while still providing greater regulatory protection for this sensitive habitat—a need that has been highlighted by educators, scientists, and environmental groups.**

We have also reviewed the alternate petition that Save Duxbury Access submitted late last week. We **agree** with many of the suggestions around improved signage and increased education, which we have actively been working on. For instance, we **met with Marin County Parks last week, related to updated signage, and we just trained another cohort of Duxbury Docents related to reef education.**

We are committed to an equitable data-driven process.

However, we submitted our petition because we also know that a **regulation change / adaptive management is also needed at the reef (which is one of the smallest MPAs) and is consistent with two out of three of the historic stakeholder groups, the Marine Life Protection Act, preferred span guidelines, and the changed** climatic conditions.

We request that the **Commission and/or their staff directly address the concern that a State Marine Reserve (SMR) would restrict non-consumptive, recreational uses** (e.g., visiting, walking, education, research, or tidepooling). A clarification from the state would help dispel local misinformation.

Lastly, we also highlight from your packet that the Marine Conservation Institute's preliminary analysis suggests that our petition **would improve the level of protection, expanding and strengthening the California MPA Network's conservation ability.** Thank you.

Ashley Eagle-Gibbs, Esq. (She/Her)

Executive Director

Environmental Action Committee of West Marin (EAC)

PO Box 609 | 65 Third Street, Suite 12

Point Reyes Station, CA | 94956

( [REDACTED]

[REDACTED]

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#### PRIVILEGE AND CONFIDENTIALITY NOTICE

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To the powers that be,  
My name is Mark Jacobson.  
I'm a 74 year old Man living in  
Bolinas Ca 94924.

I'm writing you to ask you to  
oppose Duxbury Reef MPA Petition  
2023-32 Submitted by EAC.  
What they are proposing is not  
Backed by science and won't  
solve the problem of overfishing  
The ocean near shore is already  
restricted.

I know you can't, But the Big factor  
fishing ships are the real problem  
Don't take our beach/ocean  
away

Mark Jacobson

CALIFORNIA FISH AND GAME COMMISSION  
RECEIVED 02/17/26

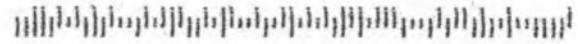
Mark Jacobsen SAN FRANCISCO CA 940

9 FEB 2026 PM 4 L



California Fish and game Comm.  
715 P Street, 16th floor  
Sacramento Ca 95814

95814-640815





February 23, 2026

Michael Yaun, Legal Counsel  
Melissa Miller-Henson, Executive Director  
California Fish and Game Commission

Re: Request to Deny and Remove EAC Duxbury Petition Under 14 CCR § 662(d)(1)

Dear Mr. Yaun and Ms. Miller-Henson,

We write on behalf of the Bolinas community most directly affected by the Environmental Action Committee's (EAC) petition to change regulations and boundaries at Duxbury Reef. This letter follows our prior correspondence regarding the treatment of the Save Duxbury Access FGC-1 filing as a petition for regulation change under Title 14, section 662, and our request for corrective action and Commissioner recusal. Our interest is in preserving the integrity and fairness of the Commission's process for all parties, including future proponents and opponents. We respectfully request that the staff advise the Commission that the EAC Duxbury Reef 2023-32MPA petition fails to meet the Commission's threshold standards for scientific sufficiency and public process under 14 CCR § 662 and related authorities, and that the Commission therefore should deny it under § 662(d)(1) and remove it from further consideration in this rulemaking cycle.

### **I. Scientific Insufficiency and Omission of Site-Specific Peer-Reviewed Data**

The Commission's petition framework, codified at 14 CCR § 662, requires that a petition, at a minimum, provide sufficient information to indicate that the requested regulatory change "may be warranted" before it is advanced. Under the MLMA and related guidance, Commission decisions are to be based on the best available scientific information and implemented through adaptive management. Here, the EAC petition seeks more restrictive regulation, including a dramatic boundary expansion, without presenting or engaging the best readily available, site-specific, peer-reviewed data for this site.

Approximately two decades of [UC Santa Cruz Long-Term Intertidal Monitoring data](#) exist from the middle of the Duxbury Reef SMCA, yet EAC's petition does not present this data at all, nor does it accurately summarize or meaningfully confront this body of work. When our group brought the UCSC/MARINE Duxbury dataset to light, EAC expressly disputed its relevance, even though it was collected at the center of the SMCA. EAC instead pointed to its own [MPA Watch volunteer survey data](#) on human use, anecdotal observations from its volunteers, and isolated observations from individual scientists who are not part of any peer-reviewed dataset.

This only underscores that the EAC petition both omits the principal site-specific, peer-reviewed evidence and elevates non-peer-reviewed, anecdotal information in its place, further confirming that it does not meet the Commission’s standard for “sufficient information” under § 662(d)(1).

A petition that proposes site-specific regulatory tightening while omitting the principal site-specific, peer-reviewed dataset is, by definition, not providing sufficient information that a change may be warranted within the meaning of § 662(d)(1). Advancing such a petition would be difficult to reconcile with the statutory requirement that decisions be grounded in the best available science, and would expose the Commission to claims of arbitrary and capricious action. Denying this petition on sufficiency and process grounds would not weaken the state’s MPA program; rather, it would reinforce that significant changes to protections and boundaries must meet the same science-based and equity-focused standards the Commission applies to all petitioners.

## **II. Defective and Misleading Public Process**

Independently, EAC’s petition suffers from serious procedural defects. The MLMA’s adaptive-management framework emphasizes that management decisions should be informed by stakeholder participation and be responsive to socioeconomic concerns. The original MLPA MPA design process likewise relied on extensive, region-wide public engagement and regional stakeholder groups.

In contrast, EAC has never hosted a single public meeting in Bolinas or in the broader West Marin community regarding this petition, despite Duxbury’s status as the only reasonably accessible rocky-reef shoreline in Bolinas, and one of the few in Marin County. Most Bolinas residents only learned of the petition in July 2025, when a community member happened upon a random Instagram post; by that time, the petition had been filed approximately 18 months prior and placed on a Commission track, and no structured local outreach by EAC had occurred. During this period, EAC represented to the Commission that the petition enjoyed “broad community support,” and that characterization was later upgraded in Commission-facing materials to “strong community support” before the lack of local notice and awareness came to light.

After learning that Bolinas residents had not been informed and did not, in fact, support the petition, Supervisor Rodoni, Congressman Huffman, and Marin County Parks all formally retracted their prior endorsements (see attached), explaining that they had understood the petition to reflect community support when it did not. Many affected residents and local civic bodies, including the Bolinas Public Utilities District, the Bolinas School, and the Bolinas Rod & Boat Club, have since placed on the record that they were not informed or included and do not support closure-oriented changes advanced in this manner.

As a practical matter, the absence of locally noticed public meetings by the petitioner, the late discovery by the Bolinas community of the petition through a chance social-media post, and the reliance on officeholder endorsements which were later retracted as having misunderstood local sentiment have together prevented Bolinas residents from meaningfully engaging in this

process as the very stakeholders the Commission's policies are intended to include. Given that Duxbury Reef is the only reasonably accessible rocky-reef fishery for Bolinas, and one of the few in Marin County, advancing a flawed petition without meaningful local engagement is especially at odds with the MLMA's direction to consider the long-term interests of small-scale fisheries and coastal communities and to minimize adverse impacts on them.

In light of this record, the petitioner's evolving claim of broad or strong community support is materially misleading. It has also had concrete consequences by creating the appearance of local agreement and compressing the opportunity for timely, informed participation in the Commission's process. Proceeding further with a petition that (a) was never the subject of any locally-noticed public meetings in the affected communities, and (b) rests on a now-refuted assertion of having "strong community support," would be inconsistent with the Commission's public-participation and environmental-justice commitments and would further increase the risk that any Commission action grounded on this petition could be characterized as arbitrary and capricious. For the same reasons, attempting to craft a partial or compromise outcome out of this petition would not cure these defects, because it would still rely on an evidentiary record that omits key site-specific science and on a process that excluded and misinformed the most affected community.

### **III. Requested Legal Guidance and Commission Action**

More broadly, state MPA managers have emphasized that the first decadal management review was not intended to produce major redesigns of the network, but limited adaptive adjustments. In that context, allowing a petitioner to use this review window to pursue sweeping reclassification and boundary changes at Duxbury Reef—particularly through a petition that omits key site-specific scientific data and lacks meaningful local engagement and support—risks undermining public trust in the MPA review framework and in the Commission's own expectations for the scope of petitions in this cycle.

For these reasons, we respectfully request that the Commission legal staff:

- Advise the Commission that, under 14 CCR § 662(d)(1), the EAC petition 2023-32MPA does not provide sufficient, site-specific scientific information to indicate that the requested regulatory change may be warranted, in light of the petition's omission and non-engagement with the principal site-specific, peer-reviewed Duxbury Reef SMCA UCSC dataset.
- Advise the Commission that the petition is procedurally defective under the Commission's expectations for stakeholder participation and consideration of socioeconomic impacts in adaptive management, in light of (i) petitioner's lack of any locally noticed public meeting in Bolinas or West Marin, (ii) the fact that most Bolinas residents only discovered the petition via a chance social-media post years after the filing date, and (iii) the subsequent retractions of support by Supervisor Rodoni, Congressman Huffman, and Marin County Parks based on their understanding that community support had been mischaracterized.

- Recommend that, rather than “grant[ing] EAC’s petition for further consideration” under § 662(d)(3), the Commission deny the petition under § 662(d)(1) and remove it from its rulemaking schedule for the current cycle, without prejudice to any future proposal that is grounded in the full body of site-specific, peer-reviewed science and developed through a transparent, locally-noticed public process in the affected communities. We also note that granting any portion of the EAC petition, or using it as a vehicle for partial changes, would still rest on the same scientifically incomplete and procedurally flawed record and would therefore carry the same sufficiency, equity, and litigation-risk concerns identified above.

Denial at this stage is also the fairest and most efficient way to resolve the issue, avoiding additional public and community resources being spent on a petition that does not meet the Commission’s own scientific and procedural thresholds. Denying this petition now would also be consistent with the MLMA Master Plan’s goals of clear expectations, transparency, and consistent application of MLMA-based management, which are essential to maintaining trust in the Commission’s processes.

We support adaptive, science-based management of the Duxbury Reef SMCA and do not seek to foreclose future, properly developed proposals; our purpose in urging denial here is to safeguard a fair, consistent process that all stakeholders can trust. Our request is that the Commission maintain the integrity of its petition-screening function by declining to advance a petition that is both scientifically incomplete and procedurally compromised.

Thank you for your attention to these concerns. We would welcome the opportunity to confer with staff at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Mollie Lounibos". The signature is fluid and cursive, with a large loop at the end.

Mollie Lounibos  
on behalf of Save Duxbury Access

JARED HUFFMAN  
2ND DISTRICT, CALIFORNIA

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House of Representatives  
Washington, DC 20515-0502

COMMITTEE ON  
NATURAL RESOURCES  
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ECONOMIC DEVELOPMENT, PUBLIC BUILDINGS,  
AND EMERGENCY MANAGEMENT

January 26, 2026

Erika Zavaleta, President  
Melissa Miller-Henson, Executive Director  
California Fish and Game Commission  
P.O. Box 944209  
Sacramento, CA 94244-2090

Dear President Zavaleta and Honorable Commissioners:

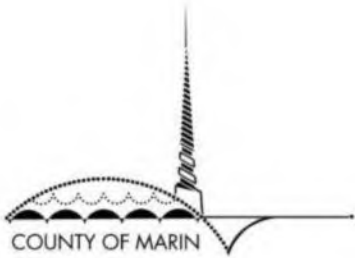
I am writing to modify my letter of support for EAC's petition to designate Duxbury Reef as a State Marine Reserve to a position of neutrality.

My letter of support was based on representation of broad local community support which is not present. I am encouraging everyone to keep working toward a consensus solution.

Sincerely,



**JARED HUFFMAN**  
Member of Congress



Marin County Civic Center  
3501 Civic Center Drive  
Suite 329  
San Rafael, CA 94903  
415 473 7331 T  
415 473 3645 F  
415 473 6172 TTY  
Dennis.Rodoni@marincounty.gov  
MarinCounty.gov/board

BOARD OF SUPERVISORS  
**DENNIS RODONI**  
Fourth District

January 15, 2026

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

**Re: Withdrawal of Support for Petition Regarding Duxbury Reef SMCA**

Dear President Zavaleta and Commissioners,

I am writing to formally withdraw my prior support for the Environmental Action Committee of West Marin's (EAC) petition requesting changes to the Marine Protected Area (MPA) designation at Duxbury Reef State Marine Conservation Area (SMCA), from my November 21, 2023 letter.

My prior support in 2023 was based on the petition's goal of improving clarity, consistency, and protection for a valued and sensitive marine environment. At the time my office was presented with 150 signatures of support, including from the local fishing community. The petition appeared to reflect broad and diverse community backing.

In the past year, I've heard from many other members of the West Marin community who are opposed to EAC's position and were unaware of the petition until well after its submission. They have shared their perspective that a more inclusive, community-informed approach is needed in shaping the future of Duxbury Reef – one that is rooted in long-standing connections to the reef.

Today, the Bolinas community is largely united in its opposition to the petition and their concern about being left out any public conversation prior to its submission. I hear my constituents clearly. They want an opportunity to be meaningfully engaged in shaping the future of Duxbury Reef, and deliberating this matter at the Fish and Game Commission level is simply too far along in the process.

I am respectfully asking for Commissioners to set aside, or withdraw, the petition. I request that Commissioners instead focus on creating an opportunity for meaningful community engagement and feedback – outside of a regulatory rulemaking context – to help develop a collective vision that reflects the local cultural, ecological, and recreational importance of Duxbury Reef.

The Bolinas community would be willing to come together for a constructive, respectful dialogue about the challenges facing the reef, especially those whose lives, work, and traditions are deeply linked to this coastline.

This is an opportunity for collaboration and for the community to work together toward shared stewardship of a place they deeply value.

I urge the Commission to set aside, or withdraw the petition, and allow the community to develop a broad community vision for stewardship of the Duxbury Reef.

Sincerely,

A handwritten signature in blue ink that reads "Dennis J. Rodoni". The signature is written in a cursive style with a prominent initial "D".

Dennis Rodoni



## MARIN COUNTY PARKS

Preservation • Recreation

Thursday, January 21, 2026

**MARIN COUNTY**  
PARKS  
PRESERVATION • RECREATION



**Chris Chamberlain**  
DIRECTOR AND  
GENERAL MANAGER

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parks.marincounty.gov

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

Re: Withdrawal of Support for Petition Regarding Duxbury Reef SMCA

Dear President Zavaleta and Commissioners,

Marin County Parks is writing to formally withdraw its prior support, expressed in correspondence dated November 2023, for the Environmental Action Committee of West Marin's (EAC) petition concerning proposed changes to the Marine Protected Area designation at Duxbury Reef State Marine Conservation Area.

At the time of our earlier correspondence, the petition was presented as having substantial community awareness and support. Since then, Marin County Parks has received feedback from West Marin residents indicating that many community members were unaware of the petition before its submission and do not support the proposed approach. This feedback highlights the need for broader engagement and dialogue before considering regulatory action.

As the steward of nearby coastal parks and open space preserves, and as a partner to surrounding communities and EAC, Marin County Parks believes that decisions affecting Duxbury Reef should be guided by an open, transparent public process that meaningfully includes the full range of community perspectives, particularly those with long-standing connections to the area.

Accordingly, Marin County Parks respectfully requests that the Commission withdraw the petition and encourage a community-based process to explore shared stewardship goals for Duxbury Reef.

We deeply believe in protecting this unique marine natural and cultural resource through thoughtful, long-term ecological stewardship.

Sincerely,

Chris Chamberlain, Director  
Marin County Parks

---

**Comment Package re Petition 2023-32MPA (Duxbury Reef SMCA, North Central Coast Design Record)**

---

**From** Save Duxbury Access <saveduxburyaccess@gmail.com>

**Date** Wed 02/25/2026 10:12 AM

**To** Yaun, Michael [REDACTED]; Miller-Henson, Melissa [REDACTED]

**Cc** FGC <FGC@fgc.ca.gov>; Ashcraft, Susan [REDACTED]; Shuman, Craig [REDACTED]; Eckerle, Jenn@CNRA <Jenn.Eckerle@resources.ca.gov>; Esgro, Michael@CNRA <Michael.Esgro@resources.ca.gov>; Kalua, Kaitlyn@CNRA <Kaitlyn.Kalua@resources.ca.gov>

Dear Executive Director Miller-Henson and Mr. Yaun,

Over the past week, we have submitted a small set of related letters on Duxbury Reef that are intended to work together as one comment package. First, our February 20 letter (“Treatment of Save Duxbury Access FGC-1 Filing as Petition for Regulation Change under Title 14, Section 662 and Request for Corrective Action and Commissioner Recusal”) explains why the Save Duxbury Access FGC-1 filing must be treated as a petition for regulation change under section 662, outlines how our site-specific Adaptive Management Plan satisfies the Commission’s regulation-change guidelines, and raises procedural fairness and recusal concerns around premature characterization of that petition. Second, our February 23 letter (“Request to Deny and Remove EAC Duxbury Petition Under 14 CCR § 662(d) (1)”) asks staff to advise the Commission that Petition 2023-32MPA does not meet the threshold standards for scientific sufficiency and public process under section 662, and to recommend denial and removal of that petition from this rulemaking cycle.

With this email, we are transmitting a third, complementary letter titled “Expansion or Redesignation of Duxbury Reef SMCA Is Not Justified Under MLPA/MLMA.” This letter, submitted on behalf of Save Duxbury Access and the Bolinas community most directly affected by the Duxbury Reef SMCA, focuses on the MLPA/MLMA planning and adaptive-management framework and the original North Central Coast design record. It explains why the current record does not support expanding or redesignating the Duxbury Reef SMCA and why a targeted, community-centered adaptive-management approach is more consistent with the governing Master Plans, decadal-review findings, and socioeconomic, equity, and commercial-fisheries guidance.

We respectfully request that you share all three letters with relevant Commission and Department staff working on the North Central Coast MPA decadal review and Petition 2023-32MPA, and that their analysis be considered as part of the record for any Duxbury-related recommendations and decisions.

Thank you very much for your time and for your continued work on a fair, science-based process.

Sincerely,  
Mollie Lounibos  
on behalf of Save Duxbury Access  
Bolinas, California

February 25, 2026

Michael Yaun, Legal Counsel  
Melissa Miller-Henson, Executive Director  
California Fish and Game Commission



Re: Expansion or Redesignation of Duxbury Reef SMCA Is Not Justified Under MLPA/MLMA

Dear Mr. Yaun and Ms. Miller-Henson,

We write to explain why any expansion or redesignation of Duxbury Reef State Marine Conservation Area (SMCA) would be inconsistent with the governing legal and planning framework for the North Central Coast MPAs and with the adaptive-management approach set out in the MLPA Master Plan and MLMA guidance.

**I. The original MLPA design record does not support a more restrictive Duxbury Reef SMCA**

The North Central Coast network was deliberately designed between 2007 and 2010 to meet the MLPA's goals through a balanced mix of SMR, SMCA, SMRMA, and special closures, with explicit attention to habitat representation and socioeconomic impacts. Duxbury Reef SMCA was adopted as a small, highly-protective MPA that nonetheless allowed limited shore-based finfish and abalone take, reflecting stakeholder compromise and the area's role as the only accessible rocky-reef shoreline for Bolinas, and one of the few in Marin County. The subsequent statewide Decadal Management Review found the network was, overall, performing well and did not recommend a sweeping redesign of the North Central Coast; instead, the Commission and Department emphasized adaptive, site-specific adjustments where warranted by evidence, rather than broad new closures.

The 2016 Master Plan's North Central Coast appendix describes this regional design as already meeting MLPA requirements and emphasizes that the adopted network represents a negotiated balance among ecological and human-use considerations. Nothing in that record identifies Duxbury Reef as under-protected or flagged for future expansion or conversion to SMR status; it is one of only a limited number of SMCAs in a region that already includes numerous SMRs and special closures.

Departing from that carefully documented design—by substantially expanding Duxbury's boundaries or converting it to a highly restrictive no-take SMR—therefore requires a clear

showing that conditions at this site have changed in a way that undermines the original goals, not simply that some stakeholders now prefer a different outcome.

## **II. Adaptive management requires site-specific, best-available science**

The Master Plan defines adaptive management as adjusting the MPA network based on monitoring and other best-available information, evaluated through formal ten-year reviews. It stresses that changes should be guided by evidence about whether existing MPAs are meeting objectives, not by generalized concern or advocacy alone.

At the Duxbury Reef SMCA, the best-available, site-specific ecological record is the [long-term UC Santa Cruz/MARINE intertidal monitoring at Bolinas Point](#), located in the middle of the SMCA. The comprehensive UC Santa Cruz Long-Term Intertidal Monitoring Site Data for Duxbury/Bolinas Point, which the petitioner omitted, shows that rocky intertidal communities at Duxbury Reef are doing well and not in decline over the roughly two decades of monitoring. This data demonstrates stable rocky intertidal communities over decades under the current SMCA configuration, with no evidence of ecological collapse attributable to existing, tightly constrained consumptive use. CDFW enforcement records likewise do not show a documented pattern of poaching or chronic SMCA violations at Duxbury, let alone a pattern that would justify moving from the current education-and-enforcement-based approach to a more restrictive and expansive spatial closure. Regional North Central Coast monitoring and "State of the Region" reporting likewise do not identify Duxbury Reef as an ecological failure point within the MPA network.

The petition presents no verified scientific evidence that tightly regulated hook-and-line fishing from shore is harming the reef, and instead attributes alleged impacts primarily to educational tidepool use at Agate Beach. By contrast, the petition advocating expansion relies almost entirely on non-peer-reviewed, human-use survey data and anecdotal observations, rather than peer-reviewed, site-specific ecological analyses showing that current regulations are inadequate. The petition's claims of "high levels of poaching" rest largely on [MPA Watch reports](#) of temporary handling of organisms by school groups and visitors for observation, which even EAC's own narrative acknowledges typically cease once docents explain the rules. Recasting such short-term handling as "poaching" inflates perceived noncompliance and does not constitute evidence of sustained illegal take.

Under the Master Plan's emphasis on best-available information, it would be arbitrary to elevate coarse regional use counts and volunteer observations over two decades of standardized and detailed scientific monitoring at the very site in question. In an adaptive-management framework, a major boundary expansion or redesignation is warranted only when monitoring shows that an MPA is failing to meet ecological objectives despite existing tools and when there is a clear, evidence-based link between the identified problem and the proposed remedy. *That showing has not been made for Duxbury Reef.*

## **III. MLMA and Master Plan require serious attention to socioeconomic and equity impacts**

The MLMA Master Plan and the MLPA Master Plan both require that management decisions consider the long-term interests of people dependent on marine resources, including small-scale and subsistence fishers, and that equitable treatment of coastal communities be part of decision-making. The North Central Coast design process explicitly weighed socioeconomic impacts and sought to minimize undue burdens on fishing-dependent communities while still meeting conservation goals.

Duxbury Reef is the only reasonably accessible rocky-reef fishery for Bolinas and one of very few in Marin County. As the Save Duxbury Access petition and Adaptive Management Plan Framework detail, expanding the SMCA or converting it to an SMR would disproportionately harm subsistence and low-income shore-based households that rely on legal, small-scale harvest from the open areas north and south of the current boundary for affordable, culturally meaningful food, while more affluent or boat-based users can relocate effort elsewhere. Those households include shellfish and kelp gatherers who depend on legal, walk-in access to nearby reefs for affordable, culturally important protein and traditional foods, not just hook-and-line anglers. In a county where an estimated 37,000 residents live in poverty and roughly one in five are food insecure, and where nearly 40% of Bolinas-Stinson students qualify for free or reduced-price school meals, eliminating the only accessible rocky-reef fishery would have food-security impacts on low-income households.

These impacts are compounded for our small-scale commercial fleet and mixed commercial-recreational operators, who have already absorbed significant cumulative losses of traditional fishing grounds and seasons in this region and whose historic, low-impact fishery out of Bolinas is a core part of the community's working-waterfront identity. Further constraining the remaining nearby grounds at Duxbury would not only reduce already-limited opportunities for sustainable local harvest, but would also weaken the local foods economic base—grocery stores, restaurants, and small tourism businesses that depend on being able to offer fresh, locally caught seafood from Bolinas.

This would come on top of a landscape in Marin County where most freshwater streams are closed to fishing, many MPAs already prohibit all take, several nearby water bodies are fully closed to fishing, and key regional fisheries such as ocean salmon are shut, leaving few affordable, legal options for local and regional families. The Commission's coastal fishing communities and equity policies both caution against changes that shift burdens onto marginalized, small coastal communities without compelling justification.

The socioeconomic objectives in these guiding documents stress minimizing adverse impacts on small-scale fisheries and coastal communities and maintaining their resilience. Imposing a more restrictive designation at Duxbury in the absence of demonstrated ecological failure would conflict with those objectives and would likely be viewed as an unnecessary and inequitable burden on one of the region's most access-constrained communities.

#### **IV. Process defects weigh against using this petition to drive major changes**

The MLPA planning record and the Master Plan both emphasize inclusive, transparent stakeholder processes as a core component of network design and adaptive management. In the North Central Coast Initiative, this took the form of regional stakeholder groups, extensive workshops, and deliberate balancing of perspectives.

By contrast, the current petition to expand or reclassify the Duxbury Reef SMCA was developed and filed without any locally noticed public meeting in Bolinas or West Marin, despite the site's central importance to that community. Bolinas residents largely learned of the petition by chance on social media roughly 18 months after filing, long after it had been docketed and represented to the Commission as enjoying "broad" or "strong" community support—characterizations that key endorsers later retracted once they understood local opposition. Local fishers and other traditional users—arguably the most impacted stakeholders—were not meaningfully engaged by the petitioner, raising direct concerns under the Commission's Coastal Fishing Communities and JEDI policies.

Proceeding to major boundary or designation changes on the basis of a petition with such process defects would be at odds with the Commission's own public-participation commitments and with the participatory spirit of the MLPA redesign process in this region. It would also heighten litigation risk by inviting arguments that the agency relied on a record that systematically under-represents the most affected community while over-weighting advocacy narratives from better-resourced organizations.

#### **V. The appropriate adaptive-management response at Duxbury Reef SMCA is targeted stewardship, not expansion**

The Master Plan encourages alignment with other management tools and recognizes that education, enforcement, and local partnerships can often address human-use issues without changing spatial designations. The Save Duxbury Access FGC-1 alternative petition and accompanying Adaptive Management Plan Framework offer precisely this kind of alternative: retaining the existing SMCA boundaries and designation while implementing a robust, community-centered stewardship program, improved signage, youth Coastal Ambassadors, and enhanced coordination with CDFW and Marin County Parks.

[EAC's own MPA Watch data](#) show that visitation at Duxbury Reef SMCA is relatively low compared to other accessible tidepools and has leveled off since the pandemic surge, undercutting the notion of a growing pressure crisis that would justify more restrictive spatial measures. Retaining the existing SMCA while implementing the Save Duxbury Access adaptive-management and stewardship measures is fully consistent with the MLPA and MLMA emphasis on adaptive, science-based management using a suite of tools and on collaborative partnerships with local communities. It directly targets the documented problem of visitor confusion and localized trampling in a small portion of the SMCA, rather than imposing a sweeping expansion whose primary effect would be to end lawful, small-scale access for a coastal community that has not been shown to be degrading the resource. To the extent there are specific concerns about school field trips or other organized educational visits, the most direct adaptive-management response is to work with those educators and program leaders

through targeted outreach and co-developed stewardship practices, as outlined in our alternative petition, rather than to expand boundaries or redesignate the SMCA.

## **VI. 30×30 goals do not justify an expansion at Duxbury Reef SMCA**

We recognize and support California's commitment to conserving 30% of its coastal waters by 2030. EAC has recently described an informal “intertidal-only” narrowing of its proposal, but the filed petition still seeks to convert Duxbury Reef to a no-take SMR with expanded intertidal boundaries, so any claim that commercial and community impacts have been eliminated rests on verbal characterizations rather than on the actual operative petition language. California’s MPA network has recently been accepted to the IUCN Green List of Protected and Conserved Areas and described by state leaders as an international “gold standard” network, based in part on evidence from the first Decadal Management Review that the system is delivering significant ecological benefits across the state. The existing MLPA MPA network—including Duxbury Reef SMCA—already counts toward the State's 30×30 totals as a durably protected, science-based conservation measure.

California’s 30×30 guidance emphasizes science-based, community-driven implementation, not using individual small SMCAs as quota targets for new no-take designations or areas to expand in the absence of site-specific need, and repeatedly highlights equitable outdoor access and the importance of ensuring that marginalized communities benefit from conservation designations. A “more protection is always better” approach at Duxbury Reef that ignores subsistence and shore-based users and assumes that recent verbal amendments have somehow eliminated commercial impacts would conflict with those principles by shifting the burdens of 30×30 implementation onto the people and small businesses with the fewest alternatives, including the remaining small-boat commercial operators who rely on nearby, weather-dependent access.

At Duxbury, the best available ecological information shows stable rocky intertidal communities under current rules, and the most directly affected coastal community has put forward a detailed adaptive-management regulation change alternative rather than calling for less protection. Treating Duxbury Reef as a convenient place to ‘add more percentage’ for 30×30, despite this record, would conflict with the MLPA/MLMA requirements for site-specific, science-based, equitable, and community-responsive management that govern any change to this site.

## **VII. Request**

In light of the above, we respectfully request that staff:

- Recognize, in any forthcoming analysis and recommendations, that the MLPA Master Plan, the North Central Coast design record, and MLMA/MLPA guidance do not support a boundary expansion or redesignation at Duxbury Reef SMCA in the absence of site-specific, rigorous scientific evidence of ecological failure and a full accounting of disproportionate socioeconomic and equity impacts.
- Treat the existing UCSC/MARINe intertidal monitoring over two decades at Bolinas Point and related site-specific datasets as the best-available ecological information for

Duxbury Reef SMCA and explicitly explain how those data are weighed against non-peer-reviewed, anecdotal human-use surveys.

- Decline to recommend expansion or redesignation at Duxbury Reef SMCA based on the current petition record and instead explore adaptive-management alternatives that strengthen education, signage, local stewardship, and enforcement within the existing SMCA framework.

We support a strong, science-based MPA network and are committed to collaborative stewardship at Duxbury Reef. Our request is that the Commission and Department honor the MLPA and MLMA's full set of requirements—scientific, socioeconomic, and procedural—by rejecting unjustified expansion or redesignation here and pursuing a targeted, community-driven adaptive-management path instead.

Sincerely,

A handwritten signature in black ink, appearing to read "Mollie Lounibos". The signature is fluid and cursive, with a large loop at the end.

Mollie Lounibos  
on behalf of Save Duxbury Access  
Bollinas, California



## MARIN COUNTY PARKS

Preservation • Recreation

Thursday, January 21, 2026

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

Re: Withdrawal of Support for Petition Regarding Duxbury Reef SMCA

Dear President Zavaleta and Commissioners,

Marin County Parks is writing to formally withdraw its prior support, expressed in correspondence dated November 2023, for the Environmental Action Committee of West Marin's (EAC) petition concerning proposed changes to the Marine Protected Area designation at Duxbury Reef State Marine Conservation Area.

At the time of our earlier correspondence, the petition was presented as having substantial community awareness and support. Since then, Marin County Parks has received feedback from West Marin residents indicating that many community members were unaware of the petition before its submission and do not support the proposed approach. This feedback highlights the need for broader engagement and dialogue before considering regulatory action.

As the steward of nearby coastal parks and open space preserves, and as a partner to surrounding communities and EAC, Marin County Parks believes that decisions affecting Duxbury Reef should be guided by an open, transparent public process that meaningfully includes the full range of community perspectives, particularly those with long-standing connections to the area.

Accordingly, Marin County Parks respectfully requests that the Commission withdraw the petition and encourage a community-based process to explore shared stewardship goals for Duxbury Reef.

We deeply believe in protecting this unique marine natural and cultural resource through thoughtful, long-term ecological stewardship.

Sincerely,

Chris Chamberlain, Director  
Marin County Parks

MARIN COUNTY  
PARKS  
PRESERVATION RECREATION



Chris Chamberlain  
DIRECTOR AND  
GENERAL MANAGER

1600 Los Gatos Drive  
Suite 275  
San Rafael, CA 94903  
415 473 6387 T  
[parks.marincounty.gov](http://parks.marincounty.gov)



## **GOLDEN GATE FISHERMANS ASSOCIATION**

**Re: Opposition to the Proposed Expansion of the Duxbury Reef Marine Protected Area**

**To Whom It May Concern,**

**On behalf of the Golden Gate Fishermen's Association (GGFA), we respectfully submit this letter in opposition to the proposed expansion of the Marine Protected Area (MPA) at Duxbury Reef.**

**GGFA represents the Commercial Passenger Fishing Vessel (CPFV) fleet from Monterey to the California–Oregon border. Our member vessels provide access to California's public fisheries for thousands of residents and visitors each year, many of whom would otherwise have no opportunity to fish due to economic, physical, or geographic limitations. Any expansion of the Duxbury Reef MPA would further restrict access to these public trust resources and disproportionately impact underprivileged and local community members who rely on affordable and equitable access to the ocean.**

**As an association, GGFA strongly believes that California's fisheries are a shared public resource. Our mission is to ensure equitable access to these fisheries for all communities, regardless of income level or background. Restricting access through additional MPA expansion directly conflicts with this principle and undermines the role CPFV operators play in connecting diverse communities to California's marine environment.**

**Our vessels have a long history of fishing responsibly and sustainably while contributing to local economies, coastal communities, and ocean stewardship. Further closures in areas like Duxbury Reef remove historically important fishing grounds without sufficient consideration of social, economic, and access-related impacts.**

**We are concerned that continued MPA expansion without demonstrable conservation necessity shifts the burden of protection onto working families, small businesses, and underserved communities, while failing to acknowledge the conservation success already achieved through existing regulations. Limiting access does not equate to equity, nor does it automatically result in improved resource outcomes.**

**GGFA urges decision-makers to reject the proposed expansion of the Duxbury Reef MPA and instead pursue management strategies that balance conservation goals with continued public access, and community inclusion.**

**Thank you for the opportunity to provide comment and for considering the voices of the fishermen, operators, and communities we represent.**

**Respectfully submitted,**

**Golden Gate Fishermen's Association**

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## Support for Save Duxbury Access and Community Stewardship at Duxbury Reef

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**From** Pam Fabry [REDACTED]  
**Date** Mon 03/30/2026 01:38 PM  
**To** FGC <FGC@fgc.ca.gov>  
**Cc** saveduxburyaccess@gmail.com <saveduxburyaccess@gmail.com>

[fgc@fgc.ca.gov](mailto:fgc@fgc.ca.gov), [saveduxburyaccess@gmail.com](mailto:saveduxburyaccess@gmail.com)

Dear Fish and Game Commissioners

I am a Bolinas resident writing to oppose the EAC's Petition 2023-32MPA and to support Save Duxbury Access's alternative petition and Adaptive Management Plan for Duxbury Reef SMCA.

I support this alternative approach because it reflects local stewardship, respects existing access, and uses science, education, voluntary compliance, and community engagement to protect the reef.

Duxbury Reef should be managed in a way that protects habitat without unnecessarily closing off access or ignoring the community that cares for it.

I also support preserving fishing access and the ability to gather shellfish and kelp in the currently open northern and southern areas, which remain important to local subsistence and community use.

I respectfully request that the Commission:

1. Maintain the current Duxbury Reef SMCA designation as supported by CDFW.
2. Maintain the current Duxbury Reef SMCA boundaries unless and until the record contains a functioning local adaptive management framework, direct evidence of a site-specific need linked to an identified threat, and a comprehensive cumulative impacts analysis for the affected area.
3. Ensure that the February 2026 Save Duxbury Access alternative petition and adaptive management framework are formally included in the record.

Thank you for considering my comment.

Sincerely,

Pam Fabry  
Bolinas, CA

## Duxbury Reef

---

**From** meg simonds [REDACTED]  
**Date** Tue 03/31/2026 09:45 AM  
**To** FGC <FGC@fgc.ca.gov>

Please maintain the current Duxbury Reef SMCA designation and boundaries and include the February 2026 Save Duxbury Access alternative petition in the record.

The California Department of Fish and Wildlife, apparently, agrees and rejected the EAC push to turn Duxbury Reef into a no-take zone.

Do the right thing here, save Duxbury access.

Thank you,  
Meg Simonds  
Bolinás resident since 1977

**Pat Dickens**

---

**From** Pat Wrobel-Dickens [REDACTED]

**Date** Tue 03/31/2026 09:08 AM

**To** FGC <FGC@fgc.ca.gov>; patdickens [REDACTED]

First of all, thank you for your service! I have lived in Bolinas for 30 years. I strongly ask you to maintain the current Duxbury Reef SMCA designation and boundaries and that they include the 2/26 Save Duxbury Access alternative petition in the record. Thank you!

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**Re: Request to Deny and Remove EAC Duxbury Petition 2023-32MPA Under 14 CCR § 662(d)(1)**

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From Save Duxbury Access <saveduxburyaccess@gmail.com>

Date Thu 04/02/2026 02:47 PM

To Yaun, Michael [REDACTED]; Miller-Henson, Melissa [REDACTED]  
[REDACTED]

Cc FGC <FGC@fgc.ca.gov>; Ashcraft, Susan [REDACTED]; Shuman, Craig [REDACTED]  
[REDACTED]

Dear Mr. Yaun and Ms. Miller-Henson,

Following up on our February 23, 2026 request regarding Petition 2023-32MPA (copied below), and in light of CDFW's March 2026 evaluation of the petition, Save Duxbury Access is submitting the attached follow-up letter for inclusion in the administrative record.

The letter documents additional petition-sufficiency and consistency concerns that have become clearer now that CDFW's evaluation is available, particularly with respect to section 662(d)(1), reliance on information outside the petition, and the treatment of boundary expansion in this cycle.

We respectfully ask that this follow-up be provided to the Commission along with our prior February 23 letter and be reflected in any staff guidance regarding the status and use of Petition 2023-32MPA.

Thank you for your continued attention to these issues.

Best regards,  
Mollie Lounibos  
Save Duxbury Access

*Save Duxbury Access is a grassroots group of Bolinas residents who believe in protecting Duxbury Reef while keeping access open for low-impact fishing (both commercial and recreational), legal subsistence gathering, surfer access, tidepooling, and reef educational programs for schools. Protecting access ensures that our children will nurture a connection with nature and continue our longstanding tradition of responsible stewardship in Bolinas, California.*

On Mon, Feb 23, 2026 at 8:03 AM Save Duxbury Access <saveduxburyaccess@gmail.com> wrote:

Dear Mr. Yaun and Ms. Miller-Henson,

Attached please find a letter from Bolinas residents regarding the EAC petition 2023-32MPA for Duxbury Reef. We are requesting that legal staff advise the Commission to deny the petition under 14 CCR § 662(d)(1) and remove it from further consideration because it lacks sufficient site-specific, peer-reviewed scientific support and was advanced without meaningful local notice or engagement, resulting in mischaracterized "strong community support" and later retracted endorsements. Our goal is to help preserve a fair, consistent, and efficient process that upholds the MLMA's science, socioeconomic, and transparency objectives for all stakeholders.

Thank you for your consideration,

Mollie Lounibos  
on behalf of Save Duxbury Access



April 2, 2026

Michael Yaun, Legal Counsel  
Melissa Miller-Henson, Executive Director  
California Fish and Game Commission

Re: Follow-Up to February 23, 2026 Request to Deny and Remove Petition 2023-32MPA Under 14 CCR § 662(d)(1)

Dear Mr. Yaun and Ms. Miller-Henson,

This letter respectfully follows the February 23, 2026 request that Commission staff advise the Commission to deny and remove Petition 2023-32MPA under 14 CCR § 662(d)(1) because the petition did not, on its face, provide sufficient information to indicate that the requested regulatory changes may be warranted. The California Department of Fish and Wildlife's March 2026 evaluation confirms that substantial additional information outside the four corners of the petition was required for CDFW to complete its review, and that point should now be clearly acknowledged in the administrative record.

This follow-up is not offered to dispute CDFW's authority to consider other readily available information once a petition has been accepted for evaluation. Rather, it is submitted to document that the need for such supplementation underscores the core concern raised in the February 23 letter: the Environmental Action Committee's petition did not itself present the site-specific scientific, enforcement, fisheries, socioeconomic, and community-use information necessary to demonstrate that the requested changes may be warranted under section 662.

### **Scientific insufficiency**

The February 23 letter explained that the petition sought site-specific regulatory tightening while omitting the principal site-specific, peer-reviewed ecological dataset for Duxbury Reef, namely the long-term UCSC/MARINE record from the middle of the SMCA. CDFW's evaluation confirms that it had to review MARINE long-term monitoring data, MLPA planning materials, enforcement and compliance data, and other external information in order to evaluate the petition.

That supplementation was not minor. In evaluating the SMR proposal, CDFW relied on MARINE monitoring to conclude that some species have increased over time while others have declined, that those patterns are consistent with broader statewide variability, and that observed ecological variability cannot be attributed to a single factor such as human visitation or potential poaching. Those are central analytical points, but they were not supplied in the petition itself and instead had to be drawn from the broader record and CDFW's own review.

## **Enforcement and interpretation of MPA Watch**

The same is true of enforcement. The petition relied heavily on MPA Watch characterizations of over 1,600 “potential violations,” but CDFW determined that MPA Watch is not designed to collect definitive violation data, noted that only a small subset of observations were reported to enforcement, and relied on Marine Enforcement District data showing zero citations at Duxbury Reef between 2019 and 2025. CDFW further concluded that MED data did not substantiate the petition’s claim of a serious enforcement problem within the existing MPA boundaries and that improved signage, education, and outreach could be as effective as or more effective than redesignation.

These conclusions depended on enforcement records and program design information that were not presented in the petition and had to be supplied by CDFW. Again, the question for section 662 is not whether CDFW may look at its own records once a petition is in hand, but whether a petition that requires that level of reinterpretation and supplementation can be said to have provided “sufficient information” on its face that the requested change may be warranted.

## **Fisheries, community use, and cumulative socioeconomic impacts**

CDFW also had to supplement the petition with fisheries and access information that the petition itself did not meaningfully provide. The evaluation brought in commercial California halibut landings and block data, finding that the proposed expansion area overlaps with fishing block 447, the most valuable block for the hook-and-line California halibut fishery operating out of the port of Bolinas, and that commercial fishermen report fishing within 1,000 feet from shore outside the existing SMCA when conditions allow, especially in the northern portion of the reef. None of that detail appears in the petition; it was supplied by CDFW and by community input outside the petition process.

The evaluation likewise relied on a broader understanding of the original design and community-use context of Duxbury Reef than was reflected in the petition. CDFW emphasized that Duxbury Reef SMCA was deliberately designed during the MLPA process to protect the intertidal reef while preserving shore-based recreational fishing, that maintaining current take allowances supports local marine resource access and long-standing fishing practices, and that the proposed changes would affect recreational anglers, subsistence users, and the small-boat fishing community homeported in Bolinas. These issues were central to the merits analysis, yet they were not adequately developed in the petition that sought the regulatory change.

At the same time, the petition did not provide a cumulative socioeconomic analysis of how boundary expansion and redesignation would interact with existing layers of protection and with long-standing constraints on small-scale commercial, charter, and subsistence opportunities in West Marin. That broader cumulative-impact picture has been developed through subsequent community submissions and the Save Duxbury Access counter-petition, but it was not part of the evidentiary showing in the EAC filing and has not yet been fully integrated into CDFW’s treatment of the EAC petition as such.

## **Missing adaptive management and governance framework**

Another important gap is adaptive management. CDFW’s evaluation states that the proposed changes do not advance adaptive-management recommendations from the Decadal Management Review and that there is no functioning local adaptive management framework at Duxbury today.

The petition did not present any Duxbury-specific adaptive-management and governance plan to guide implementation, monitoring, and future adjustments to tighter regulations.

By contrast, the Save Duxbury Access alternative petition and associated materials provide a detailed, site-specific adaptive management framework and a proposed multi-stakeholder governance structure for Duxbury Reef. Those elements are now in the Commission's record, but they are not part of the EAC petition itself and were not used by CDFW as a basis for finding that the petitioned regulatory changes may be warranted. This reinforces that the EAC petition did not contain the kind of adaptive-management showing that CDFW has demanded in other Bin 2 matters.

### **Boundary expansion record and feasibility**

The same problem exists with the northern and southern boundary expansion requests. The evaluation acknowledges that CDFW had to rely on other information beyond the petition, including MARINE data, enforcement data, MLPA planning documents, and commercial California halibut landings, in order to reach that recommendation, but none of these findings support the need for a boundary adjustment. Instead, the justification for these changes relies solely on generalized precautionary and speculative concerns. The evaluation also states that the proposed boundaries, as submitted, do not align with CDFW feasibility guidelines and would need to be redesigned by CDFW to optimize enforceability and avoid unnecessarily restricting existing uses.

That point is significant for the section 662 threshold question. A petition that requires CDFW to supply key site-specific ecological context, reinterpret the petitioner's enforcement evidence, introduce omitted fisheries-impact information, and redesign the proposed boundaries to consider feasibility is not a petition that, on its own face, provides sufficient information to indicate that the requested changes may be warranted within the meaning of section 662(d)(1), and should therefore not be relied upon as the basis for advancing boundary expansion in this cycle.

### **Public process, equity, and consistency**

The February 23 letter also documented the petition's public-process deficiencies, including the absence of locally noticed public meetings in Bolinas or West Marin, the late discovery of the petition by affected residents, and the subsequent retractions of prior support by Representative Jared Huffman, Supervisor Dennis Rodoni, and Marin County Parks after they learned local support had been mischaracterized. Nothing in CDFW's evaluation cures those defects, and the evaluation's recommendation that petitioners work with the local community of Bolinas and other interested parties to build a comprehensive outreach and education strategy only underscores that meaningful local engagement remained incomplete.

In addition, Save Duxbury Access's April 2 response identified a broader consistency concern across the Bin 2 petitions: in other matters, CDFW denied changes where the record lacked site-specific evidence, conflicted with original MPA intent, failed to improve network design, created feasibility or enforceability concerns, or imposed unnecessary socioeconomic impacts. In those cases, CDFW did not recommend granting petitions that needed this level of supplementation and redesign. If petitions lacking that level of support were denied elsewhere, the Commission should at minimum acknowledge that Petition 2023-32MPA required unusual supplementation and explanation to proceed as far as it did.

## Requested action

For these reasons, this follow-up respectfully requests that Commission legal staff and the administrative record reflect the following points:

- Petition 2023-32MPA did not itself provide the full body of site-specific scientific, enforcement, fisheries, adaptive-management, socioeconomic, and community-use information on which CDFW ultimately relied in its evaluation.
- CDFW's ability to complete an evaluation by consulting MARINE monitoring, MED enforcement data, MLPA planning materials, commercial halibut block data, and other external information does not eliminate the separate threshold concern that the petition, on its face, was insufficient under 14 CCR § 662(d)(1).
- The petition's scientific and public-process deficiencies remain relevant to whether the Commission should give any further weight to the petition as a vehicle for regulatory change in this cycle, especially where comparable petitions were denied for lack of site-specific evidence, feasibility, network benefit, or justified socioeconomic impacts.
- Any future proposal to expand boundaries or otherwise tighten regulations at Duxbury Reef should be required to present, within the proposal itself, site-specific scientific evidence, fisheries and cumulative socioeconomic analysis, a feasible boundary design, a Duxbury-specific adaptive-management and governance framework, and a transparent, locally noticed community process before it is advanced for further consideration.

The intent of this follow-up is to preserve clarity in the record and to support consistent application of the Commission's threshold and adaptive-management standards. CDFW's evaluation makes clear that the administrative record only became sufficient after substantial supplementation from outside the petition itself. That fact should be formally recognized so that the same minimum expectations are applied evenly to all petitioners in this and future cycles.

Respectfully submitted,



Mollie Lounibos  
on behalf of Save Duxbury Access

*Save Duxbury Access is a grassroots group of Bolinas residents who believe in protecting Duxbury Reef while keeping access open for low-impact fishing (both commercial and recreational), legal subsistence gathering, surfer access, tidepooling, and reef educational programs for schools. Protecting access ensures that our children will nurture a connection with nature and continue our longstanding tradition of responsible stewardship in Bolinas, California.*

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## Support for Save Duxbury Access and Community Stewardship at Duxbury Reef

---

**From** Weston Borg [REDACTED]  
**Date** Thu 04/02/2026 07:54 AM  
**To** FGC <FGC@fgc.ca.gov>  
**Cc** saveduxburyaccess@gmail.com <saveduxburyaccess@gmail.com>

Fish and Game Commissioners,

I am a Bolinas resident writing to oppose the EAC's Petition 2023-32MPA and to support Save Duxbury Access's alternative petition and Adaptive Management Plan for Duxbury Reef SMCA.

I support this alternative approach because it reflects local stewardship, respects existing access, and uses science, education, voluntary compliance, and community engagement to protect the reef.

Duxbury Reef should be managed in a way that protects habitat without unnecessarily closing off access or ignoring the community that cares for it.

I also support preserving fishing access and the ability to gather shellfish and kelp in the currently open northern and southern areas, which remain important to local subsistence and community use.

I respectfully request that the Commission:

1. Maintain the current Duxbury Reef SMCA designation as supported by CDFW.
2. Maintain the current Duxbury Reef SMCA boundaries unless and until the record contains a functioning local adaptive management framework, direct evidence of a site-specific need linked to an identified threat, and a comprehensive cumulative impacts analysis for the affected area.
3. Ensure that the February 2026 Save Duxbury Access alternative petition and adaptive management framework are formally included in the record.

I appreciate the consideration of my comment.

Sincerely,

Weston Borg  
Bolinas, CA



March 25, 2026

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

**SUBJECT: Opposition to Marine Protected Area Regulation Change Petition 2023-33MPA**

Commissioners:

The Santa Cruz Port District recognizes that properly designed and managed Marine Protected Areas (MPAs) play a critical role in protecting the natural diversity and abundance of marine life along the California Coast. Significant resources are required to manage California's extensive network of MPAs, and we appreciate the opportunity to comment on the proposed regulation change petitions which are currently being considered.

As you know, California's network of MPAs was developed by utilizing a science-based and highly collaborative stakeholder-driven planning process. This was done to ensure that California's MPAs had clearly defined objectives, were based on sound scientific guidelines, and accurately balanced both ecological and socioeconomic priorities by region.

Petition 2023-33MPA seeks, in part, to designate one new SMR off Pleasure Point and expand the boundary of one existing SMR off Natural Bridges for purposes of kelp forest preservation. The Santa Cruz Port District is writing to express its strong opposition to Petition 2023-33MPA and request that it be denied.

As proposed, Petition 2023-33MPA is extremely broad and would result in the wholesale elimination of commercial and recreational fishing opportunities in areas directly adjacent to Santa Cruz Harbor. The petition fails to provide regionally specific scientific substantiation to support its position, neglects to comprehensively evaluate the socioeconomic impacts associated with implementing and revising MPAs in locations directly adjacent to active fishing ports, and fails to work collaboratively with key regional stakeholders. If approved, Petition 2023-33MPA will significantly impact commercial and recreational fishing activities in the Monterey Bay, resulting in detrimental ramifications to the health and vitality of our coastal community.

The Santa Cruz Port District has been a longstanding collaborative partner with CDFW, performing extensive outreach and MPA education to the boating and fishing communities. We recognize that safeguarding the integrity of our region's ecosystem is critical, but oppose enacting regulation change petitions that seek wholesale elimination of fishing access, lack regionally specific scientific substantiation, and fail to garner input from key regional stakeholders. Accordingly, we request that action be taken to deny Petition 2023-33MPA.

Sincerely,

A handwritten signature in black ink that reads 'Reed Geisreiter'. The signature is written in a cursive, flowing style.

Reed Geisreiter  
Santa Cruz Port Commission Chair

**To:** Melissa Miller-Henson, Executive Director of the California Fish and Game Commission

March 31, 2026

**Subject:** Lack of scientific basis for expanding the south Point Loma SMR

The joint petition put forward by Environment California and Azul (2023-33MPA\_1\_AM1) to expand Cabrillo State Marine Reserve (SMR) westward (to 3-mile state line) and northward to New Hope Rock by ~9.99 sq miles would expand the existing small SMR at the tip of Point Loma to encompass more than 40% of the Point Loma kelp forest. The joint petition asserts that the decline of kelp in California is driven by extractive fishing of sea urchin predators (they cite overfishing of California Sheephead and lobsters) which has led to increases in sea urchins, overgrazing, formation of urchin barrens and declines in kelp. The petition asserts that this fishing effect applies to kelp beds throughout California. The proposed expansion of the SMR would prohibit fishing over more than 40% of the Point Loma kelp forest and would result in effectively eliminating the dive fishery for sea urchins, an important economic resource for the San Diego region. Environmental California and Azul's generalization about fishing leading to trophic cascades and resulting kelp decline is not supported by any data we are aware of. In the Point Loma kelp forest in particular it is contradicted by the extensive data of Parnell et al. 2026, based on 42 years of detailed studies of the demographics of giant kelp throughout the Point Loma kelp forest. During these studies there has been fishing for both lobsters, Sheephead and sea urchins and there has been no concomitant increase in adverse effects of sea urchins on giant kelp. In their extensive long-term studies, Parnell and colleagues have also found that there is no significant relationship between the sizes of giant kelp cohorts and the density of sea urchins, evidence contradicting the assertions of Environment California and Azul.

Based on observations made during more than 15,000 dives in the Point Loma and La Jolla kelp beds since 1976 the Red Sea urchin population has been reduced by sea urchin harvests to an estimated 30% of the size in 1976. Understory algae and elkhorn kelp have replaced giant kelp in many areas. Pushing harvests further away from the Port or to other countries would increase the carbon footprint of the fisheries, likely exacerbating global warming.

For these reasons we strongly urge you to reject the joint petition by Environment California and Azul.

Sincerely,

Dr. Ed Parnell, Scripps Institution of Oceanography, University of California San Diego

Dr. Paul Dayton, Scripps Institution of Oceanography, University of California San Diego

Dr. Stephen Schroeter, Marine Science Institute, University of California Santa Barbara

Mr. Peter Halmay, President, San Diego Fishermen's Working Group

**Parnell PE, Lennert-Cody CE, Ladah LB, Riser KL, Bulach B, Leichter JJ, Latker AK, Schroeter SC, Dayton PK. Demography and dynamics of giant kelp cohorts across four decades: Lessons for conservation and resilience planning. Ecol Appl. 2026 Jan;36(1):e70181. doi: 10.1002/eap.70181. PMID: 41605549; PMCID: PMC12851851.**