California Fish and Game Commission

Meeting Binder

Volume 1

Staff Overview of MPA Items &

Agenda Items 2-4

May 5-6, 2026

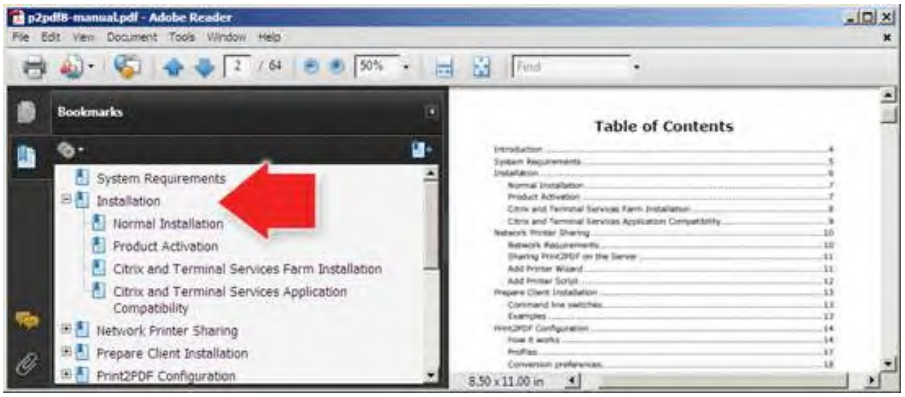
Goleta

EASY GUIDE TO USING THE BINDER

1. Download and open the binder document using portable document reader (pdf) software like Adobe Acrobat/Reader.

2. If a bookmark panel does not automatically appear on either the top or left side of the screen, click/tap on the “bookmark symbol” located near the top left-hand corner.

3. To make adjustments to the view, use the Page Display option in the View tab. You should see something like:



4. We suggest leaving open the bookmark panel to help you move efficiently among the staff summaries and numerous supporting documents in the binder. It’s helpful to think of these bookmarks as a table of contents that allows you to go to specific points in the binder without having to scroll through hundreds of pages.

5. You can resize the two panels by placing your cursor in the dark, vertical line ↔ located between the panels and using a long click /tap to move in either direction.

6. You may also adjust the sizing of the documents by adjusting the sizing preferences located on the Page Display icons found in the top toolbar or in the View tab.

7. Upon locating a staff summary for an agenda item, notice that you can obtain more information by clicking/tapping on any item underlined in blue.

8. Return to the staff summary by simply clicking/tapping on the item in the bookmark panel.

9. Do not hesitate to contact staff if you have any questions or would like assistance.

Introductions for California Fish and Game Commission Meeting

Commission Members

Eric Sklar	President (Saint Helena)
Darius W. Anderson	Vice President (Kenwood)
Jacque Hostler-Carmesin	Member (McKinleyville)
Samantha Murray	Member (La Jolla)
Erika Zavaleta	Member (Santa Cruz)

Commission Staff

Melissa Miller-Henson	Executive Director
David Thesell	Deputy Executive Director
Mike Yaun	Legal Counsel
Susan Ashcraft	Marine Advisor
Ari Cornman	Wildlife Advisor
Gabe Lopez	Program Manager
Sherrie Fonbuena	Administrative Officer, Regulatory Analyst
Caroline Newell	Environmental Scientist
Jenn Bacon	CESA and Regulatory Analyst
David Haug	Regulatory Analyst
Kelsey Leaird	Executive Analyst
Cynthia McKeith	Staff Services Analyst
Amanda Specht	California State Sea Grant Fellow
Jessica Shaw	Seasonal Clerk

California Department of Fish and Wildlife Staff

Meghan Hertel	Director
Chad Dibble	Deputy Director, Wildlife and Fisheries Division
Craig Shuman	Regional Manager, Marine Region
Eric Kord	Assistant Chief, Marine Enforcement
Claire Waggoner	District Habitat Enforcement Manager, Marine Region

Special guests who are present:

Overview of California Fish and Game Commission Meeting

- Welcome to a meeting of the California Fish and Game Commission. This is the 157th year of operation for the Commission, in partnership with the California Department of Fish and Wildlife. Both organizations originated from the Board of Fish Commissioners in 1870.

- The Commission's goals include preserving California's wildlife heritage and conserving our natural resources through informed decision making. These meetings play a vital role in achieving those goals. In that spirit, we provide the following information to support effective and efficient progress toward that end.

- We are operating under the Bagley-Keene Open Meeting Act and these proceedings are being recorded and broadcast.

- In the unlikely event of an emergency, please note the location of the nearest emergency exits at your location.

- Items may be heard in any order pursuant to the determination of the presiding commissioner, which is Commissioner Murray today.

- The amount of time for each agenda item may be adjusted based on time available and the number of speakers.

- If you are here at the in-person location, speaker cards need to be filled out **legibly** and turned in to staff **before** we start the agenda item.

- If you are online or on the phone, you will receive additional instructions in a few minutes.

- We will ask how many speakers we have before taking public comment; please be prepared and listen closely for your name or phone number to be called.

- When you speak, please state your name and any affiliation. Please be respectful and note that disruptions will not be tolerated. Time is precious so please be concise.

- To receive meeting agendas and regulatory notices about those subjects of interest to you, please visit the Commission's website, www.fgc.ca.gov, and sign up for our electronic mailing lists.

- If you want the Commission to consider a regulation change, all petitions for regulation change must be submitted in writing on the authorized form, FGC 1, which is available on the Commission's website or directly from staff.

- For members of the public, if you have access to the Internet and are not planning to make public comment, you may listen to the meeting via our regular webcast by visiting the commission website at www.fgc.ca.gov (link is on right side).

- **Reminder!** Please silence your mobile devices and computers to avoid interruptions.

Commissioners
Eric Sklar, President
Saint Helena
Darius Anderson, Vice President
Kenwood
Jacque Hostler-Carmesin, Member
McKinleyville
Samantha Murray, Member
La Jolla
Erika Zavaleta, Member
Santa Cruz

STATE OF CALIFORNIA
Gavin Newsom, Governor

Fish and Game Commission

Wildlife Heritage and Conservation
Since 1870

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Klamath River Basin and Central Valley Sport Fishing *and* Regional Marine Protected Area Petitions (San Luis Obispo through Santa Barbara Counties, including Northern Channel Islands and Santa Barbara Island)

Revised* Meeting Agenda
May 5-6, 2026

Hilton Garden Inn Santa Barbara/Goleta
6878 Hollister Avenue
Goleta, CA 93117

- **May 5** will focus on *Regional MPA Petitions (San Luis Obispo through Santa Barbara counties)*
- **May 6** will focus on *Klamath River Basin* and *Central Valley Sport Fishing and Regional MPA Petitions (Northern Channel Islands and Santa Barbara Island)*

Join us in person in Goleta to provide public comment or observe the meeting.

Options for Remote Public Comment via Zoom or Phone

To join the meeting remotely via Zoom (video and audio), click directly on the meeting link at https://us02web.zoom.us/j/89046108064. You can access detailed instructions for joining by phone or Zoom by clicking here or visit the Commission meetings page at fgc.ca.gov/meetings; for instructions on how to join by phone (audio only), refer to Option 3.

The Commission will make a reasonable effort to provide the public additional opportunities to observe or provide comment in the meeting through the Zoom webinar platform by computer, mobile device, or telephone connections. However, the Commission cannot guarantee the accessibility or functionality of the remote connection options. Should technical issues affect remote attendee access or webinar quality, an attempt will be made to resolve them; however, the meeting will continue with in-person attendees.

Option for Remote Observation Without Public Comment

To watch or listen only on the day of the meeting visit http://www.fgc.ca.gov (link is on the right side of the page). The Commission will make a reasonable effort to live-stream the meeting to allow the public to observe the meeting from a remote location without providing comments. However, the Commission cannot guarantee the accessibility or functionality of the webcast.

*** This agenda has been revised to:**

- **Amend the descriptions of Agenda Items 2-5 (Petitions 2023-28MPA, -29MPA, -19MPA, and -20MPA, respectively) to clarify the proposed petition actions and reflect the intent of tribal leads or co-leads as clarified during the April 14, 2026 Tribal Committee meeting.**
- **Amend the descriptions of Agenda Items 6, 8 and 11-14 (Petitions 2023-34MPA, -18MPA, -27MPA, -14MPA and -15MPA, respectively) to clarify the proposed petition actions.**
- **Renumber Agenda Item 8 (Petition 2023-18MPA) to sub-item 8(A).**
- **Add sub-item 8(B) to schedule Petition 2022-04, submitted by the City of Lompoc in 2022. The Commission referred the petition to the Department for review and subsequently requested that it be included in the Department's MPA petitions evaluations, which were presented at the Commission's April 2026 meeting. The petition was inadvertently omitted from this agenda and prior public materials; it is now included to ensure opportunity for public input within the context of the current MPA petition process.**

Meeting Goals, Expectations, and Format

The California Fish and Game Commission (Commission) is holding this meeting as one of three regional meetings (April 21, May 5-6, and May 19) to consider recently evaluated marine protected area (MPA) petitions. We expect to hear comments from people with varied perspectives and deeply held values about California's ocean and coastal places. In these meetings, the Commission is committed to supporting an environment where everyone can safely participate, while also protecting free speech. Meeting goals, expectations, and format information have been created to support a respectful, constructive environment where all voices are heard; we share them here to enhance transparency for regional meeting participants.

Regional Meeting Goals

- Provide a safe and inclusive environment for sharing knowledge, experiences, and perspectives..
- Uphold the Commission's Justice, Equity, Diversity, and Inclusion (JEDI) Policy and goals, including centering principles of environmental justice and access for underserved communities; recognizing and honoring the perspectives and traditional knowledge and practices of California tribes and tribal communities; and working from a shared understanding of key JEDI-related definitions and terms.
- Ensure all commissioners can hear and participate in petition dialogue in real time.
- Receive overview of petitions, ask questions, and discuss petitions and evaluations.

- Daylight areas of agreement or disagreement, as well as potential modifications and compromises.
- Gather input to inform Commission recommendations or make requests for additional information for future consideration.
- Deliberate on petition content without making final decisions, which will occur at later publicly noticed Commission meetings; real-time negotiation or resolution may not be possible within the meeting time.

Regional Meeting Expectations: Commitment to a Respectful Environment and Free Speech

We acknowledge that regional meeting participants care deeply about California's marine and coastal places and public trust resources. These meetings are intended to provide space to openly and respectfully share relevant information and perspectives on MPA petitions. The following content is intended to set expectations and tone for these meetings.

The Commission is committed to creating and maintaining an environment where all participants feel safe, respected, and able to contribute meaningfully. It therefore strongly discourages personal attacks, intimidation, harassment, hateful expressions (including racial or other identity-based comments), or other conduct that targets individuals rather than issues. These comments can diminish the quality of public dialogue, discourage community participation, and potentially reduce the likelihood that commissioners will give weight to comments delivered in this manner.

The Commission upholds the right to free speech. All individuals possess this right and are entitled to use their full speaking time to express their views, including critiques, alternative perspectives, and disagreement. However, disruptions to the meeting will not be tolerated. Profanity, obscenity, personal threats or attacks on members, staff or other commenters, references to protected characteristics, offensive speech, yelling, interruptions, audible and disruptive reactions, or disputing another speaker during their speaking time may constitute a disruption to the meeting, depending on the circumstances.

The Commission may restrict an individual's right to speak when necessary to avoid disrupting the orderly conduct of the meeting. In these cases, the presiding commissioner may gavel or mute a speaker's microphone. If the disruptive behavior continues, after a call for decorum and a warning, the person or people disrupting the orderly conduct of the meeting may be removed from the meeting, the meeting may be suspended, and the room may be cleared.

Regional Meeting Participation Logistics: Day of Engagement and Written Comments

Participating in Person, on Zoom, or by Phone

All meetings are subject to the Bagley-Keene Open Meeting Act and open to the public. Participation and comment are available in person, via Zoom webinar, or by phone; meetings are also live streamed for listening or viewing only. The presiding commissioner will explain how to indicate your interest in speaking and time limits. Staff are available to answer logistical questions. Audio and video archives are posted to the Commission website after each meeting.

To speak on an agenda item in-person, please complete a "speaker card" and provide it to the designated staff member before the agenda item is announced. Please complete one speaker card per agenda item. Cards will be available near the entrance of the meeting room. In-person speakers will be identified in groups; please line up when your name is called.

To speak on an agenda item via Zoom or phone, please "raise" your hand either through the Zoom function or by pressing *9 once on your phone when prompted at the beginning of the agenda item. Speakers on Zoom or phone will be identified by your display name or the last three digits of your phone number; listen closely for when your name or number is called.

Visual Presentations: Slides, Videos, and Graphics

All electronic presentations must be submitted by the Supplemental Comment Deadline and approved by the Commission executive director before the meeting.

- Electronic presentations must be provided by email to fgc@fgc.ca.gov. If the file is too large to send via email, contact staff to identify an alternative method for submitting the file.
- Specify to which meeting date and petition/geography it pertains.
- All electronic formats must be Windows PC compatible.
- If presenting at the in-person meeting location, it is recommended that you bring a print copy of your presentation in case of technical difficulties.
- Approval is at the discretion of the presiding commissioner and is not guaranteed.

Persons with Disabilities or Accommodation Needs

Individuals with disabilities and/or needing reasonable accommodation to participate in Commission meetings may contact the Civil Rights Office (CRO) of the California Department of Fish and Wildlife at civilrights@wildlife.ca.gov. Requests for facility or meeting accessibility and requests for American Sign Language interpreters should be submitted at least 72 hours before the meeting to help ensure that the requested accommodation can be met. If an accommodation is no longer needed, please notify CRO immediately.

Individuals relying on an interpreter are entitled to at least twice the allotted speaking time pursuant to Government Code Section 11125.7(c), and are asked to provide at least 72 hours' notice. Additional time for other accommodation needs may be granted at the presiding commissioner's discretion to ensure equal opportunity to address the Commission.

Written Public Comments and Submission Deadlines

The public is encouraged to submit written comments on any agenda item. Written comments can be more detailed than what you may have the opportunity to share with commissioners in verbal comments made during the meeting. If written comments are received before the deadline, they will be shared with Commissioners before the meeting; you may wish to refer to your full written comments during your verbal testimony at the meeting.

Submit written comments by one of three methods:

- E-mail to fgc@fgc.ca.gov
- Mail to California Fish and Game Commission, P.O. Box 944209, Sacramento, CA 94244-2090

- Deliver to California Fish and Game Commission, 715 P Street, 16th Floor, Sacramento, CA 95814 (call at least one business day in advance to arrange delivery)

Meeting Date	***Comment Deadline****	***Supplemental Comment Deadline****
May 5-6, 2026	April 22, 5:00 PM	April 30, 12:00 PM
May 5-6, 2026	May 6, 5:00 PM	May 14, 12:00 PM

* Written comments received at the Commission office by the ***Comment Deadline*** will be made available to the Commissioners prior to the meeting, made available to the public, and may be posted online with meeting materials.

** Written comments received at the Commission office by the ***Supplemental Comment Deadline*** will be made available to Commissioners at the meeting but not posted online.

After these deadlines, written comments may be delivered in person to the meeting. Please bring twelve (12) copies of written comments and hand them to the designated staff member just prior to speaking.

Regional Meeting Expectations: Agenda and Format

Meeting Agenda

The meeting agenda outlines the planned sequence of items, during which presentations, discussion, and public comment will occur. Each meeting includes a designated public comment period for each agenda item, as well as a "general public comment" agenda item for topics not on the agenda.

Meeting Format

For each regional meeting, the Commission will discuss from four to seven MPA petitions (with eight to fifteen proposed actions). Information on which petitions will be heard at which regional meetings is available in the petition distribution tables.

During regional meetings, each MPA petition agenda item will follow the same general format:

- Petitioner presentation for 10-12 minutes, depending on whether a petition is tribally led or co-led and on the number of nested actions within the petition, covering:
    - Regulatory actions requested
    - Purpose of requested action
    - Updates since petition was submitted in November 2023 or since amended in March 2025
    - A focus on regionally or locally relevant components, especially if a petition spans multiple regions
- Commission staff re-cap of evaluation recommendations
- Commissioner questions
- Ceded speaker time
- Public comment and Commission discussion

Regional Meeting Expectations: Guidelines on Speaker Time

Under Commission procedures, the presiding commissioner allocates a maximum speaking time (typically one to three minutes, with exceptions) for each agenda item. For the regional MPA petition meetings, the Commission aims to support a more flexible, conversational dialogue, whenever possible, to reflect the spirit of Marine Resources Committee meetings. The Commission understands that many participants travel long distances or rearrange commitments to attend, whether in person or remotely.

The Commission expects the regional meetings to be well attended, potentially with large numbers of speakers. The Commission is committed to hearing all scheduled petitions, while also maximizing the amount of information and number of viewpoints shared by attendees.

To balance these goals, the presiding commissioner will seek to ensure discussions are focused, respectful, and efficient, and that as many voices as possible can be heard. In that spirit, the presiding commissioner will specify a target maximum speaking time for those wishing to speak on a petition.

Tools the Presiding Commissioner May Use to Maximize Viewpoints Shared

To help participants prepare for regional meetings, we share here proposed speaker time guidelines, as well as other tools the presiding commissioner may use to manage large numbers of speakers on any given petition. Note that at any time, the presiding commissioner may choose to use these or other tools to focus comments and/or maximize participation. Please keep these guidelines in mind as you prepare your public comments.

- **If there are 25 or fewer speakers:** Speakers may be asked to speak for no more than **two to three minutes** each.
- **If there are more than 25 speakers*:*** Speakers may be asked to speak for no more than **one minute** each.

If there are large numbers of speakers for any petition: The presiding commissioner may also choose to rely on group sentiment tools to allow participants to indicate their views, when there is not enough time for all individuals to speak. These tools are strategies to broaden participation, not to limit viewpoints.

- **Levels-of-Support Checks:** Quick indicators such as “I like it,” “I can live with it,” or “I cannot support it”
- **Group Sentiment Capture:** Hand-raising or digital reactions when not everyone can speak individually
- **Time Management Adjustments:** Modifying pacing, structure, or feedback tools so all petitions can be addressed during the meeting

Additional Time for Speakers with Ceded Time

A speaker may be approved to speak for up to **three minutes if five or more** participants cede their time to them. This allows a group to designate spokespeople to provide comment on a specified MPA petition agenda item. Participants ceding their time:

- Must be present (in person or on Zoom) when the agenda item is called; and
- forego their own opportunity to speak on that agenda item.

If you plan to cede time:

- **In-person:** the five participants ceding their time must complete speaker cards and approach the staff table with the spokesperson before the agenda item begins so staff can confirm the presence of those ceding time.
- **Remote (via Zoom or phone):** participants who wish to cede their time must notify the Commission at fgc@fgc.ca.gov by the Supplemental Comment Deadline and include the name of the individual to whom they are ceding time. All individuals ceding time must also be present on Zoom or phone during the agenda item.

Considerations for Giving Effective Public Comment

When addressing the Commission, please give your name and the name of any organization you represent. To facilitate a positive meeting experience for all, please remember to:

- Respect the meeting environment, other speakers, staff, and commissioners, as outlined above.
- Treat all participants with courtesy and recognize diverse experiences.
- Listen respectfully; one person speaks at a time.
- Avoid personal accusations, stereotyping, or deliberate misinformation.
- Come prepared and keep comments centered on the topic.
- Focus on clear, concise contributions that support productive dialogue.
- If there are several speakers with the same concerns, you are encouraged to appoint a spokesperson and avoid repetitive comments.
- Treat disagreements as shared problems to solve.
- When offering critique, propose alternative ideas when appropriate.
- To help first-time participants organize comments, it may be helpful to focus on:
    - Do you support or oppose the petition and why?
    - Why is it important to you, your community, or your work?
    - What action(s) would you like the Commission to consider?

May 5, 2026; 8:00 AM

Call to Order and Roll Call to Establish a Quorum

1. Consider Approving Agenda and Order of Items

Discussion and Action Items: Marine Protected Areas

Marine Protected Area (MPA) Petitions *(San Luis Obispo County through mainland Santa Barbara County)*

For each MPA petition, receive presentations from the petitioner(s), followed by public comment and discussion. The Commission may develop recommendations for consideration at a future meeting. *No formal action will be taken today.*
(Pursuant to Section 662, Title 14, California Code of Regulations)

Viewing petitions and public comments:

- *MPA petitions and compiled public comments to date are available to view through the Commission's website at California Marine Protected Areas - Initial Webpage or Status of MPA Petitions for Reg Change (with the exception of Petition 2022-04).*

Viewing petition evaluations:

- *Department petition evaluations with recommendations are available to view through the Department's Bin 2 MPA Petition Evaluations StoryMap.*
- *A recording of the Department's presentation of MPA petition evaluations and recommendations, given during the April 15-16, 2026 Commission meeting, can be viewed by visiting the CAL-SPAN Network for April 15.*
- *California Ocean Protection Council petition policy letter (see Latest News dated March 20, 2026) and evaluations (date in June TBD) are available to view through OPC's website at California Ocean Protection Council.*

2. Petition 2023-28MPA_AM2 (Tribally Co-led)
Request to designate a new state marine conservation area (SMCA) near Point Sal — using boundaries proposed in November 2025 — that allows recreational take of finfish by hook and line from shore and take during mission-critical operations at Vandenberg Space Force Base, and to consult with tribes to identify a tribal name for the SMCA.

3. Petition 2023-29 MPA_AM1 (Tribally Co-led)
Request to designate a new MPA near Carpinteria as "Mishopshno SMCA" — using the slightly larger proposed boundaries — that allows recreational take of finfish by hook and line from shore, and includes a tribal take exemption for the Santa Ynez Band of Chumash Indians.

4. Petition 2023-19MPA (Tribally Led)
Request to designate a new MPA near Morro Bay as "Chitqawi SMCA" that only includes a tribal take exemption for the Santa Ynez Band of Chumash Indians.

5. Petition 2023-20MPA (Tribally Led)
Request to expand a boundary at Point Buchon State Marine Reserve (SMR), and to re-name Point Buchon SMCA as the Chumash Co-Managed SMCA and add a tribal take exemption for the Santa Ynez Band of Chumash Indians.

6. Petition 2023-34MPA
Request to change the classification of Point Buchon SMCA to an SMR**.**

7. Petition 2023-33MPA_AM1
Request to expand a boundary at Point Conception SMR**.**

8. Petition 2023-18MPA and Petition 2022-04

(A) **Petition 2023-18MPA**
Request to change the classification of a portion of Vandenberg SMR by creating a narrow, nearshore **"**ribbon**"** SMCA, along the entire SMR length, to allow recreational take of finfish by hook and line from shore; make non-regulatory changes at two MPAs; and simplify take regulations at Kashtayit SMCA

(B) **Petition 2022-04**
Request to change the classification of a portion of Vandenberg SMR by creating a narrow**,** nearshore **"**ribbon**"** SMCA along the half-mile stretch of beach known as Surf Beach, to allow recreational take of finfish by hook and line from shore**.**

Note: Petition 2022-04 was submitted prior to the 2023 MPA petitions process. The Commission referred the petition to the Department for review in 2022 and subsequently requested it be included in the Department's MPA petitions evaluations, which were presented at the Commission's April 2026 meeting. The petition is included here to ensure opportunity for public input within the context of the current MPA petition process..

Recess

May 6, 2026; 8:00 AM

Call to Order and Roll Call to Establish a Quorum

Discussion and Action Items – Sport Fishing

9. Central Valley Sport Fishing
Consider adopting proposed amendments to Central Valley sport fishing regulations and taking final action under the California Environmental Quality Act. (Amend subsections 7.40(b)(4), (43), (66) and (80), Title 14, California Code of Regulations)

10. Klamath River Basin Sport Fishing
Consider adopting proposed amendments to Klamath River Basin sport fishing regulations and taking final action under the California Environmental Quality Act. (Amend subsection 7.40(b)(50), Title 14, California Code of Regulations)

Discussion and Action Items - MPAs

MPA Petitions (northern Channel Islands and Santa Barbara Island)
For each MPA petition, receive presentations from the petitioner(s), followed by public comment and discussion. The Commission may develop recommendations for consideration at a future meeting. *No formal action will be taken today*.
(Pursuant to Section 662, Title 14, California Code of Regulations)

Viewing petitions and public comments:

- *MPA petitions and compiled public comments to date are available to view through the Commission's website at California Marine Protected Areas - Initial Webpage or Status of MPA Petitions for Reg Change (with the exception of Petition 2022-04).*

Viewing petition evaluations:

- *Department petition evaluations with recommendations are available to view through the Department's Bin 2 MPA Petition Evaluations StoryMap.*
- *A recording of the Department's presentation of MPA petition evaluations and recommendations, given during the April 15-16, 2026 Commission meeting, can be viewed by visiting the CAL-SPAN Network for April 15.*
- *California Ocean Protection Council petition policy letter (see Latest News dated March 20, 2026) and evaluations (date in June TBD) are available to view through OPC's website at California Ocean Protection Council.*

11. Petition 2023-18MPA
Request to remove San Miguel Island Special Closure; remove the area of Frenchy's Cove from the brown pelican Anacapa Island Special Closure, and consider removing the 20-foot net-and-trap depth closure at Anacapa Island Special Closure**.**

12. Petition 2023-27MPA_AM1
Request to modify Anacapa Island SMCA or Anacapa Island Special Closure to protect eelgrass meadows through one of three options related to disallowing deployment of lobster traps in part or all of the SMCA or increasing the special closure depth restriction**.**

13. Petition 2023-14MPA
Request to allow commercial take of red sea urchins in Naples SMCA and Anacapa Island SMCA**.**

14. Petition 2023-15MPA_AM2
Request to change the classification of Footprint SMR, Santa Barbara Island SMR, and Gull Island SMR to SMCAs to allow take of pelagic finfish species through one of several options**.**

15. Petition 2023-33MPA_AM1
Request to expand the boundaries of Gull Island SMR and South Point SMR.

16. Future Meetings and New Business

Review logistics and agenda items for the next Commission meeting (May 19). Consider any changes to previously approved meeting dates or locations and introduce any new business for inclusion on a future meeting agenda.

General Public Comment

17. General Public Comment for Items Not on the Agenda

Receive public comment regarding topics within the Commission's authority that are not included on the agenda.

Note: The Commission may not discuss or take action on any matter raised during this item, except to decide whether to place the matter on the agenda of a future meeting (sections 11125 and 11125.7(a), Government Code).

Adjourn

California Fish and Game Commission
Meeting Schedule

Note: As meeting dates and locations can change, please visit www.fgc.ca.gov for the most current list of meeting dates and locations. All Commission meetings will include a webinar/teleconference option for attendance, and every effort will be made to ensure that committee meetings include the same.

Meeting Date	Commission Meeting	Committee Meeting
May 14, 2026		**Wildlife Resources** Natural Resources Headquarters Building 715 P Street, 2nd Floor Sacramento, CA 95814
May 19, 2026	**Marine Protected Area Petitions** (Los Angeles through San Diego counties, including Santa Catalina Island) Holiday Inn Express 35 Via Pico Plaza San Clemente, CA	
June 17-18, 2026	Natural Resources Headquarters Building 715 P Street, 2nd Floor Sacramento, CA 95814	
July16, 2026		**Marine Resources** Natural Resources Headquarters Building 715 P Street, 2nd Floor Sacramento, CA 95814
August 11, 2026		**Tribal** Natural Resources Headquarters Building 715 P Street, 2nd Floor Sacramento, CA 95814
August 12-13, 2026	Natural Resources Headquarters Building 715 P Street, 2nd Floor Sacramento, CA 95814	
September 10, 2026		**Wildlife Resources** Natural Resources Headquarters Building 715 P Street, 2nd Floor Sacramento, CA 95814
October 14-15, 2026	Natural Resources Headquarters Building 715 P Street, 2nd Floor Sacramento, CA 95814	

Meeting Date	Commission Meeting	Committee Meeting
November 12, 2026		**Marine Resources** Natural Resources Headquarters Building 715 P Street, 2nd Floor Sacramento, CA 95814
December 15, 2026		**Tribal** Natural Resources Headquarters Building 715 P Street, 2nd Floor Sacramento, CA 95814
December 16-17, 2026	Natural Resources Headquarters Building 715 P Street, 2nd Floor Sacramento, CA 95814	

Other Meetings of Interest

Meetings listed here are organizations for which the Commission: (1) is a member, or (2) takes action based upon regulations developed by that organization.

Association of Fish and Wildlife Agencies

- September 13-16, 2026 – Lancaster, PA

Pacific Fishery Management Council

- June 11-16, 2026 – Spokane, WA
- September 17-22, 2026 – Vancouver, WA
- November 13-18, 2026 – Garden Grove, CA
- December 31, 2026 – Location TBD

Pacific Flyway Council

- August or September 2026 – Date and location TBD

Western Association of Fish and Wildlife Agencies

- June 1-5, 2026 – Boise, ID

Wildlife Conservation Board

- May 28, 2026 – Sacramento, CA
- August 27, 2026 – Sacramento, CA
- November 19, 2026 – Sacramento, CA

Introduction to Regional Bin 2 Marine Protected Area Petitions and Evaluations

Today's Item **Information ☒** **Action ☐**

This regional meeting focuses on marine protected area (MPA) petitions from Del Norte County through Monterey County. For each petition, the Commission will receive presentations from MPA petitioner(s), ask clarifying questions, receive community input, and discuss petitioned actions and recommendations. The Commission may develop recommendations for consideration at a future meeting. No formal action will be taken today.

This staff summary provides an overview and background relevant to the six petitions and regional actions listed under Agenda Item 3 as sub-items (3A – 3F).

Summary of Previous/Future Actions

• Received 20 MPA petitions	December 2023
• Referred 20 MPA petitions to Marine Resources Committee (MRC) and Department for review and recommendation	February 2024
• Approved MRC recommendation for sorting MPA petitions and evaluating individual actions within "binned" petitions, and supported scheduling consideration of individual actions as recommendations were ready	August 2024
• MRC received Department recommendations for individual actions proposed in 5 "bin 1" MPA petitions and developed MRC recommendations; recommendations adopted by Commission	November 2024; MRC and December 2024
• Petitioners for the 15 "bin 2" petitions afforded an opportunity to amend petitions	December 2024 – March 2025
• MRC received Department proposal for bin 2 petition evaluation framework and developed recommendations for grouping the 15 MPA petitions in bin 2 for future review and discussion	July 16-17, 2025; MRC
• Received and approved MRC recommendation for the bin 2 petition evaluation framework, with one modification related to a question about tribal leadership/sponsorship of petitions	August 13-14, 2025
• Tribal Committee (TC) received overview from tribal leads or co-leads of 5 MPA petitions; received Department presentation, and developed TC recommendation	April 14, 2026; TC

• Approved TC recommendation for Department to evaluate 5 *revised* tribally led or co-led petitions *as proposed on April 14;* received Department bin 2 petition evaluations for 10 non-tribally led or co-led petitions	April 15-16, 2026
• **At San Mateo regional MPA meeting, receive petitioner presentations, ask clarifying questions, receive community input, and discuss region-specific petitioned actions in 6 MPA petitions**	**April 21, 2026**
• At Goleta regional MPA meeting, receive petitioner presentations, ask clarifying questions, receive community input, and discuss region-specific petitioned actions in 15 MPA petitions (7 petitions on May 5; 8 petitions on May 6)	May 5–6, 2026
• At San Clemente regional MPA meeting, receive petitioner presentations, ask clarifying questions, receive community input, and discuss region-specific petitioned actions in 4 MPA petitions	May 19, 2026

Background

In early 2023, the state completed the first 10-year review of the statewide MPA network and management program. The “decadal management review” (known as the DMR) generated significant public interest in contributing to adaptive management of the network, including through public proposals to modify existing MPAs or management approaches. In response, the Commission agreed to accept public proposals using its existing process for public petitions for regulation change. The Commission set a submission deadline for late November 2023 for receipt at the December 2023 Commission meeting.

In November 2023, the Commission received 20 petitions proposing modifications to MPAs or new MPAs. By late 2024, the Commission acted on five of the petitions—categorized as “bin 1” for near-term evaluation—leaving 15 “bin 2” petitions for additional evaluation under a bin 2 evaluation framework approved by the Commission.

Petition Amendments (Formal and Informal)

Bin 2 petitioners were provided an opportunity until March 2025 to submit formal amendments to their original petitions, to be integrated into evaluations to be conducted by the Department. Since the March 2025 amendment deadline, several petitioners have identified additional requested changes for the Commission’s awareness, noting these revisions respond to community concerns or, in one case, input from the U.S. Department of Defense.

For tribally led or co-led petitions, the Commission provided additional time for the Department to consult with tribes and for California tribes to formally join petitions as co-sponsors. The Commission also requested that tribally led or co-led petitions be discussed at the April 14, 2026 Tribal Committee (TC) meeting and potentially provide a recommendation to the Commission.

For non-tribally led petitions, the Commission supported the Department's and staff's request to not incorporate additional, informal, post-deadline amendments into the evaluation process. Instead, petitioners were asked to describe any proposed changes not reflected in their original or amended petitions during regional MPA petition meetings, scheduled for after Department evaluations were released.

Department Evaluations

On March 20, 2026, the Department released its evaluations and recommendations for 10 of the 15 petitions — those not led or co-led by tribes or tribal communities. The Department's evaluations were informed in part by Commission staff's work on two evaluation questions. The materials released included a Department transmittal memo (Exhibit 1), a petition evaluation companion document (Exhibit 2) with supplemental information and additional context across the petition evaluations, and petition-specific analyses (see exhibits for staff summaries 3A – 3F). The documents generated substantial public interest, with approximately 20 substantive comment letters received in advance of the Commission's April 15-16, 2026 meeting.

At the Commission's April 2026 meeting, the Department presented a summary of its evaluations and recommendations (see Exhibit 3 for presentation slides) for all proposed actions associated with the 10 non-tribal petitions; this provided the Commission an opportunity to hear a consolidated overview, ask clarifying questions, and receive additional public input. There is a Zoom recording of the Department presentation and public/Commission discussion.

Evaluations for the five tribally led or co-led petitions are currently in development. Consistent with the Commission's request, the Department attended the April 14, 2026 TC meeting to hear presentations from tribal leads and co-leads and to seek guidance before completing its evaluations. The tribal leads and co-leads of the five petitions shared their goals, updates, clarifications, and any desired revisions to the original petitions. Participants and TC discussed proceeding with evaluating the five tribally led/co-led bin 2 petitions as described at the meeting. During the April 15-16, 2026 Commission meeting, the Commission adopted the TC recommendation to formally accept clarifications and revisions to three of the tribally-led or co-led petitions, and requested the Department proceed with evaluating the petitions with revisions incorporated.

Input from California Ocean Protection Council (OPC)

In addition to the Department's evaluations, the executive director of the California Ocean Protection Council (OPC), on behalf of OPC Chair and Secretary for Natural Resources Wade Crowfoot, submitted a letter to the Commission (Exhibit 4) providing input on proposals to adaptively manage California's MPA network, with the stated intent to complement the Department's evaluations. The letter highlights OPC's unique policy role in California's MPA network, supporting adaptive management, using MPAs to protect full ecosystems, prioritizing tribal stewardship, and supporting thriving fishing communities and climate-resilient fisheries. In the near future, OPC plans to provide specific input on the petitions using a policy lens that can complement the Department's assessment completed using questions and criteria

established by the Commission. OPC now anticipates transmitting its input for the June 2026 Commission meeting.

Regional Meetings

The Department's evaluation and recommendation presentation, TC discussion and input on tribally led and co-led petitions, and public input on both has helped lay the foundation for robust public dialogue at the regional scale in three regionally-located public meetings.

The Commission is commencing this regional meeting as one of three — April 21, May 5–6, and May 19 — to hear from petitioners and the public on bin 2 MPA petitions, including both the Department-evaluated petitions and the tribally led or co-led petitions still under review. The meetings are designed to provide petitioners an opportunity to present their petitions, describe any proposed changes since the March 2025 amendment deadline, and engage in dialogue with the Commission alongside robust public participation.

Additional information about the petitions and regional meetings is available on the Commission's website, including:

- the MPA petitions process webpage outlining the public process for reviewing 2023 MPA petitions and providing key resource links;
- the MPA petitions index, with access to each 2023 MPA petition and compiled public comments received since December 2023;
- regional MPA meeting agendas and materials; and
- regional meeting goals and participation guidelines.

For petition-specific information, public comments, and Department evaluations, see individual exhibits under agenda items 3A – 3F for today's meeting.

Exhibits

1. Department memo transmitting evaluations for non-tribally led or co-led MPA petitions, received March 20, 2026
2. Department "2023 Decadal Management Review Marine Protected Area Petition Evaluation Companion Document" for completed MPA petition evaluations, dated March 20, 2026
3. Department presentation from Agenda Item 2, Commission April 15-16, 2026 meeting (*for background purposes only*)
4. Letter from Jenn Eckerle, Executive Director, California Ocean Protection Council, and Deputy Secretary for Oceans, California Natural Resources Agency, received March 20, 2026

Motion (N/A)

Staff Summary for May 5-6, 2026

2. Marine Protected Area (MPA) Petition 2023-28MPA_AM2 (*Tribally Co-Led*)

Today's Item **Information ☒** **Action ☐**

Receive a presentation from the petitioner, followed by public comment and discussion for Petition 2023-28MPA_AM2: Request to designate a new state marine conservation area (SMCA) near Point Sal — using boundaries proposed in November 2025 — that allows recreational take of finfish by hook and line from shore and take during mission-critical operations at Vandenberg Space Force Base, and to consult with tribes to identify a tribal name for the SMCA.

Summary of Previous/Future Actions

• Received 20 MPA petitions; referred to MRC and the Department for review	December 2023; February 2024
• Granted or denied all individual actions in the 5 "bin 1" MPA petitions	December 2024
• Tribal Committee (TC) received overview from tribal leads or co-leads for 5 MPA petitions; received Department presentation, and developed TC recommendation	April 14, 2026; TC
• Received Department bin 2 petition evaluations for 10 non-tribally led or co-led petitions; adopted TC recommendation for tribally led and co-led petitions	April 15-16, 2026
• Received petitioners' presentations and discussed region-specific petitioned actions in bin 2 MPA petitions, from Del Norte through Monterey counties	April 21, 2026
• **Today, receive petitioners' presentation and discuss region-specific petitioned actions in bin 2 MPA petitions, from San Luis Obispo through Santa Barbara counties, northern Channel Islands, and Santa Barbara Island**	**May 5-6, 2026**
• Receive petitioners' presentation and discuss region-specific petitioned actions in bin 2 MPA petitions, from Los Angeles through San Diego Counties and Catalina Island	May 19, 2026
• Receive Department bin 2 evaluations for 5 tribally led or co-led petitions	Date to be determined

Background

In November 2023, the Commission received Petition 2023-28MPA, alongside 19 other petitions proposing changes to the state's MPA network and management program. In February 2024, the Commission referred all MPA petitions to the Department for its evaluation and recommendation, while developing and updating guidance over time. For a detailed background and key documents on the process leading to this point, including a Department companion document to the non-tribally led or co-led evaluations, the Department's evaluations presentation, and a letter from the California Ocean Protection Council with input

to the Commission complement the Department evaluations, see the *Introduction to Bin 2 MPA Petitions staff summary and exhibits*.

Petition Amendments

Bin 2 petitioners were provided until March 2025 to submit formal amendments to their original petitions for inclusion in the Department's evaluation. While the original 2023 petition (2023-28MPA) proposed a state marine reserve (SMR), this petitioner submitted a formal amendment (AM1) by the deadline to modify the proposed classification from an SMR to a SMCA and to add a proposed take allowance, based on community feedback.

In August 2025, the Commission extended the timeframe for California tribes to formally join petitions as co-sponsors and allow tribes to contribute additional modifications as needed to their petitions. The Commission also referred all tribally led or co-led petitions to TC for review prior to Commission review.

In November 2025, the Northern Chumash Tribal Council (NCTC) and the petitioner notified the Commission that NCTC had joined as a co-sponsor of the amended Petition 2023-28, thereby formalizing the petition as tribally co-led, and submitted a second amendment to the petition (AM2). As part of AM2, the co-petitioners also requested a modification, identified as a priority by the Vandenberg Space Force Base, to shift the proposed southern boundary northward by approximately one mile to avoid overlap with critical base assets.

The second amended petition (2023-28MPA_AM2) is provided in Exhibit 1.

TC Petitions Review

At the April 14, 2026 TC meeting, tribal petitioners provided verbal and/or PowerPoint summaries and clarifications of their petition proposals. For a Zoom-recorded video of the meeting, see Tribal Committee Meeting - April 14, 2026 - via YouTube. Through the discussions, it became clear that the intended actions for three of the five tribally led or co-led petitions differed from their previous submissions.

For Petition 2023-28MPA_AM2, the tribal co-lead confirmed that their stated intent and proposed actions remain consistent with the second amended petition submitted in November 2026. The co-lead also requested that the Commission accept the proposed southern boundary adjustment and the incidental take allowance supported by Vandenberg Space Force Base (see Exhibit 3 for the NCTC presentation); TC supported this request.

At its April 15–16, 2026 meeting, the Commission approved TC's recommendation to accept the clarified intents for the tribally led and co-led petitions, based on the information share by tribal leads and co-leads at the April 14 TC meeting. The Commission also requested that the Department proceed with evaluating the five tribally led or co-led petitions, incorporating the clarifications and revisions shared at the TC meeting.

Overview of Actions in Petition 2023-28MPA_AM2 Relevant to This Region

This amended petition, submitted by the Natural Resources Defense Council (NRDC) and co-led by NCTC, proposes to establish a new SMCA located in this region:

Action 1. Designate a new SMCA (9.18 square miles) at Point Sal in Santa Barbara County that prohibits take except for recreational take of finfish by hook-and-line from shore and take incidental to mission-critical military operations of the adjacent Vandenberg Space Force Base; and name the MPA with a Chumash place name to be identified through consultation with the Chumash people.

The petitioner also requests to establish a co-management agreement between NCTC, other Chumash tribes, and the Department (*note that this does not require a regulatory change*).

Stated Intent

In summary, the petitioners state that the proposed MPA would recognize that, "Point Sal is located in Chumash ancestral territory, and holds historic and cultural significance to Chumash people." They note that the area lies within the newly designated Chumash Heritage National Marine Sanctuary — a recently designated federal marine protected area that the petitioner highlights was, "proposed and championed by NCTC." The petitioners emphasize that establishing the MPA would provide, "strong protections for the sacred and culturally important waters of Point Sal." The petitioners also emphasized that the proposal would, "… advance Tribal co-stewardship and MPA management through a collaborative approach with NCTC." From a conservation perspective, the petitioners believe that the proposed MPA would be, "…sufficiently protective of critical conservation features…such as Lion's Rock, persistent kelp forest habitat, biologically important areas for cetaceans and porpoises, and the larval retention zone on the leeward side of Point Sal" while "...as amended still meet[ing] minimum size and shoreline extent guidelines." (See Exhibit 1 for more details.)

Public Comments

The Commission has received public comments on MPA petitions on an ongoing basis since they were submitted in late 2023. Staff has compiled into a single packet the comments related to this petition that were included in Commission or committee meeting binders or supplemental handouts from the December 2023 through April 2026 Commission meetings (Exhibit 2). Comments received after the April 2026 Commission meeting but before the deadline for this meeting are included as exhibits to this staff summary.

Petition Evaluations

On March 20, 2026, the Department publicly released its evaluations and recommendations for the ten petitions that were not tribally led or co-led. Evaluations for the five tribally led or co-led petitions, including the petition addressed in this item, have not yet been completed. The Commission supported the Department's decision to defer evaluation of tribally led or co-led petitions to allow time for government-to-government consultation with tribes and for TC to review and discuss those petitions at its April 14, 2026 meeting.

In addition, on March 20, 2026 the California Ocean Protection Council (OPC), in its role as policy lead for the MPA network, sent a letter to the Commission outlining its overarching perspectives on the MPA petitions, including the tribally led and co-led petitions (see OPC news release, dated March 20, 2026). OPC indicated that it plans to provide more detailed input on the bin 2 petitions using a policy lens intended to complement the Department's

evaluations. OPC now anticipates transmitting its evaluation for consideration at the June 2026 Commission meeting.

Today's Meeting

Today, the petitioner(s) will present Petition 2023-28MPA_AM2. This meeting provides petitioners with an opportunity to engage in dialogue with the Commission alongside robust public participation.

All participants are encouraged to review the Regional Meeting Expectations and Guidelines (included in the agenda) as a reference for engaging in today's meeting.

Significant Public Comments

1. The Santa Barbara County Action Network (SBCAN) supports petitions 2023-28MPA and 2023-29MPA, stating that both Point Sal and Mishopshno MPAs would conserve essential habitats that support rich biodiversity, strengthen the Chumash peoples' stewardship of a culturally significant area, provide benefits to the coastal economy through recreation and tourism, and would help fill a current gap in the MPA network design and improve ecological connectivity. (Exhibit 3)
2. The Guadalupe-Nipomo Dunes Center transmits handwritten cards and drawings from local students who support the Point Sal SMCA; samples included. The students urge the Commission to protect Point Sal's biodiversity. (Exhibit 4)
3. Two marine scientists from the University of California Santa Barbara support the petition, stating that the Point Sal SMCA would help to advance California's tribal marine stewardship goals and protect important marine life and habitats that are exposed to local stressors not currently protected by Point Buchon SMR/SMCA and Vandenberg SMR. The commenters also describe the overall benefits that MPAs provide more broadly pointing to ecosystem benefits, spillover for fisheries, ecosystem resilience for environmental perturbations such as marine heatwaves, and providing benefits to the local eco-tourism and recreation industries. (Exhibit 5)
4. A Santa Barbara resident supports the petition, stating that the proposed location for the Point Sal SMCA is ecologically important by providing a variety of habitat types to support diverse ocean life and that the designation would enhance the tribal stewardship in the area as well as protect important present-day and historical sites for the Chumash people (Exhibit 6).
5. The Ventura County Commercial Fishermen's Association (VCCFA) opposes the petition and offers several concerns, including the lack of a comprehensive socioeconomic analysis and the absence of an evaluation of regional impacts, such as fishing effort displacement for fishermen operating out of Morro Bay, Santa Barbara, Ventura, Channel Islands Harbor, and Los Angeles/Long Beach. VCCFA emphasizes that closures may appear to have a small impact, but a closure at a place like Point Sal would impact fishing operations and redistribute fishing effort. (Exhibit 7)
6. A recreational angler and diver from northern California who frequently recreates along the central coast, shares their position on all petitions scheduled for discussion at the May 5-6, 2026 meeting. The commenter urges the Commission to deny Petition

2023-28 MPA because the location is already protected by the Chumash Heritage National Marine Sanctuary and, therefore, would not be helping increase California's 30x30 goals, and the remote aspect of this location serves as a refuge to fishers because it is only possible to fish in the area when the water is calm (Exhibit 8).

7. A group of 42 diverse non-governmental organizations (tribal, cultural, environmental, shore fishing access, conservation, and others) submit a joint letter in support of the petition highlighting that the Point Sal SMCA would help to advance California's tribal marine stewardship goals – emphasizing their support of tribal co-management and the important opportunity for adaptive management it presents; increase overall MPA network connectivity, protect biodiversity and critical habitat, create an area where both land and sea are conserved, and support local, as well as network-wide, resilience to the impacts of climate change and growing ocean threats. The commenters highlight that the other local MPAs in the area — the Point Buchon SMR/SMCA complex and Vandenberg SMR — do not provide enough protection to the local sea life and that an MPA at Point Sal would alleviate local stressors. (Exhibit 9)

Recommendation

Commission staff: Based on the day's discussion, consider what additional information, if any, will be needed to inform a Commission decision on the petition.

Department: Currently under development.

Exhibits

1. Petition 2023-28MPA_AM2, received November 24, 2026
2. Packet of comments, received November 2023 through April 17, 2026
3. Email from Jeanne Sparks and Ken Hough, co-executive directors, Santa Barbara County Action Network, received April 9, 2026
4. Email from Saule Baipsys, Outreach Coordinator and Educator, Guadalupe-Nipomo Dunes Center, transmitting 47 handwritten student letters (a sample included), received April 15, 2026
5. Letter from Dr. Douglas McCauley, Director, and Molly Morse, Senior Manager, Benioff Ocean Science Laboratory University of California Santa Barbara, received April 20, 2026
6. Email from Bill Woodbridge, received April 21, 2026
7. Letter from David Colker, Executive Director, Ventura County Commercial Fishermen's Association, received April 21, 2026
8. Email from Rick Duenas, received April 22, 2026
9. Joint letter from 42 diverse non-governmental organizations (tribal, cultural, environmental, fishing access, and conservation), received April 22, 2026

Motion (N/A)

Staff Summary for May 5-6, 2026

3. Marine Protected Area (MPA) Petition 2023-29MPA_AM1

Today's Item **Information ☒** **Action ☐**

Receive a presentation from the petitioner, followed by public comment and discussion for Petition 2023-29MPA_AM1: Request to designate a new MPA near Carpinteria as "Mishopshno SMCA" that allows recreational take of finfish by hook and line from shore, and includes a tribal take exemption for the Santa Ynez Band of Chumash Indians.

Summary of Previous/Future Actions

• Received 20 MPA petitions; referred to MRC and the Department for review	December 2023; February 2024
• Granted or denied all individual actions in the 5 "bin 1" MPA petitions	December 2024
• Tribal Committee (TC) received overview from tribal leads or co-leads of 5 MPA petitions; received Department presentation, and developed TC recommendation	April 14, 2026; TC
• Received Department bin 2 petition evaluations for 10 non-tribally led or co-led petitions; adopted TC recommendation for tribally led and co-led petitions	April 15-16, 2026
• Received petitioners' presentations and discussed region-specific petitioned actions in bin 2 MPA petitions, from Del Norte through Monterey counties	April 21, 2026
• **Today, receive petitioners' presentation and discuss region-specific petitioned actions in bin 2 MPA petitions, from San Luis Obispo through Santa Barbara counties, northern Channel Islands, and Santa Barbara Island**	**May 5-6, 2026**
• Receive petitioners' presentation and discuss region-specific petitioned actions in bin 2 MPA petitions, from Los Angeles through San Diego Counties and Catalina Island	May 19, 2026
• Receive Department bin 2 evaluations for 5 tribally led or co-led petitions	Date to be determined

Background

In November 2023, the Commission received Petition 2023-29MPA, alongside 19 other petitions proposing changes to the state's MPA network and management program. In February 2024, the Commission referred all MPA petitions to the Department for its evaluation and recommendation, while developing and updating guidance over time. For a detailed background and key documents on the process leading to this point, including a Department companion document to the non-tribally led or co-led evaluations, the Department's evaluations presentation, and a letter from the California Ocean Protection Council with input to the Commission to complement the Department evaluations, see the *Introduction to Bin 2 MPA Petitions staff summary and exhibits*.

Petition Amendments

Bin 2 petitioners were provided until March 2025 to submit formal amendments to their original petitions for inclusion in the Department's evaluation. The co-petitioners for this petition submitted a formal amendment (AM1) by the March 2025 deadline (Exhibit 1; 2023-29_AM1), which reduced the original proposed MPA size and added a proposed take allowance.

In August 2025, the Commission extended time for California tribes to formally join petitions as co-sponsors and to allow tribes to contribute additional modifications as needed to their petitions. The Commission also referred all tribally led or co-led petitions to TC for review prior to Commission review.

In October 2025, the petitioners for this tribally co-led petition submitted a corrected narrative for the amended petition, including a correction to the location of the amended boundary to support design feasibility. The co-petitioners requested the Commission accept the minor boundary correction, which results in a proposed MPA of 9.05 square miles, slightly larger than the first amended version.

The corrected petition narrative and boundary for the amended petition (2023-29MPA_AM1) is provided in Exhibit 2.

TC Petitions Review

At the April 14, 2026 TC meeting, tribal petitioners provided verbal and/or PowerPoint summaries and clarifications of their petition proposals. For a Zoom-recorded video of the meeting, see Tribal Committee Meeting - April 14, 2026 - via YouTube.

Through the discussion, it became clear that the intended actions for three of the five tribally led or co-led petitions differed from their previous submissions.

For Petition 2023-29MPA_AM1, the tribal co-lead provided a verbal overview of the proposed MPA and confirmed that their stated intent and proposed actions remain largely consistent with the amended petition submitted in March 2025, but requested to include the boundary correction included in their October 2025 update (Exhibit 2). TC supported this request.

At its April 15–16, 2026 meeting, the Commission approved TC's recommendation to accept the clarified intents for the tribally led and co-led petitions, based on the information share by tribal leads and co-leads at the April 14 TC meeting. The Commission also requested that the Department proceed with evaluating the five tribally led or co-led petitions, incorporating the clarifications and revisions shared at the TC meeting.

Overview of Actions in Petition 2023-29MPA_AM1 Relevant to This Region

This amended petition, submitted by the Natural Resources Defense Council (NRDC), with tribal co-lead Santa Ynez Band of Chumash Indians (SYBCI) and co-sponsor Environmental Defense Center (EDC), proposes to establish a new MPA located in this region. Strikethrough and bold in Exhibit 2 reflects changes between the AM1 version of the petition and the updated corrections provided by the petitioners:

Action 1. Designate a new MPA as “Mishopshno SMCA” (**9.05** square miles) near Carpinteria, Santa Barbara County, that prohibits take except for recreational take of finfish by hook-and-line from shore, and includes a tribal take exemption for SYBCI.

The petitioner also requests to establish a co-management agreement between the SYBCI and the Department (*note: this does not require a regulatory change*).

Stated Intent

In summary, the petitioners state that their proposal is intended to:

> “1) help meet the Master Plan’s size and spacing guidelines for spacing between protected habitats, promoting connectivity in the network and representation of habitat types, 2) protect habitat attractive to marine wildlife, such as juvenile white sharks, and 3) honor the nearby historical Mishopshno village and cultural heritage of the Chumash in the area and restore management to the SYBCI of this portion of coastal waters”.

The petition also states a goal of a co-management agreement for “…continued access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for all Chumash people.”

Petitioners note that their amended petition would, “Allow for the recreational take of finfish from shore using hook-and-line, promoting access to certain important marine and cultural resources for all Chumash people – including non-federally recognized Tribes: and for the broader public”; and “Reduce the SMCA in size”, by adjusting boundaries to keep “Armpit Reef, the easternmost edge of Carpinteria Reef, and the eastern portion of the kelp forest associated with Carpinteria Reef, outside of the MPA’s boundaries”, thereby maintaining “recreational and commercial fishing access to certain important local fishing grounds.”

See exhibits 1 and 2 for additional details.

Public Comments

The Commission has received public comments on MPA petitions on an ongoing basis since they were submitted in late 2023. Staff has compiled into a single packet the comments related to this petition that were included in Commission or committee meeting binders or supplemental handouts from the December 2023 through April 2026 Commission meetings (Exhibit 2). Comments received after the April 2026 Commission meeting but before the deadline for this meeting are included as exhibits to this staff summary.

Petition Evaluations

On March 20, 2026, the Department publicly released its evaluations and recommendations for the ten petitions that were not tribally led or co-led. Evaluations for the five tribally led or co-led petitions, including the petition addressed in this item, have not yet been completed. The Commission supported the Department’s decision to defer evaluation of tribally-led or co-led petitions to allow time for government-to-government consultation with tribes and for TC to review and discuss those petitions at its April 14, 2026 meeting.

In addition, on March 20, 2026 the California Ocean Protection Council (OPC), in its role as policy lead for the MPA network, sent a letter to the Commission outlining its overarching perspectives on the MPA petitions, including the tribally led and co-led petitions (see OPC news release, dated March 20, 2026). OPC indicated that it plans to provide more detailed input on the bin 2 petitions using a policy lens intended to complement the Department's evaluations. OPC now anticipates transmitting its evaluation for consideration at the June 2026 Commission meeting.

Today's Meeting

Today, the petitioner(s) will present Petition 2023-29MPA_AM1. This meeting provides petitioners with an opportunity to engage in dialogue with the Commission alongside robust public participation.

All participants are encouraged to review the Regional Meeting Expectations and Guidelines (included in the agenda) as a reference for engaging in today's meeting.

Significant Public Comments

1. The Barbareño Band of Chumash Indians supports the petition, citing the cultural significance of the proposed Mishopshno SMCA area. The commenters note that the ancestral Chumash village mišopšno was located within the proposed boundaries and that the area holds enduring cultural value to the Chumash people. They state that a tribally co-managed MPA would support greater Chumash community involvement in stewarding an area that supported their ancestors for thousands of years. (Exhibit 3)
2. A Carlsbad resident supports establishing the Mishopshno SMCA and supports co-management with SYBCI, noting anticipated benefits for biodiverse habitats and strengthened Indigenous marine stewardship (Exhibit 4).

   A Carpinteria resident shares their position on all tribally led or co-led petitions scheduled for discussion at the May 5-6, 2026 meeting. Regarding SYBCI-led petitions, the commenter poses questions about the need for additional SYBCI-specific MPAs, considering the original Marine Life Protection Act process to have been inclusive, and asks whether cultural access, public access, regulatory flexibility, and the role of traditional knowledge could be addressed within existing frameworks rather than through new, group-specific protected areas. For Petition 2023-29MPA, the commenter highlights the importance of continued local community access to the Carpinteria Reef for recreational angling and diving. (Exhibit 5)
3. Two marine scientists from the University of California Santa Barbara support the petition, asserting the Mishopshno SMCA would help advance California's tribal marine stewardship goals and increase overall MPA network connectivity. The commenters also describe the overall benefits that MPAs provide more broadly pointing to ecosystem benefits, spillover for fisheries, ecosystem resilience for environmental perturbations such as marine heatwaves, and providing benefits to the local eco-tourism and recreation industries. (Exhibit 6)
4. A Santa Barbara resident supports the petition, stating that the Mishopshno SMCA would protect essential habitats, especially kelp forests, and that the designation would

enhance tribal stewardship in the area as well as protect important present-day and historical sites for the Chumash people (Exhibit 7).

5. The Ventura County Commercial Fishermen's Association cites several concerns regarding the petition for the Commission to consider, including the lack of comprehensive socioeconomic analysis and the absence of a meaningful evaluation of fishing effort displacement and its impact on surrounding open fishing areas. They emphasize that closures may appear to have a small impact, but the closures displace fishing effort because locations like Carpinteria Reef are critical to fishing access and fishers' operational range (Exhibit 8).
6. A recreational angler and diver from northern California who frequently recreates along the central coast shares their position on all petitions scheduled for discussion at the May 5-6, 2026 meeting. The commenter urges the Commission to deny Petition 2023-29MPA_AM1, citing the importance of near-shore access for divers and small-craft anglers. They also express uncertainty about SYBCI's request and the cultural activities that would be supported under the proposed MPA, while acknowledging the importance of protecting the ancestral Chumash village. The commenter recommends considering restrictions focused on prohibiting destructive bottom-contact gear or anchoring rather than limiting lower-impact gear types. (Exhibit 9)
7. A representative of a sport fishing association submits a reference map depicting the proposed SMCA area and its overlap with two reefs — Horseshoe Reef and Horseshoe Kelp — which the commenter identifies as the most important fishing areas for kelp bass and sand bass between Santa Barbara and Ventura harbors (Exhibit 10).
8. A coalition of 41 nongovernmental organizations — including tribal, cultural, environmental, shore fishing-access, conservation, and other groups — submits a joint letter in support of the petition. The coalition states that the proposed Mishopshno SMCA would advance California's tribal marine stewardship goals by supporting tribal co-management and enabling adaptive management. The letter also highlights expected contributions to overall MPA network connectivity, increased access to MPAs for local residents and visitors, added habitat replication within the south coast region, and creation of a conservation corridor for coastal species (Exhibit 11).

Exhibits

1. Petition 2023-29MPA_AM1, received March 26, 2025
2. Corrected petition narrative and boundary for Petition 2023-29MPA_AM1, received October 2025
3. Packet of comments received November 2023 through April 2026
4. Letter from Eleanor Fishburn, Chairperson, Barbareño Band of Chumash Indians, received March 24, 2026
5. Email from Valentina Scaife, received April 16, 2026
6. Email from Kathy Mayer, received April 18, 2026
7. Letter from Dr. Douglas McCauley, Director, and Molly Morse, Senior Manager, Benioff Ocean Science Laboratory University of California Santa Barbara, received April 20, 2026

8. Email from Bill Woodbridge, received April 21, 2026
9. Letter from David Colker, Executive Director, Ventura County Commercial Fishermen's Association, received April 21, 2026
10. Email from Rick Duenas, received April 22, 2026
11. Email from Merit McCrea, Fisheries Science Coordinator, Sportfishing Association of California, received April 22, 2026
12. Joint letter from 41 nongovernmental organizations (tribal, cultural, environmental, fishing access and conservation), received April 22, 2026

Motion (N/A)

Staff Summary for May 5-6, 2026

4. Marine Protected Area (MPA) Petition 2023-19MPA (*Tribally Led*)

Today's Item **Information ☒** **Action ☐**

Receive a presentation from the petitioner, followed by public comment and discussion for Petition 2023-19MPA (Tribally Led): Request to designate a new MPA near Morro Bay as "Chitqawi SMCA" that only includes a tribal take exemption for the Santa Ynez Band of Chumash Indians.

Summary of Previous/Future Actions

• Received 20 MPA petitions; referred to MRC and the Department for review	December 2023; February 2024
• Granted or denied all individual actions in the 5 "bin 1" MPA petitions	December 2024
• Tribal Committee (TC) received overview from tribal leads or co-leads of 5 MPA petitions; received Department presentation, and developed TC recommendation	April 14, 2026; TC
• Received Department bin 2 petition evaluations for 10 non-tribally led or co-led petitions; adopted TC recommendation for tribally led and co-led petitions	April 15-16, 2026
• Received petitioners' presentations and discussed region-specific petitioned actions in bin 2 MPA petitions, from Del Norte through Monterey counties	April 21, 2026
• **Today, receive petitioners' presentation and discuss region-specific petitioned actions in bin 2 MPA petitions, from San Luis Obispo through Santa Barbara counties, northern Channel Islands, and Santa Barbara Island**	**May 5-6, 2026**
• Receive petitioners' presentation and discuss region-specific petitioned actions in bin 2 MPA petitions, from Los Angeles through San Diego Counties and Catalina Island	May 19, 2026
• Receive Department bin 2 evaluations for 5 tribally led or co-led petitions	Date to be determined

Background

In November 2023, the Commission received Petition 2023-19MPA (Exhibit 1), alongside 19 other petitions proposing changes to the state's MPA network and management program. In February 2024, the Commission referred all MPA petitions to the Department for its evaluation and recommendation, while developing and updating guidance over time.

For detailed background information and key documents related to the process leading to this stage—including the companion document to the Department's evaluations for non-tribally led or co-led petitions, the Department's evaluations presentation, and a letter from the California Ocean Protection Council providing input to complement the Department's evaluations—see the *Introduction to Bin 2 MPA Petitions staff summary and exhibits*.

Petition Amendments

Bin 2 petitioners were provided until March 2025 to submit formal amendments to their original petitions for inclusion in the Department's evaluation. The petitioners for this petition did not submit an amendment by the March 2025 deadline.

However, in August 2025, the Commission extended time for California tribes to formally join petitions as co-sponsors and to allow tribes to contribute additional modifications as needed to their petitions. The Commission also referred all tribally led or co-led petitions to TC for review prior to Commission review.

Note that this petition was clarified and revised through the TC petitions review.

TC Petitions Review

At the April 14, 2026 TC meeting, tribal petitioners provided verbal and/or PowerPoint summaries and clarifications of their petition proposals. For a Zoom-recorded video of the meeting, see Tribal Committee Meeting - April 14, 2026 - via YouTube.

Through the discussions, it became clear that the intended actions for three of the five tribally led or co-led petitions differed from their previous submissions. This tribally led petition was one of the three that were modified during TC review of the tribal petitions.

For Petition 2023-19MPA, the tribal petitioner provided a verbal overview of the proposed MPA and clarified their intended actions relative to the original November 2023 petition. They explained that although the original petition included three types of take in the proposed SMCA, their current intent is solely to include a tribal take exemption for the Santa Ynez Band of Chumash Indians (SYBCI). TC supported accepting this clarification.

At its April 15–16, 2026 meeting, the Commission approved TC's recommendation to accept the clarified intents for the tribally led and co-led petitions, based on the information shared by tribal leads and co-leads at the April 14 TC meeting. The Commission also requested that the Department proceed with evaluating the five tribally led or co-led petitions, incorporating the clarifications and revisions shared at the TC meeting.

Overview of Actions in Petition 2023-19MPA Relevant to This Region

This petition, submitted by SYBCI, proposes to designate a new MPA within this region near Morro Bay. The action describe below includes revisions (in strike-out format) reflecting the petitioner's clarification at the April 14, 2026 TC meeting, which the Commission accepted at its April 15-16, 2026 meeting.

Action 1. Establish a new SMCA as "Chitqawi SMCA" that prohibits all take except ~~(1) recreational take of finfish, and of invertebrates except rock scallops and mussels by hand; (2) take pursuant to activities authorized under 632(b)(97)(C); and (3) add~~ a tribal take exemption for SYBCI.

The petitioner also requests to establish a co-management agreement between SYBCI and the Department (*note that this does not require a regulatory change*).

Stated Intent

In summary, the petitioners state that their proposal is intended to: (1) establish "a new MPA between Morro Bay and Cambria" that would provide an "…additional California co-management SMCA as 'Chitqawi' – the northern most coastal village site of the territory traditionally inhabited by the diverse Chumash peoples"; (2) "ensure the designed benefits of marine reserves as an insurance factor … needed to protect marine life and habitat from the synergistic impacts of anthropogenic disturbance events" and to "contribute to California's 30x30 goals to ensure 30% of California waters are fully protected by 2030;" and (3) "strengthen the role of tribes in co-management and monitoring efforts and marine education activities through the marine region" because "there is no Tribal MPA for co-management within this regional network."

Petitioners clarified at the April 14, 2026 TC meeting that their petition would designate a new co-management SMCA in Morro Bay named "Chitqawi" SMCA and, based on their stated intent, they only request a tribal take exemption for SYBCI.

Public Comments

The Commission has received public comments on MPA petitions continuously since petitions were submitted in late 2023. Staff has compiled into a single packet the comments received for this petition that were included in committee or Commission meeting binders or supplemental handouts from the December 2023 through April 2026 Commission meetings (Exhibit 2). Comments received after the April 2026 Commission meeting but before the deadline for this meeting are included as exhibits to this staff summary.

Petition Evaluations

On March 20, 2026, the Department publicly released its evaluations and recommendations for the ten petitions that were not tribally led or co-led. Evaluations for the five tribally led or co-led petitions, including the petition addressed in this item, have not yet been completed. The Commission supported the Department's decision to defer evaluation of tribally-led or co-led petitions to allow time government-to-government consultation with tribes and for the TC to review and discuss those petitions at its April 14, 2026 meeting.

In addition, on March 20, 2026 the California Ocean Protection Council (OPC), in its role as policy lead for the MPA network, sent a letter to the Commission outlining its overarching perspectives on the MPA petitions, including the tribally led and co-led petitions (see OPC news release, dated March 20, 2026). OPC indicated that it plans to provide more detailed input on the bin 2 petitions using a policy lens intended to complement the Department's evaluations. OPC now anticipates transmitting its evaluation for consideration at the June 2026 Commission meeting.

Today's Meeting

Today, the petitioner(s) will present Petition 2023-19MPA, including clarifications approved after the April 14 TC meeting. This meeting provides petitioners with an opportunity to engage in dialogue with the Commission alongside robust public participation.

All participants are encouraged to review the Regional Meeting Expectations and Guidelines (included in the agenda) as a reference for engaging in today's meeting.

Significant Public Comments

1. The Ventura County Commercial Fishermen's Association (VCCFA) cites several concerns about the petition, including the lack of comprehensive socioeconomic analysis and the absence of a meaningful evaluation of fishing effort displacement and its impact on surrounding open fishing areas. VCCFA emphasizes that fishing closures displace fishing effort and increase socioeconomic consequences by moving fishing effort to Morro Bay, Cambria, Point Buchon (and surrounding waters), and other open access areas along the central coast region. They urge the Commission to require socioeconomic, effort displacement, cumulative impact, and economic impact analyses before proceeding. (Exhibit 3)
2. A recreational angler and diver from northern California who frequently recreates along the central California coast urges the Commission to accept the petition if it would allow for recreational finfish take (as originally proposed) but urges the Commission to also allow commercial take with low-impact gear, especially for market squid, within the proposed Chitqawi SMCA boundaries (Exhibit 4).

Recommendation

Commission staff: Based on the day's discussion, consider what additional information, if any, will be needed to inform a Commission decision on the petition.

Department: Currently under development.

Exhibits

1. Petition 2023-19MPA, received November 29, 2023 *(this is the original version and does not reflect changes requested by the petitioner on April 14, 2026 and approved for inclusion by the Commission at its April 15-16, 2026 meeting)*
2. Packet of comments, received November 2023 through April 17, 2026
3. Letter from David Colker, Executive Director, Ventura County Commercial Fishermen's Association, received April 21, 2026
4. Email from Rick Duenas, received April 22, 2026

Motion (N/A)

From: Rick Duenas <[redacted]>
Sent: Wednesday, April 22, 2026 09:56 AM
To: FGC <FGC@fgc.ca.gov>
Subject: Public comment: May 5-6, 2026: Central Region Petitions

Dear President Sklar and Members of the Commission,

My name is Rick Duenas and I am a recreational angler and diver in Northern California who often recreates on the central coast. I am writing regarding the MPA petitions for San Luis Obispo through Santa Barbara County including the Northern Channel Islands. I urge you to deny most of these petitions or encourage petitioners to carve out recreational access as noted below.

2023-28: **Deny**. The remoteness and aspect of this location serve as refuge as it is fishable only in calmer weather patterns already. Also, this location is already inside the Chumash Heritage National Marine Sanctuary and therefore already counted in 30x30. I would prefer that any new MPAs contribute to increasing the 30x30 percentage.

2023-29: **Deny or revise.** This area provides important near-shore access for divers and small-craft anglers. I would like to see spearfishing, spiny lobster, and boat-based hook-and-line finfish take allowance. From the Tribal Committee Meeting, it was not clear to me what cultural activities would be supported by this MPA that are not already allowed. I recognize the importance of protecting submerged ancestral sites, so I would prefer that restrictions be tailored to barring the use of destructive bottom gear or anchoring instead of restricting lower impact gear types.

2023-19: **Accept with revision**. I appreciate that the petitioner allowed for the take of finfish as the location is one of the better areas for salmon and halibut trolling in the region. However, this area is also important to the commercial sector, particularly for market squid, so I would like to see commercial access with low impact gear preserved as well.

2023-20: **Accept** as clarified in Tribal Committee Meeting. I appreciate the petitioner not changing general public fishing access to salmon and albacore while allowing for tribal take and co-management.

2023-34: **Deny**. I support CDFW's recommendation. I appreciate allowance for low impact pelagic take wherever possible.

2023-33: **Deny.** I support CDFW's recommendation. The proposed actions would severely limit in-shore recreation access.

2023-18: **Deny**. I support CDFW's recommendation. I appreciate opportunities for more access but I am okay with the status quo and do not wish to trade access elsewhere in the network in order to balance this change.

2023-27: **Deny**. I dive Anacapa every fall and the amended 0-30m proposal seemed like one of the more reasonable and targeted petitions but I support CDFW's recommendation.

2023-14: **Deny**. I support CDFW's recommendation. I believe that these reserves should serve as control treatment groups relative to urchin barren mitigation being done outside of reserves.

2023-15: **Deny**. I support CDFW's recommendation. I appreciate opportunities for more access but I am okay with the status quo and do not wish to trade access elsewhere in the network in order to balance this change.

In short, please consider denying or requesting revision to the vast majority of the central region bin-2 petitions. Thank you for your time.

Sincerely,

Rick Duenas

November 24, 2025

Erika Zavaleta, President
California Fish and Game Commission
715 P Street, 16th Floor
Sacramento, CA 95817

Submitted electronically to fgc@fgc.ca.gov

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

Dear President Zavaleta and Honorable Commissioners:

We are writing on behalf of the Northern Chumash Tribal Council (NCTC) and Natural Resources Defense Council (NRDC) with a request to amend Petition 2023-28MPA, which seeks to designate a new marine protected area (MPA) off the coast of Point Sal and within state waters of the Chumash Heritage National Marine Sanctuary.

As per the email dated Monday, October 13, NCTC will join NRDC as a formal co-sponsor of this petition. Point Sal is located in Chumash ancestral territory, and holds historic and cultural significance to Chumash people. It also lies within the Chumash Heritage National Marine Sanctuary, a recently designated federal marine protected area proposed and championed by NCTC. As part of NCTC's ongoing leadership in Chumash stewardship of California's marine resources, we are committed to garnering strong protections for the sacred and culturally important waters of Point Sal. If designated, this petition would advance progress toward Recommendations 2a, b, and c of the California MPA Decadal Management Review, and advance Tribal co-stewardship and MPA management through a collaborative co-stewardship approach with NCTC. We respectfully request that Petition 2023-28MPA be reclassified as a Tribal petition because of this change in co-sponsorship. Further, we support the option to rename the Point Sal State Marine Conservation Area with a Chumash place name after further consultation with other Chumash Tribes in the region, as stated in the original petition.

Following months of productive conversations, we are adjusting the southern boundary of the proposed MPA roughly one mile to the north to avoid conflicts with existing mission-critical operations of Vandenberg Space Force Base (VSFB). Initially, the proposed boundaries were drawn to align with visible landmarks and natural geographies as much as possible, with the northern boundary beginning at Mussel Point and the southern boundary drawn at the end of Brown's Beach – two visual landmarks that are likely visible from sea, per MLPA Master Plan guidance.

Since the petition's submission in fall 2023, conversations with officials at VSFB have improved our understanding of the base's operations and facilities, and we learned that the southernmost offshore boundary of the SMCA (as originally proposed) overlaps with critical VSFB assets. The new southern boundary as amended herein is the result of productive conversations and negotiations with VSFB. We believe it is sufficiently protective of critical conservation features in the proposed MPA such as Lion's Rock, persistent kelp forest habitat, biologically important areas for cetaceans and porpoises, and the larval retention zone on the leeward side of Point Sal. Critically, the proposed MPA as amended still meets minimum size and shoreline extent guidelines, and the new southern boundary generally aligns with the southern end of Point Sal State Beach, making it easily recognizable and understandable for the public.

We recognize that these are two significant changes during the review process. We appreciate your understanding that building authentic partnerships and conducting thorough outreach with critical stakeholders takes time. Please let us know if you have any questions or would like to schedule a meeting to discuss this addition in sponsorship or changes in boundaries.

Thank you for your consideration.

Sincerely,

Violet Sage Walker
Chairwoman
Northern Chumash Tribal Council

Sandy Aylesworth
Director, Pacific Initiative, Nature
Natural Resources Defense Council

Tracking Number: (2023-28MPA_AM2)

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: Lisa Suatoni, National Resources Defense Council
   Address: 111 Sutter St 21st floor, San Francisco, CA 94104
   Telephone number: (415) 875-6100
   Email address: lsuatoni@nrdc.org

2. **Rulemaking Authority (Required) -** Authority cited: Sections 200, 205(c), 265, 399, 1590, 1591, 2860, 2861 and 6750, Fish and Game Code; and Sections 36725(a) and 36725(e), Public Resources Code.

3. **Overview (Required) -** We propose the designation of a new State Marine Conservation Area (SMCA) in the waters around Point Sal, Central California to 1) advance Tribal co-stewardship and MPA management through a collaborative co-stewardship approach with the Northern Chumash Tribal Council, 2) protect the rich and productive ecosystem and biodiversity found within, 3~~2~~) protect an important larval retention zone and enhance the connectivity dynamics within the region, and 4~~3~~) enhance the climate resilience of the broader state MPA network.

   The proposed area aligns with state MPA design and feasibility guidelines provided by CDFW, and is bounded by the mean high tide line, the 3 nm state waters boundary, and straight lines connecting the following points in the order listed:
   - 34.89521266~~534.880667518~~ N lat. 120.731972573 ~~120.726433061~~ W long. (SW corner)
   - 34.929894739 N lat. 120.727488272 W long. (NW corner)
   - 34.930008197 N lat. 120.666597401 W long. (NE corner)
   - 34.895212665 ~~34.880979714~~ N lat. 120.642637239 ~~120.639473286~~ W long. (SE corner)

The proposed SMCA would prohibit the injury, damage, take, or possession of all living, geological, or cultural marine resources with the exception of incidental take related to mission-critical military operations of the adjacent Vandenberg Space Force Base and recreational take of finfish from shore using hook and line. This permitted activity would allow for fishing access to the shoreline and marine resources for recreational, traditional, ceremonial, cultural, and subsistence purposes for the public including the Chumash people and other members of federally and non-federally recognized tribes.

We recommend that the state consult with local Indigenous communities and Tribes to explore co-management options for the Point Sal SMCA before designation.

4. **Rationale (Required) -** Located in Santa Barbara County in Chumash ancestral territory, Point Sal is an ecologically rich and relatively remote promontory along the coastline that supports a diverse marine ecosystem and provides critical habitat for seabirds and marine mammals alike. The nutrient-rich waters found at this site allow for a diversity of ocean life to thrive, with kelp beds, rich tidepools, and productive waters that support humpback whales, gray whales, a variety of sea lions and seals, sea otters, and a biologically important feeding area for endangered blue whales nearby. Offshore, Lion Rock is a significant roosting site for seabirds like the Brown pelican and Brandt's cormorant and acts as a relatively undisturbed haulout for sea lions, seals, and other pinnipeds, underlining the area's conservation value for these animals as the California coastline becomes increasingly developed. In addition, the leeward waters of Point Sal act as a larval retention zone. Larval retention zones are known to be highly beneficial areas for the recruitment of fish and invertebrate larvae in wind-driven upwelling zones while promoting the biodiversity of the surrounding ecosystem. Point Sal also holds cultural significance for the Chumash people, with evidence of their occupation as recently as 250 years ago and as far back as 4,800 years ago; Chumash artifacts are visible throughout Point Sal, and analyses of burial sites from the area demonstrate the rich cultural ties to the traditional stewards of this land. Furthermore, Point Sal is still of importance to the Chumash people who visit and use the area today. Protecting the marine waters and coastal resources of Point Sal would help to recognize its value as a cultural heritage site that still contributes to the identity, sense of place, and cultural and subsistence practices for many of the Indigenous people of Central California today. Cosponsored by the Northern Chumash Tribal Council, the Point Sal SMCA seeks to advance Tribal co-stewardship and management of a California MPA, in alignment with the recommendations identified after the MPA network Decadal Management Review (Recommendations 1, 2, and 3). We request that upon designation of this SMCA, CDFW work to formalize an official collaborative co-stewardship agreement with NCTC and other interested Tribes.

Protecting the waters of Point Sal aligns strongly with the goals set by the California Marine Life Protection Act (MLPA), especially with regards to the protection of natural biodiversity found in relatively undisturbed marine ecosystems and advancement of Tribal marine stewardship. Given the remote nature of Point Sal, its relative lack of human disturbance, and potential for increased threats to the California MPAs found nearby, there is value in maximizing the ecological and biological benefits that Point Sal provides to the marine species that inhabit the area and to the broader Central California region. As development of the state's coastline and seascape progresses, protecting relatively undisturbed areas will add to

the resilience of the MPA network by providing refugia for marine life from encroaching threats. Furthermore, designating a Tribal~~n~~ MPA in the proposed area will improve recreational, educational, and study opportunities at Point Sal and support equitable access to coastal resources moving forward into the future.

See Petition Narrative for full rationale.

SECTION II: Optional Information

5. Date of Petition: 11/30/2023

6. Category of Proposed Change
☐ Sport Fishing
☐ Commercial Fishing
☐ Hunting
☒ Other, please specify: MPAs, Section 632.

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):Westlaw regulations.
☐ 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
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:
a. Proposed Point Sal SMR petition narrative
b. Figure 1 - Proposed Point Sal SMR habitat map
c. Appendix A - Climate-smart MPA design guidelines met by proposed Point Sal SMR
d. Appendix B - Proposed Point Sal SMR letter of support

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:

Current fishing in the proposed area is limited, likely due to its considerable distance from the nearest port areas of Morro Bay and Santa Barbara. The proposed Point Sal MPA overlaps with 14% of California fishing block 631, and 11% of California fishing block 632. According to the Marine Fisheries Data Explorer, annual landings reported from these blocks over a 10-year period from 2012 to 2022 were an average of 231,460 lbs by weight and $678,632 by value

per year. This represents just 0.11% of the landings by weight, and 1.1% of landings by value, reported for the Central Coast region over the same 10-year period. For this reason, and due to the relatively small proposed size of the MPA, we believe the establishment of an SMR in this area would have minimal economic impact to commercial fisheries.

Our request to CDFW for recreational fishing data from this area was being processed at time of submission; we will evaluate the potential impact to recreational fishers and submit it to the state following receipt of the requested data.

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

SECTION 3: FGC Staff Only

Date received: ~~Click here to enter text.~~11/24/2025

FGC staff action:

- ~~☐~~ X Accept - complete
- ☐ Reject - incomplete
- ☐ Reject - outside scope of FGC authority

~~Tracking Number~~

Date petitioner was notified of receipt of petition and pending action: 11/26/2025

Meeting date for FGC consideration: Receive and Re-refer on 12/11/2025

FGC action:

- ☐ Denied by FGC
- ☐ Denied - same as petition _____
  Tracking Number
- ☐ Granted for consideration of regulation change

Petition to Designate a New State Marine Reserve at Point Sal, Central California
PETITION NARRATIVE

Point Sal is located in Santa Barbara County, California, roughly 50 miles (80 kilometers) to the northwest of Point Conception. The nearest city to Point Sal is Guadalupe, located about six miles to the northeast, and Vandenberg Space Force Base is located to the south. Known for its scenic beauty, rugged cliffs, and stunning ocean views, Point Sal is a relatively remote and undeveloped area along California's coastline located in Chumash ancestral territory. Its waters are home to rich biodiversity, productive oceanographic features, and intact food webs that are worth protecting. This petition calls for the designation of a new State Marine Conservation Area with a Chumash collaborative co-stewardship approach with the Northern Chumash Tribal Council (NCTC) and other interested Tribes.~~allowing for cultural and subsistence use by Tribes and Indigenous communities in this area,~~ This MPA would~~to~~ advance the goals of California's network of marine protected areas (MPAs) in the face of climate change and threats from increased human activities and threats in the future, and advance California's priorities of recognizing and remedying the displacement of Indigenous nations from California's coasts and lands. The Point Sal SMCA would allow for cultural and subsistence use by Tribes and Indigenous communities in this area and the continuation of recreational hook and line fishing from shore.

Goals

The overall goals of this new MPA are to 1) advance Tribal co-stewardship and MPA management (DMR Recommendation 2a, b, and c) through a collaborative co-stewardship approach with the Northern Chumash Tribal Council, 2~~1~~) protect this rich and productive ecosystem and the biodiversity found within, 3~~2~~) to protect this larval retention zone and the connectivity dynamics within the region, and 4~~3~~) to enhance the climate resilience of the broader state MPA network.

Proposed boundaries

In keeping with state MPA design and feasibility guidelines provided by CDFW, the proposed area is bounded by the mean high tide line and straight lines connecting the following points in the order listed:

a. 34.895212665 ~~34.880667518~~ N lat. 120.731972573 ~~120.726433061~~ W long. (SW corner)
b. 34.929894739 N lat. 120.727488272 W long (NW corner)
c. 34.930008197 N lat. 120.666597401 W long. (NE corner)
d. 34.895212665 ~~34.880979714~~ N lat. 120.642637239 ~~120.639473286~~ W long. (SE corner)

The proposed boundaries were drawn to align with visible landmarks and natural geographies as much as possible, with the northern boundary beginning at Mussel Point, and the southern boundary aligned with the end of a Vandenberg Space Force Base road~~drawn at the end of~~

~~Brown's Beach~~. The eastern boundary aligns with the mean high tide line, and the western boundary extends out to the edge of state waters as recommended by state feasibility guidelines.

The proposed area is 9.18 ~~14.22~~ square miles with an alongshore span of 4.03 ~~3.2~~ miles, which meets the state's minimum size guidelines and design recommendations. The proposed area is located 19 miles alongshore from Point Buchon SMR/SMCA, the nearest MPA to the north, which meets the state's minimum spacing recommendations, and 6.5 miles from Vandenberg SMR, the nearest MPA to the south.

Proposed regulations

- Any injury, damage, take, or possession of all living, geological, or cultural marine resources is prohibited, with the exception of recreational take of finfish from shore using hook and line.
- Take incidental to base operations and commercial space launch operations identified by the Vandenberg Space Force Base Commander as mission critical is allowed.
- Public entry may be restricted at the discretion of the California Department of Fish and Wildlife (Department) to protect wildlife, aquatic life, or habitat, or by the Commander of Vandenberg Space Force Base to protect and provide safety for base operations.
- The Department shall enter into a Memorandum of Understanding (MOU) with the Commander of Vandenberg Space Force Base for the mutually beneficial management and administration of the Point Sal State Marine Conservation Area. The MOU shall include, but not be limited to, the identification of Vandenberg Space Force Base's national defense mission activities that are unrestricted by the subject regulations and details on management and administrative roles and responsibilities.

Ecological significance of the area

The coastal waters around Point Sal in California support a diverse and dynamic marine ecosystem. The rocky coast is home to abundant and rich tidepools. The kelp beds found in waters leeward of the point provide habitat for endangered Southern sea otters and many other kelp-associated species. The rocks and coastal habitats around the point provide critical roosting and foraging habitats for multiple species of seabirds. State waters surrounding the point are home to a variety of feeding and migrating marine mammals, including bottlenose and common dolphins, harbor porpoises, humpback and gray whales, California sea lions, harbor seals, elephant seals, and Steller sea lions.[1]

An analysis of species, habitats, threats, and existing protections within the California Current found that the waters around Point Sal are among the top 5% in conservation value in the

[1] Condor Environmental Planning Services, "Point Sal Reserve Revised Management Plan" (Santa Barbara County Parks Department, July 2002), https://ryono.net/pointsal/ptsalreserve.pdf.

California Current.[2] Notably, the area remained within the top 5% regardless of whether conservation value was being measured utilizing the species richness index or the rarity index, with a significant portion of these areas falling into the top 2%. This region of California is also well-known as a marine biogeographic 'transitional zone' for ocean and coastal biota. Many species reach the southern or northern limits of their ranges here, making it an important biogeographic boundary along California's coast.[3]

The nutrient-rich waters in this region support a productive food web. Upwelling, where nutrient-rich deep waters rise to the surface, enhances primary productivity, providing ample food resources for a variety of marine organisms, from plankton to larger predators. A krill hotspot[4] and Biologically Important Area (BIA) for blue whale foraging are located just outside the proposed area,[5] indicating that these waters are productive enough to support feeding blue whales, which ingest up to 16 tons of krill per day.[6] The state waters within the proposed area are home to several other BIAs for marine mammal species, including a BIA for humpback whale foraging, a BIA for migrating gray whales, and BIA for resident harbor porpoises.[7]

Lion Rock haul out and roosting site

Lion Rock, located off the southern coast of Point Sal, is an important haul out site for sea lions and other marine mammals. As many as 883 sea lions have been observed on the rock on a single day, and the site is also occasionally used by Steller sea lions and elephant seals.[8] Haulouts are critical to the behavioral cycles of foraging, resting, and breeding for pinnipeds. However, these species are highly sensitive to visual and auditory disturbance and will leave haulouts when they become stressed – even abandoning them permanently, if disturbances occur frequently. Undisturbed haulouts are thus necessary for the protection of these species. Given Point Sal's remote location, Lion Rock currently experiences little to no human-caused disturbance[9] and may be one of the few remaining undisturbed haulouts along the busy California coastline – making it especially important for the conservation of these marine mammals.

Commented [A1]: discrepancy in spelling from "haul out". are these supposed to be different?

[2] Nathan Elliott et al., "Assessment of Marine Protected Areas in the California Current" (Petaluma, CA: Point Blue, June 5, 2020), https://www.pointblue.org/wp-content/uploads/2020/09/MPA-Assessment_Final.pdf.
[3] Ronald S. Burton, "Intraspecific Phylogeography Across the Point Conception Biogeographic Boundary," *Evolution* 52, no. 3 (June 1998): 734–45, https://doi.org/10.1111/j.1558-5646.1998.tb03698.x.
[4] Jarrod A. Santora et al., "Mesoscale structure and oceanographic determinants of krill hotspots in the California Current: Implications for trophic transfer and conservation," *Progress in Oceanography* 91, no. 4 (December 2011): 397-409, https://doi.org/10.1016/j.pocean.2011.04.002
[5] National Oceanic and Atmospheric Administration, "Biologically Important Area Map," Web map, Cetacean & Sound Mapping, accessed November 20, 2023, https://cetsound.noaa.gov/biologically-important-area-map.
[6] Matthew S. Savoca et al., "Baleen Whale Prey Consumption Based on High-Resolution Foraging Measurements," *Nature* 599, no. 7883 (November 2021): 85–90, https://doi.org/10.1038/s41586-021-03991-5.
[7] NOAA, "Biologically Important Area Map."
[8] NMFS, NOAA, and Department of Commerce. Takes of Marine Mammals Incidental to Specified Activities; Taking Marine Mammals Incidental to Weapons Testing at Vandenberg Air Force Base; California. 87 FR 762 (Jan. 6, 2022). Available at https://www.federalregister.gov/documents/2022/01/06/2022-00032/takes-of-marine-mammals-incidental-to-specified-activities-taking-marine-mammals-incidental-to.
[9] Dan Robinette, Sara Acosta, and Julie Howar, "Year 1 Results of Baseline Monitoring Within the Point Sur to Point Mugu Study Area of the Seabird Protection Network" (Petaluma, CA: PRBO Conservation Science, November 15, 2012).

Lion Rock is also an important roosting site and breeding site for many seabird species. Roosting is a vital behavior for seabirds, providing essential rest, social interaction, protection, and nesting opportunities, thereby enhancing their energy conservation, reproductive success, and overall well-being in the dynamic marine environment. Seabirds like cormorants do not have oil-producing glands to help their feathers repel water, making roosting especially critical for these species to dry after foraging. Thousands of cormorants have been observed roosting on Lion Rock,[10] and it is also a roost site of significant importance for Brown Pelicans, which until recently were listed as endangered species.[11] Finally, Lion Rock is a breeding site of growing importance for Brandt's cormorants, with as many as 14 breeding pairs observed on the rock in recent years.[12]

Connectivity and larval retention zone

Although wind-driven upwelling is a vital source of nutrients for California ecosystems, this large-scale offshore transport of coastal ocean water poses a significant challenge to larval stages of marine organisms that must recruit to coastal environments. Headlands, such as found at Point Sal, can help to mitigate this effect by slowing down or recirculating ocean currents, and research has shown waters on the leeward sides of coastal promontories or headlands provide refuge for fish and invertebrate larvae against offshore transport during upwelling events.[13] These "larval retention zones" are critical for enhanced recruitment, and help to ensure that adult populations are supplied with larvae in recruitment-limited upwelling regions.[14] Larval retention zones also serve as biological hotspots, where upwelling delivers nutrients that then fuel phytoplankton growth and support marine food webs. This effect has been shown even for small headlands like Point Sal (e.g., Bodega Headland).[15]

Point Sal's leeward waters are known to serve as a larval retention zone in this stretch of the Central Coast. One study used seabird foraging rates as a proxy for juvenile fish recruitment to explore whether seabird foraging and geographic indicators can be used to identify larval retention zones, in order to help inform MPA network spatial design.[16] The findings show that both long and short headlands—including Point Sal—lead to higher juvenile fish abundance, and that coastal orientation was an important determinant of juvenile fish abundance. Pelagic cormorant foraging rates were also found to be higher at south-facing coasts like Point Sal's compared to other coastal orientations. This is due to weaker offshore advection caused by

[10] Condor Environmental Planning Services, "Point Sal Reserve Revised Management Plan."
[11] Dan Robinette and Julie Lanser, "Brown Pelican Roost Utilization Along the Coastal Margin of Vandenberg Air Force Base, 2004" (Stinson Beach, CA: PRBO Conservation Science, May 3, 2006).
[12] Robinette, Acosta, and Howar, "Year 1 Results of Baseline Monitoring Within the Point Sur to Point Mugu Study Area of the Seabird Protection Network."
[13] Amber J. Mace and Steven G. Morgan, "Larval Accumulation in the Lee of a Small Headland: Implications for the Design of Marine Reserves," *Marine Ecology Progress Series* 318 (August 3, 2006): 19–29, https://doi.org/10.3354/meps318019.
[14] Ibid.
[15] Ibid.
[16] Dan Robinette, Nadav Nur, and Jaime Jahncke, "Spatial Patterns in Nearshore Juvenile Fish Abundance Throughout the California Network of Marine Protected Areas as Revealed by Seabird Foraging Rates," *California Cooperative Oceanic Fisheries Investigations* 60 (2019).

coastal upwelling along south-facing coasts, and eddies forming in the lee of the south-facing coasts of embayments.[17]

This biological evidence for local retention zones is supported by physical oceanography data. Multiple studies of oceanographic currents in the area show that within the Santa Barbara Channel, ocean currents primarily run from east to west.[18] Just north of Point Conception there is strong seasonal equatorward flow heading south. Around the area of Point Sal, the interaction of these westward and southward surface currents cause convergence.[19] Additionally, the region experiences episodic periods of wind relaxation in the spring, leading to less vigorous upwelling with important biological consequences for larval retention and surface productivity.[20]

Chumash Heritage and collaborative co-stewardship~~Historical and cultural use~~

The ocean is an integral part of Chumash culture and heritage and Point Sal holds significant cultural and historical ties to the Chumash people, who have inhabited the region for thousands of years.[21] For instance, the Chumash village Axwin was located very close to the area.[22] There is abundant evidence of Chumash occupation of Point Sal as recently as 250 years ago and as far back as 4,800 years ago. Rock rings where homes once stood, grinding stones, and other Chumash artifacts are easily visible. Human remains found at Chumash burial sites indicate that the diet of Indigenous peoples living at Point Sal was high in marine protein. Chumash oral histories and their current marine practices~~,~~ demonstrat~~eing~~ the strong link between coastal peoples and marine resources.[23] There are many Chumash people who still live in the general area and come to Point Sal for a variety of reasons. Protecting the marine waters and coastal resources of Point Sal would help to recognize its value as a cultural heritage site that still contributes to the identity and sense of place, and cultural and subsistence practices for many of the Indigenous people of Central California today.

Cosponsored by the Northern Chumash Tribal Council, the Point Sal SMCA seeks to advance Tribal co-stewardship and management of a California MPA, in alignment with the recommendations identified after the MPA network Decadal Management Review (Recommendations 1, 2, and 3). We request that upon designation of this SMCA, CDFW work

[17] Ibid.
[18] Clinton D. Winant, Edward P. Dever, and Myrl C. Hendershott, "Characteristic Patterns of Shelf Circulation at the Boundary between Central and Southern California," *Journal of Geophysical Research: Oceans* 108, no. C2 (2003), https://doi.org/10.1029/2001JC001302.
[19] Sutara H. Suanda et al., "Wind Relaxation and a Coastal Buoyant Plume North of Pt. Conception, CA: Observations, Simulations, and Scalings," *Journal of Geophysical Research: Oceans* 121, no. 10 (2016): 7455–75, https://doi.org/10.1002/2016JC011919.
[20] Louis W. Botsford et al., "Effects of Variable Winds on Biological Productivity on Continental Shelves in Coastal Upwelling Systems," *Deep Sea Research Part II: Topical Studies in Oceanography*, The Role of Wind-Driven Flow in Shelf Productivity, 53, no. 25 (December 1, 2006): 3116–40, https://doi.org/10.1016/j.dsr2.2006.07.011.
[21] Bureau of Land Management, "Point Sal," Visit Point Sal, accessed November 20, 2023, https://www.blm.gov/visit/point-sal.

[22] King, Chester. *The Names and Locations of Historic Chumash Villages* . The Journal of California Anthropology, 12 Jan. 1975, escholarship.org/uc/item/8833s5k5
[23] Bureau of Land Management, "Point Sal," Visit Point Sal, accessed November 20, 2023, https://www.blm.gov/visit/point-sal.

to formalize an official collaborative co-stewardship agreement with NCTC and other interested tribes that would aim to achieve the following: 1) incorporate Indigenous Knowledge, goals, perspectives, and monitoring into CDFW's management of the MPA (DMR Recommendation 2c), 2) provide for appropriate, substantive involvement of all interested local Indigenous community groups (federally and non-federally recognized local Tribes and Indigenous groups) in the ongoing stewardship of the MPA, 3) provide tribes with meaningful resources to support participation in management of the MPA (DMR Recommendation 3), 4) facilitate and support Tribal and Indigenous community cultural access, connection to, and activities within the MPA (DMR Recommendation 2b).

Habitat

Since the creation of the California MPA network, a new dataset that allows for detailed delineation of the habitat categories used in the design of the MPA network for all California state waters has been completed and made available through the California State Mapping Program (CSMP). Using this dataset, we characterized the habitat types present in the area proposed for protection around Point Sal (Figure 1).[24]

The proposed area is characterized by a large amount of sandy bottom, with some rocky substrate south of the point and in the northeast portion of the area (8.3% shallow (0-30m) rocky bottom, 41.9% shallow sandy bottom, 1.2% deeper (30-100m) rocky bottom, and 48.6% deeper sandy bottom). Kelp beds are present on the shallow rocky bottom substrate (personal communications, Dan Robinette), supporting numerous marine species like rockfish and sea otters.[25]

Adding this area to the California state MPA network would increase the number of replicate sites for these four important habitat types, as recommended by the science-based guidelines for the MLPA planning process and recent peer-reviewed guidelines for the design of climate-smart MPA networks.[26]

Land-sea connection

Coastal marine ecosystems are influenced by both ocean- and land-based activities. Conservation efforts focused on addressing ocean-based threats alone are often compromised by land-based impacts that affect coastal ecosystems, such as nutrient runoff, organic and inorganic pollutants, and the direct impacts associated with high levels of human traffic and visitation.[27] Planning for and designating MPAs that are linked with terrestrial reserves or

[24] California State University, Monterey Bay, Seafloor Mapping Lab. 2014. California Seafloor Mapping Project - Undersea Imagery Archive 2007-2014. https://csumb.edu/undersea/seafloor-maps Accessed 2023.
[25] Condor Environmental Planning Services, "Point Sal Reserve Revised Management Plan."
[26] Nur Arafeh-Dalmau et al., "Integrating Climate Adaptation and Transboundary Management: Guidelines for Designing Climate-Smart Marine Protected Areas," *One Earth* 6, no. 11 (November 17, 2023): 1523–41, https://doi.org/10.1016/j.oneear.2023.10.002.
[27] David M. Stoms et al., "Integrated Coastal Reserve Planning: Making the Land–Sea Connection," *Frontiers in Ecology and the Environment* 3, no. 8 (2005): 429–36, https://doi.org/10.1890/1540-9295(2005)003[0429:ICRPMT]2.0.CO;2.

adjacent to areas with little to no human impact can therefore considerably improve MPA conservation outcomes.[28] The proposed SMCA is adjacent to Point Sal State Beach, which currently protects approximately 80 acres and includes just over 1 1/2 miles of ocean frontage. Due to its remote location, and possibly these terrestrial protections, Point Sal's terrestrial habitats remain relatively undisturbed and free of negative human impacts,[29] making the waters around Point Sal a particularly valuable area to protect.

Access and recreation

The coastline of the proposed SMCA is currently accessible through Point Sal State Beach and Point Sal Trail. Recreational activities at Point Sal State Beach include fishing, beach combing, hiking, nature study, photography, picnicking, and sunbathing.

In 1998, heavy rains destroyed Point Sal Road in several places, which was the main access road for Point Sal State Beach. The road was closed until May 2008, when Air Force and County officials announced they had reached an interim agreement to provide access. They have since been "coordinating to place informational signs, fix fences and repair washed-out sections of the County road", though progress has been extremely slow. The road remains closed, although according to California's State Parks Department, efforts to develop a long-term access plan to Point Sal State Beach are ongoing.[30]

Point Sal State Beach is currently best accessed via Point Sal Trail, which is located at the end of Brown Road. This moderately challenging trail is approximately 10 miles round trip to the beach and back,[31] or 5 miles round trip to a popular coastal bluff overlook and back, and is open year-round. It provides unparalleled access to pristine coastal wilderness, traversing astonishingly beautiful coastal habitats such as dunes, chaparral, windswept bluffs, and rocky cliffs. The trail is described as "a very popular area for hiking",[32] and locally-based environmental groups like the Guadalupe-Nipomo Dunes Center regularly organize group hikes to Point Sal as part of their educational programming for local underserved communities.[33]

By making the ocean more productive and resilient to climate change, stronger marine protections like the proposed Point Sal SMCA can enhance shore-based recreation. When combined with efforts to increase access and connect more people to nature, additional state MPAs can give those from marginalized communities more equitable access to the ocean's resources and benefits. California's MPAs have been shown to increase the biomass of fishery-targeted species and promote "spillover" into nearby coastal areas, benefitting nearby fishing

[28] Arafeh-Dalmau et al., "Integrating Climate Adaptation and Transboundary Management."
[29] Robinette, Acosta, and Howar, "Year 1 Results of Baseline Monitoring Within the Point Sur to Point Mugu Study Area of the Seabird Protection Network."
[30] California State Parks, "Point Sal SB," CA State Parks, accessed November 20, 2023, https://www.parks.ca.gov/.
[31] County of Santa Barbara California, "Point Sal," County of Santa Barbara Parks, accessed November 20, 2023, https://www.countyofsb.org/900/Point-Sal.
[32] All Trails, "Point Sal Overlook," Travel Website, AllTrails.com, accessed November 20, 2023, https://www.alltrails.com/trail/us/california/point-sal-overlook.
[33] For example, see https://dunescenter.org/event/%f0%9f%a5%bepoint-sal-docent-led-community-hike/

grounds.[34] The California Environmental Protection Agency identifies the adjacent city of Guadalupe as "disadvantaged" under CA Senate Bill 535, and their synthesis of environmental and socioeconomic indicators further reveals that Guadalupe – alongside Santa Maria and Lompoc – are underprivileged communities that experience significant cumulative impacts from pollution.[35] Given these communities' close proximity to Point Sal, implementing an SMCA at the proposed site could enhance access for disadvantaged populations to valuable coastal resources and fishing opportunities, as a popular shore fishing site is located just north of the proposed Point Sal SMCA boundary, near the Rancho Guadalupe Dunes Reserve area. In addition to the designation of a new Point Sal SMCA, we urge the state to redouble its efforts to provide access to Point Sal State Beach by reopening Point Sal Road.

Socioeconomic impacts

Current fishing in the proposed area is limited, likely due to its considerable distance from nearest port areas of Morro Bay and Santa Barbara. The proposed Point Sal MPA overlaps with 14% of California fishing block 631, and 11% of California fishing block 632. According to the Marine Fisheries Data Explorer, annual landings reported from these blocks over a ten year period from 2012 to 2022 were an average of 231,460 lbs by weight and $678,632 by value per year.[36] This represents just 0.11% of the landings by weight, and 1.1% of landings by value, reported for the Central Coast region over the same 10 year period.[37,38] For this reason, and due to the relatively small proposed size of the MPA, we believe the establishment of an SMCA in this area would have minimal economic impact to commercial fisheries.

Our request to CDFW for recreational fishing data from this area was being processed at time of submission; we will evaluate the potential impact to recreational fishers and submit it to the state following receipt of the requested data.

Historical context

During the MLPA planning process, a large SMR around Point Sal was proposed in External Proposed MPA Package AC. The proposed SMR was 21.92 mi^2, with an alongshore span of 6.1 miles and depth range of 0-192 feet. Based upon a review of the historical documents provided by the Fish & Game Commission in October 2023, it is not clear why the state chose not to designate this proposed SMR at that time.

[34] Hunter S. Lenihan et al., "Increasing Spillover Enhances Southern California Spiny Lobster Catch along Marine Reserve Borders," *Ecosphere* 13, no. 6 (2022): e4110, https://doi.org/10.1002/ecs2.4110.
[35] OEHHA, "CalEnviroScreen 4.0," Text, CA.Gov, September 20, 2021, https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40; OEHHA, "Final Designation of Disadvantaged Communities Pursuant to Senate Bill 535" (CalEPA, May 2022).
[36] Assuming equal distribution of effExcellent ort and value across all years. Because smaller timescales resulted in confidential data outputs from the Marine Fisheries Data Explorer, we aggregated 10 years of landings data from both blocks to calculate average annual landings data. However, the state should look into the confidential data to find more detailed estimates of fisheries landings from this area.
[37] We defined the Central Coast region as all fishing blocks from Point Ano Nuevo to Point Conception: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=144496&inline
[38] California Department of Fish and Wildlife, "Marine Fisheries Data Explorer," database, MFDE, accessed November 21, 2023, https://wildlife.ca.gov/Conservation/Marine/Data-Management-Research/MFDE.

The Marine Life Protection Act (MLPA) did not direct how state agencies were to engage or consult with Tribes as sovereign nations during the process of establishing California's MPA Network, and the text of the law did not acknowledge coastal Indigenous peoples' long standing relationships to, dependence on, and stewardship of marine resources. In the years following the MPA network's initial implementation, Tribes, state agencies, and policymakers have made progress to encourage and facilitate Tribal marine co-management and access in MPAs.[39]

Now, as California is conducting its first-ever adaptive management process, the state has the opportunity to more thoroughly include the groups that were underrepresented during the initial implementation of the network. This petition is one of the first Tribally proposed state marine protected areas in California. Designating this MPA would strengthen the role and authority of California Tribes in the state's ocean and marine life protection efforts. With a collaborative co-stewardship approach, the Point Sal MPA would also contribute to the integration of Tribes in California's marine monitoring and management initiatives. Furthermore, this proposal aligns with the state's goal of supporting Tribally-led conservation.[40]

Future stressors may compromise California's coastal waters and nearby MPAs

There is increasing pressure to develop resources in and otherwise utilize California's coastal waters. For example, as efforts intensify to mitigate and adapt to climate change, the state is investing in offshore wind and desalination plants. Interest in ocean-based carbon dioxide removal (CDR) is growing, and aquaculture activities are proliferating. Scientists warn that a rising wave of ocean industrialization, such as underway in California's waters, will pose additional strain on marine biodiversity.[41]

MPAs along the central coast of California will likely experience these types of stressors in the coming decade. Vandenberg SMR, located 17 km to the south of this proposed area, and the Point Buchon SMR/SMCA complex, located 50 km to the north, are both sited near potential future offshore wind development projects. The proposed California Demonstration Project (CADEMO) seeks to place four floating offshore wind turbines in state waters just outside the boundaries of Vandenberg SMR, and would deliver power via a subsea cable traveling under the seafloor to an onshore cable landing site at Vandenberg Space Force Base. The Morro Bay Wind Energy Area is located in federal waters just outside Point Buchon SMCA, and two leases have recently been issued to commercial wind developers to begin planning for offshore wind development. Offshore wind construction and operations are expected to impact the marine environment through increased ocean noise, collisions with turbines, entanglements, the introduction of electromagnetic fields, alterations to existing habitats and hydrodynamics, and

[39] McGinnis, Michael. 2022. *Co-Management of California-Chumash Marine Conservation Areas: A White Paper Produced for the Santa Ynez Band of Chumash Indians.*
[40] California Ocean Protection Council, 2025. "Roadmap to Achieving 30x30 in California's Coastal Waters." https://opc.ca.gov/wp-content/uploads/2025/07/Roadmap-to-Achieving-30x30-in-Californias-Coastal-Waters-508.pdf
[41] Douglas J. McCauley et al., "Marine Defaunation: Animal Loss in the Global Ocean," *Science* 347, no. 6219 (January 16, 2015): 1255641, https://doi.org/10.1126/science.1255641.

the possible release of contaminants.[42] While the state of California is working closely with developers and the federal government to minimize the environmental impacts of these projects as much as possible, it stands to reason that the region, including Vandenberg SMR and the Point Buchon SMR/SMCA complex, will experience some level of adverse impact related to the development of heavily industrialized renewable energy projects.

In addition, Point Buchon SMR/SMCA is located just north of the Diablo Canyon Power Plant, which uses seawater for its once-through cooling process. The plant's intake pipes draw in more than 2.5 billion gallons of water per day. This large and continuous seawater withdrawal is estimated to kill roughly 1.5 billion fish in early life stages each year, as creatures are sucked into the cooling systems or become impinged against the screens on the open-water pipes.[43] The cooling water is also discharged back into the ocean water at a warmer temperature, which can cause additional harm to kelp, fish, and other marine life in the area.[44] While Diablo Canyon's intake is not directly within the Point Buchon SMR/SMCA cluster, the area of source water being drawn into the plant likely overlaps with the MPA boundaries and has the potential to withdraw marine life out of the protected area.

As the increase of local stressors are likely to strain resources in the Vandenberg and Point Buchon MPAs, a new MPA at Point Sal could help to protect similar habitat not subject to these local stressors, adding a helpful replicate MPA to serve as an insurance policy for the region's MPA network.

Climate resilient MPA networks

Changing ocean conditions, such as warming temperatures, acidification, and reduced oxygen, combined with increasing crowding, and pressure on our ecosystems, will compound local stressors mentioned above – putting California's spectacular marine biodiversity at elevated risk. MPAs are increasingly recognized as an important ocean-climate solution. Fully protected MPAs can allow for disturbed and degraded areas to recover, and also promote and retain complex, intact food webs and ecosystems that are better at resisting future stressors.[45] A recent meta-analysis of more than 22,000 peer-reviewed studies spanning more than 200 MPAs around the world demonstrated that marine reserves can significantly enhance carbon

[42] NOAA Fisheries, "Offshore Wind Energy: Protecting Marine Life," Protecting Marine Life, National, accessed November 20, 2023, https://www.fisheries.noaa.gov/topic/offshore-wind-energy/protecting-marine-life.
[43] Mackenzie Shuman, "How California's Last Remaining Nuclear Power Plant Transformed Marine Life off the Coast," *San Luis Obispo Tribune*, March 25, 2022, https://www.sanluisobispo.com/news/local/environment/article258804173.html.
[44] Ibid.
[45] Lewis A.K. Barnett, Marissa L. Baskett, and Louis W. Botsford, "Quantifying the Potential for Marine Reserves or Harvest Reductions to Buffer Temporal Mismatches Caused by Climate Change," *Canadian Journal of Fisheries and Aquatic Sciences* 72, no. 3 (March 2015): 376–89, https://doi.org/10.1139/cjfas-2014-0243; Lewis A. K. Barnett and Marissa L. Baskett, "Marine Reserves Can Enhance Ecological Resilience," ed. Peter Mumby, *Ecology Letters* 18, no. 12 (December 2015): 1301–10, https://doi.org/10.1111/ele.12524; Callum M. Roberts et al., "Marine Reserves Can Mitigate and Promote Adaptation to Climate Change," *Proceedings of the National Academy of Sciences* 114, no. 24 (June 13, 2017): 6167–75, https://doi.org/10.1073/pnas.1701262114.

sequestration, coastal protection, biodiversity, and the reproductive capacity of marine organisms as well as fishers' catch and income.[46]

Further, when designed with climate resilience in mind, MPA networks can provide greater resilience than single MPAs on their own.[47] A new analysis focused on the California Bight has identified 21 actionable guidelines for the design of climate-smart MPA networks across large geographies and international boundaries.[48] The designation of a new MPA at Point Sal would meet or help to advance at least 11 of these climate-smart MPA design guidelines (Appendix A). Specifically, a new MPA at Point Sal would help to increase habitat representation and replication; protect critical and unique areas relevant to the life histories of important California species; incorporate and enhance connectivity across the broader MPA network; provide permanent protections better suited for the maintenance of ecosystem function and resilience at relevant timescales for climate resilience, and; enhance the MPA network's protections for healthy and relatively undisturbed habitats (Appendix A). In the face of increasing impacts related to climate change, it is critical that the state adaptively manage its MPA network with climate resilience in mind.

Relevance to MLPA Goals and DMR Recommendations

This proposed Point Sal SMCA contributes directly to MLPA Goals 1, 2, 3, and 6 (California Marine Life Protection Act). Protecting the rich biodiversity, relatively undisturbed habitats, and important larval retention zone found in the relatively undisturbed waters around Point Sal would help to protect the state's marine life and habitats, marine ecosystems, and marine natural heritage, as well as improve recreational, educational and study opportunities provided by marine ecosystems subject to minimal human disturbance.

In addition, this petition helps to advance a number of DMR Recommendations. As a Tribal petition, the Point Sal SMCA advances DMR Recommendations 1.) "Improve state agencies' tribal engagement and relationship building efforts," 2.) "Create a clear pathway to tribal MPA management," and 3.) "Build tribal capacity to participate in MPA management activities." It also advances Recommendation 4.b.) "Identify and utilize best science-based approaches to inform potential changes to the MPA Network in order to enhance Network performance." New and groundbreaking peer-reviewed guidelines for the design of climate-smart MPA networks have recently been developed, and the proposed MPA at Point Sal aligns strongly with these guidelines.[49] We recommend the state consider these guidelines for the review and implementation of additional proposals to enhance and expand California's MPA network.

We must pass on a healthier ocean for future generations to experience, benefit from, and enjoy. California has the opportunity now to protect the conservation legacy of our iconic coastal state, including its rich and diverse marine wildlife. We urge the state to designate a new MPA

[46] Juliette Jacquemont et al., "Ocean Conservation Boosts Climate Change Mitigation and Adaptation," *One Earth* 5, no. 10 (October 2022): 1126–38, https://doi.org/10.1016/j.oneear.2022.09.002.
[47] Roberts et al., "Marine Reserves Can Mitigate and Promote Adaptation to Climate Change."
[48] Arafeh-Dalmau et al., "Integrating Climate Adaptation and Transboundary Management."
[49] Ibid.

at Point Sal to advance Tribal marine stewardship and enhance the protection and climate resilience of our coastal and ocean resources, for the benefit of current and future generations of Californians.

California Fish and Game Commission

Compilation of Public Comments on Petition 2023-28MPA_AM2

This PDF file compiles public comments that were included as exhibits in meeting materials and supplemental handouts for Commission and Marine Resources Committee (MRC) meetings since November 2023. Additional exhibits and supplemental handouts will be added after each Commission meeting, including those received by the public comment deadline, until the Commission takes final action on the petition.

Note: Commission meeting materials include a representative selection of comments, rather than a comprehensive suite of all related comments received. Given the large volume of public comments received, the Commission has directed staff to summarize comments and provide a representative selection in meeting materials to reflect the range of perspectives shared. Commissioners are able to review a diversity of perspectives while still having access to all individual comments submitted, which are part of the Commission's administrative record. Members of the public may contact staff for access to any written comments not included in this document.

Last updated: through April 21, 2026 FGC

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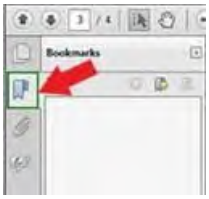

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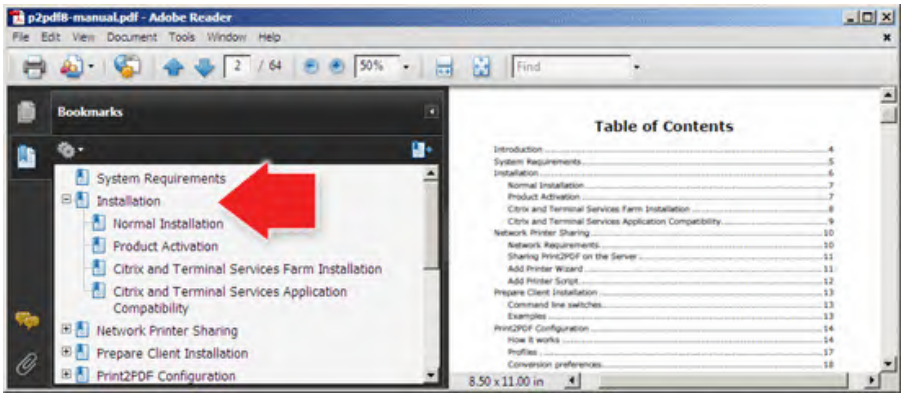

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7. Do not hesitate to contact staff if you have any questions or would like assistance.

From: Aubrie Fowler <[redacted]>
Sent: Wednesday, January 31, 2024 5:12 PM
To: FGC <FGC@fgc.ca.gov>; Ashcraft, Susan@FGC <[redacted]>
Cc: Calla Allison <[redacted]>; Claire Arre <[redacted]>; Jamie Blatter <[redacted]>
Subject: FGC Meeting Binder Submission

Hi Susan and Commission staff,

Please see the attached exhibit (saved as a PDF and Excel sheet, whichever formatting is preferred) to please be added to the meeting binder for the February Fish and Game Commission meeting on 2/14-2/15/2024.

The link to the Google sheet can be found **here** as well; this was the format that the MPA Collaborative Vetted Regulation Recommendations was previously shared with Commission and Department staff.

Please let me know if there's more context you need from me.

Thank you,
Aubrie

Aubrie Fowler (she/her)
South Coast Specialist
MPA Collaborative Network
cell: [redacted]
Sign-up for our Quarterly Newsletter
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County	MPA	Current Regs Summarized	Compliance concerns and/or management problem identified	Regulation Recommendation for Adaptive Management	Consensus?	Justification	Supporting Management Suggestion	Petitioner Lead	Contact Information	Recommendation Category	Designation Change?
Del Norte	Pyramid Point SMCA	Rec take of surf smelt by dip net or Hawaiian type throw net. Tolowa Dee-ni' exempt	Onshore and offshore hook and line fishing, collecting sand crabs as bait, kayak fishers, violations from boaters registered in both CA and OR	Remove allowance for surf smelt by dip net or Hawaiian type throw net; Change to No-Take SMCA with Tribal exemption for Tolowa Dee-ni'	Yes	Smelt is culturally important species to Tolowa and No Take designation will be clearer to public, reducing violations	Signs being vandalized, ripped out. Outreach to gain compliance needed (Guardian Watchmen)	Tolowa Dee-ni' Nation	[redacted]	Take Allowance Change	Yes, from SMCA to No-Take SMCA with Tribal exemption
Del Norte	Pyramid Point SMCA	Rec take of surf smelt by dip net or Hawaiian type throw net. Tolowa Dee-ni' exempt	Elk Valley Rancheria is interested in exploring the possibility of being included in exempt status	Add Elk Valley Rancheria to exempt Tribes if requested by Tribal Council	Yes	Elk Valley Rancheria has ancestral ties to the area				Take Allowance Change	
Del Norte	Pyramid Point SMCA	Rec take of surf smelt by dip net or Hawaiian type throw net. Tolowa Dee-ni' exempt	Boundary is in Oregon	Change northern boundary to align with recognized California/Oregon state line	Yes	Original boundary used a mapping system that does not align with on-the-ground state line.		Tolowa Dee-ni' Nation	[redacted]	Boundary Change	
Del Norte	Point St. George Offshore Reef SMCA	Rec take of salmon by trolling and Dungeness crab by trap. Commercial take of salmon with troll fishing gear and Dungeness crab by trap. Elk Valley and Tolowa Dee-ni' exempt		No change	Yes						
Del Norte	Sea Lion Rock Special Closure	300'	No data	No change	Yes						
Del Norte	Castle Rock Special Closure	300'	Poke poling at Preston Island and Battery Point and Hook Finger Point during extremely low tides. Kayaks near closure	No change	Yes						
Del Norte	False Klamath Rock Special Closure	300' from 3/1-8/31	Low flyovers by US Coast Guard helicopter. Kayaks near closure, kaking kelp. Dogs off leash	No change	Yes		Signs needed at Wilson Creek. Potential site for CoastSnap to crowdsource changes around rock				
Humboldt	Reading Rock SMCA	Rec take of salmon by trolling; surf smelt by dip net or Hawaiian type throw net; Dungeness crab by trap, hoop net or hand. Commercial take of salmon with troll fishing gear; surf smelt by dip net; Dungeness crab by trap. Trinidad, Resighini and Yurok exempt	Hook and line fishing and take of sand crabs regularly occur, especially at southern boundary Gold Bluffs beach traditional smelt camp Track amount of surf smelt taken (25 lbs current limit). Hawaiian Type throw net inappropriate	Work with California Tribes and indigenous people to change “Hawaiian type throw net” to a term that is more reflective of Indigenous Californian net based take methods	Yes	Reference to Hawaiian nets when indigenous terms exist for this take type is inappropriate and disrespectful	Monitor Surf smelt as a part of state monitoring plan.			Language Change	

Humboldt	Reading Rock SMCA	Rec take of salmon by trolling; surf smelt by dip net or Hawaiian type throw net; Dungeness crab by trap, hoop net or hand. Commercial take of salmon with troll fishing gear; surf smelt by dip net; Dungeness crab by trap. Trinidad, Resighini and Yurok exempt		Recommend implementing limits on commercial take of surf smelt	Yes	Culturally important species				Take Allowance Change	
Humboldt	Reading Rock SMR	No Take	Drifting commercial crab pots	No change	Yes						
Humboldt	Samoa SMCA	Rec take of salmon by trolling; surf smelt by dip net or Hawaiian type throw net; Dungeness crab by trap, hoop net or hand. Commercial take of salmon with troll fishing gear; surf smelt by dip net; Dungeness crab by trap. Wiyot exempt	Difficult to determine boundaries	Work with California Tribes and indigenous people to change “Hawaiian type throw net” to a term that is more reflective of Indigenous Californian net based take methods	Yes	Reference to Hawaiian nets when indigenous terms exist for this take type is inappropriate and disrespectful	Monitor recreational and commercial (through landing/block reports) take of salmon by troll and surf smelt by dip net and assess effect on population; Signs with you are here map at Mad River			Language Change	
Humboldt	South Humboldt Bay SMRMA	No Take except waterfowl may be taken. Wiyot exempt	Invasive grasses, loss of eelgrass, general threats to habitat. Non Tribal members clamming. Difficult to identify boundaries within South Humboldt Bay	Determine reason it does not extend to southern water’s edge and extend if no reason	Yes	Clearer for outreach purposes to say from southern end of bay to 2nd hunter pull out	Direct enforcement to look for unlawful clamming			Boundary Change	
Humboldt	Sugarloaf Island Special Closure	300’		No change	Yes						
Humboldt	South Cape Mendocino SMR	No Take	Minimal patrol	No change	Yes		Develop a plan for evaluating remote area MPAs to determine impact, such as temporary M2 radar/drone surveillance; support southern Humboldt patrol by LED				
Humboldt	Steamboat Rock Special Closure	300' 3/1-8/31	Confusion on when it is open to swim out to and when it is closed	No change	Yes		Sign that highlights special closure and closure dates				
Humboldt	Mattole Canyon SMR	No Take	Minimal patrol. Some commercial crab pots observed during USCG flyover	No change	Yes		Develop a plan for evaluating remote area MPAs to determine impact, such as temporary M2 radar/drone surveillance; support southern Humboldt patrol by law enforcement division				
Humboldt	Sea Lion Gulch SMR	No Take	Backpackers harvest mussels along entire Lost Coast Trail; people getting too close to new elephant seal colony. No cell connectivity to determine boundaries of MPA	Move southern boundary south to Cooskie Creek	BLM support but need fisher input	Creek is more identifiable feature for land based outreach to fishers hiking the Lost Coast Trail				Boundary Change	

Humboldt	Big Flat SMCA	Rec take of salmon by trolling and Dungeness crab by trap, hoop net or hand. Commercial take of salmon with troll fishing gear and Dungeness crab by trap. Multiple Tribes exempt	Backpackers harvest mussels along entire Lost Coast Trail; surf fishing occurs at Miller Flat. No cell connectivity to determine boundaries of MPA	No change	Yes		More outreach needed for fishers hiking lost coast. Include more detailed information in BLM Lost Coast map				
Mendocino	Double Cone Rock SMCA	Rec take of salmon by trolling; Dungeness crab by trap, hoop net or hand. Commercial take of salmon with troll fishing gear and Dungeness crab by trap	Unknown. Limited patrol. Report of excessive urchin and need for grazer suppression.	Reassess restoration policy in SMCAs impacted by climate change/kelp loss	Yes	Loss of kelp habitat needs to be addressed in this SMCA	Allow for restoration work/grazer suppression to address urchin barrens (reds and purples)	California Sea Urchin Commission - allow for commercial take of urchin		Other	
Mendocino	Vizcaino Rock Special Closure	300' 3/1-8/31		No change	Yes						
Mendocino	Ten Mile SMR	No Take	Primary concern is shore-based fishing (rod and reel at seaside creek beach). Recreational fishers take rockfish and lingcod, crab pots "walk themselves" into MPA at southern boundary. Dogs off leash	No change	Yes		OK/boundary sign needed at northern boundary. Simplify outreach language around MPA clusters				
Mendocino	Ten Mile Beach SMCA	Rec take of Dungeness crab by trap, hoop net or hand. Commercial take of Dungeness crab by trap. Many Tribes exempt	Unlawful take of fish (rockfish, lingcod); dogs off leash in snowy plover habitat. Potential sand dump site south side of Ten Mile Beach	No change	Yes		Simplify outreach language around MPA clusters				
Mendocino	Ten Mile Estuary SMCA	Waterfowl may be taken. Many Tribes exempt	Limited access for fishers	No change	Yes		Simplify outreach language around MPA clusters				
Mendocino	MacKerricher SMCA	All rec take allowed. Commercial take allowed except for bull kelp and giant kelp	Multiple violations occur daily since closest to Fort Bragg city center (general fish and game code violations). North boundary (Laguna Point) hotspot for intertidal take	Add protection for intertidal zone, per State Parks, in support for protection of the resource and ease of enforcement/outreach	Many in support but no full consensus	There are limited areas in the county to lawfully take intertidal animals such as mussels, turban snails, limpets, etc.	More enforcement support needed due to limited State Parks personnel. Focus on tidepool education. Intertidal specific take signs are needed	State Parks pending review		Take Allowance Change	
Mendocino	Point Cabrillo SMR	No Take	Lighthouse sees lots of boats fishing offshore of Frolic Cove on northern end of Point Cabrillo SMR or inside	No change	Yes		OK boundary signs would be beneficial on both boundaries for kayak fishing				
Mendocino	Russian Gulch SMCA	All rec take allowed. Commercial take allowed except for bull kelp and giant kelp	General fish and game code violations	No change	Yes						

Mendocino	Big River Estuary SMCA	Rec take of surfperch by hook and line from shore only and Dungeness crab by hoop net or hand. Many Tribes exempt. Waterfowl may be taken	Increased use for swimming and recreation has led to safety concerns, including close calls between swimmers and hunters. Swimmers mixing with motorized boats may lead to accidents	Hunting should be prohibited due to high public use/public safety issues, per State Parks	Yes	Community reported incidents of near misses between hunters/boaters and swimmers		State Parks pending review		Allowed Activity Change	
Mendocino	Big River Estuary SMCA	Rec take of surfperch by hook and line from shore only and Dungeness crab by hoop net or hand. Many Tribes exempt. Waterfowl may be taken	Can MPA restrict motorized vessels if not ecological reserve?	Restrict all motorized vessels with allowance for public safety, per State Parks	Yes, with clarification that motorized vessels are only restricted going east (up river)	West access from launch should be allowed for boaters going out to ocean	Data on crab fishery is needed to determine whether allowance is sustainable. Need clear signage restricting snare traps. Pick up after dog signs needed	State Parks pending review		Allowed Activity Change	
Mendocino	Van Damme SMCA	All rec take allowed. Commercial take allowed except for bull kelp and giant kelp	Overtake and take of undersize fish	No change	Yes						
Mendocino	Navarro River Estuary SMCA	Rec take of salmonoids by hook and line. Many Tribes exempt. Waterfowl may be taken	People illegally breach sandbar (but outside MPA?)	No change	Yes						
Mendocino	Point Arena SMR	No Take	Fishing in SMR reported by lighthouse manager	No change	Yes		OK boundary signs needed				
Mendocino	Point Arena SMCA	Rec take of salmon by trolling. Commercial take of salmon with troll fishing gear		No change	Yes						
Mendocino	Sea Lion Cove	Rec and commercial take of finfish	Urchin barrens	Reassess restoration policy in SMCAs impacted by climate change/kelp loss	Yes		Allow for restoration work/grazer suppression to address urchin barrens (reds and purples)	California Sea Urchin Commission - allow for commercial take of urchin		Other	
Mendocino	Saunders Reef SMCA	Rec take of salmon by trolling. Commercial take of salmon with troll fishing gear and urchin	Citations issued for people diving and taking at Schooner Gulch; illegal shore fishing from Hearn Gulch	No change	Yes		Additional enforcement personnel/efforts are needed				
Sonoma	Del Mar Landing SMR	No Take	Fishing at north end	No change	Yes		Trail pamphlets with MPA information				
Sonoma	Stewarts Point SMR	No Take	Poaching at 3 mile line. Difficult for fishers to determine where 3 mile line is and difficult to enforce from land	Allow for trolling of salmon. Change to SMCA?	No. Discussed with no strong opposition but more info needed	Impact to commercial salmon fishing can be addressed with minimal impact to other resources	More signage needed at public access points			Take Allowance Change	Yes, would change SMR to SMCA. No consensus
Sonoma	Stewarts Point SMCA	Rec take from shore only of marine aquatic plants other than sea palm, marine invertebrates, finfish by hook and line, surf smelt by beach net, species authorized by hand-held dip net	Tribal based MPA	Prohibit all take and add Kashia Pomo to Tribal exemptions to make affirmative rights of Tribal Members re: collection, harvesting, and research	Yes	MPA is only accessed by Kashia Tribal members from shore (owned by Tribe) so would be same protection while acknowledging Tribal rights				Take Allowance Change	Yes, change from SMCA to No-Take SMCA with Tribal exemption

Sonoma	Salt Point SMCA	Recreational take of abalone and finfish allowed	Take of abalone during closure; poaching of intertidal species. Confusion regarding intertidal take	No change	Yes		Needs more signage on collecting/take of shellfish and other non finfish				
Sonoma	Gerstle Cove SMR	No Take	Excessive intertidal take. Rec fishers fishing the line	No change	Yes		Need for good tidepooler rules signs to address harmful tidepooling				
Sonoma	Russian River SMRMA	No take except waterfowl may be taken	Marine mammal disturbance occurring. County of Sonoma needs to conduct restoration work as part of management plan	Allow for restoration work in SMRMA	Yes	Restoration will not impact haul out sites, marine mammals or birds				Other	
Sonoma	Russian River SMCA	Rec take of Dungeness crab by trap, and surf smelt by hand-held dip net or beach net. Commercial take of Dungeness crab by trap	Illegal onshore and offshore fishing; seal disturbance "seal selfies" near Goat Rock. Trash/dogs off leash	No change	Yes		More outreach for out of town fishers/permanent signage				
Sonoma	Bodega Head SMR	No Take	Take of rockfish and trolling for salmon; fishing on northern boundary off rocks Difficult “fan” shape and hard to identify northern boundary makes enforcement difficult	No change	Yes	Would require new outreach					
Sonoma/Marin	Bodega Head SMCA	Rec take of pelagic finfish by trolling, Dungeness crab by trap, and market squid by hand-held dip net. Commercial take of pelagic finfish by troll fishing gear and round haul net, Dungeness crab by trap, and market squid by round haul net	Take of rockfish and trolling for salmon; fishing on northern boundary off rocks Difficult “fan” shape and hard to identify northern boundary makes enforcement difficult	No change	Yes						
Sonoma/Marin	Estero Americano SMRMA	No take except waterfowl may be taken	Confusion as to boundary “high tide line” and who manages strip of beach between ocean and estuary that is often closed; Difficulty identifying eastern boundary. No way to see boundary from shore	No change	Yes		More signs needed at access points here to address compliance concerns				
Marin	Estero de San Antonio SMRMA	No take except waterfowl may be taken	Some take (animal remains) and illegal fishing	No change	Yes						
Marin	Point Reyes SMR	No take	Sand dollar and fossil take, rod and reel fishing from vessels, party boats troll for salmon; violations are limited offshore	No change	Yes		Signage and more enforcement needed, especially at Drakes Beach and Coast Guard Station. Consolidated mixed messaging signs, with dog information.				

Marin	Point Reyes SMCA	Rec take of salmon by trolling and Dungeness crab by trap. Commercial take of salmon with troll fishing gear and Dungeness crab by trap	Commercial crabbers set coonstripe shrimp traps on top of crab traps; Boundaries in MPA cluster hard to identify; NPS jurisdiction limited to	No change	Yes						
Marin	Point Reyes Headlands Special Closure	No access from mean high tide line to a distance of 1000 feet seaward	Recreational vessels fishing in summer; Disturbance spiked in 2020; USFW continues to monitor this area	No change at this time	Yes	Might need to revisit making adjustments in the future if data shows changes/increases in disturbance					
Marin	Estero de Limantour SMR	No take	Difficult to determine boundary between SMR and Drakes Estero SMCA makes enforcement difficult. There are suspicions that poaching of clams occurs in the SMR from people on kayaks from Drakes Estero	Extend SMR designation all the way into Drakes Estero	Yes	NPS in support of expanding SMR because federally designated wilderness, major harbor seal haul out, and critical nursery habitat for leopard shark and bay rays		EAC Marin with NPS letter of support		Boundary Change	
Marin	Drakes Estero SMCA	The recreational take of clams is allowed	Difficult to determine boundary line between Drakes Estero SMCA and Estero de Limantour SMR leading to poaching. Cows accessing/pooping from NPS ranch leased land	Prohibit clamming in Drakes Estero SMCA. Merge with Estero de Limantour SMR.	Yes	SMCA designation was originally due to oyster farm that is no longer there. NPS in support of making into a SMR due to federally designated wilderness area	Give people direction/ outreach materials on where they CAN clam safely	EAC Marin with NPS letter of support		Take Allowance Change	Yes, change from SMCA to SMR
Marin	Point Resistance Rock Special Closure	No access from mean high tide line to a distance of 300 feet seaward of rock	Seabird flushing by vessels. USFW monitoring area.	No change	Yes	GFNMS thinks current regulations are good, very important to their mission and public outreach					
Marin	Double Point/Stormy Stack Special Closure	No access from mean high tide line to a distance of 300 feet seaward of rock	Seabird flushing by vessels and surfers, who enter harbor seal rookery. Increased visitation due to people hiking to Alamere Falls	No change	Yes	GFNMS thinks current regulations are good, very important to their mission and public outreach and don't want to extend to shore to allow shore access	Put signs with regulations and text about importance of special closure at trailhead; more outreach to boaters about special closures needed				

Marin	Duxbury Reef SMCA	Recreational take of finfish from shore and abalone* is allowed	Difficult to enforce and outreach about why you can take finfish but not invertebrates. Beach Watch data at this site for 30 years show slight decrease in activities in last 10 years, but take of invertebrates has been observed, and the Greater Farallones National Marine Sanctuary Superintendent has provided information about the need to consider additional conservation measures at Duxbury Reef. Maria Brown (NMS) submitted a letter saying Duxbury Reef would benefit from increased protection of unique and important habitat of entire reef (largest shale reef in N. America). EAC MPA Watch data shows	Change to SMR because of difficulty of interpretation and enforcement. Extend southern boundary further out to sea (south) and northern boundary to Double Point to fully cover reef	No	No agreement on extending boundaries to cover the reef and changing to SMR. More research needed on benefits of changing existing ribbon from SMCA to SMR; Might be important fishing access point for public	More signs needed and more support for onsite education and enforcement from CDFW to agate beach and land-side terrestrial Duxbury	EAC Marin		Take Allowance Change	Yes, would change SMCA to SMR. No consensus
Marin	Duxbury Reef SMCA	Recreational take of finfish from shore and abalone* is allowed	Heavy use and impacts, intertidal take – buckets and tools (e.g., crow bars, tire jacks) used to take black turban snails and purple urchin that are nestled into cracks. People need to break the reef to get to purple urchin	Potential compromise would be to add specific tidepool protections, similar to OC	TBD	NMS would like to continue conversation to explore potential compromises	Research other tidepool docent programs in MPAs with mixed use of allowed fishing/tidepool protections			Language Change	
San Francisco	North Farallon Islands SMR	No Take	Commercial crab case here	No change	Yes	More data needed for this MPA cluster	Increase CDFW LED patrols during peak months. Need for CCFRP program here				
San Francisco	North Farallon Islands Special Closure	No vessel shall be operated or anchored at any time from the mean high tide line to a distance of 1000 feet seaward of the mean lower low tide line of any shoreline of North Farallon Island, or to a distance of 300 feet seaward of the mean lower low tide line of any shoreline of the remaining three southern islets		No change	Yes						

San Francisco	Southeast Farallon Islands SMR	No Take	Small recreational boats. A number of encroachments occur into SMR during better weather months	No change	Yes		Increase patrols from LED and consider M2 radar at this location				
San Francisco	Southeast Farallon Islands SMCA	Recreational take of salmon by trolling and commercial take of salmon by troll fishing gear	Salmon fishers use salmon gear to fish for halibut	No change	Yes						
San Francisco	Southeast Farallon Islands Special Closure	Closed 300 feet seaward year-round, except Fisherman's Bay to East Landing, southeastern tip of the island and southeastern side of Saddle (Seal) Rock, which is closed from December 1 through September 14. 5 mile per hour speed limit 1000 ft seaward of mean lower low tide of any shoreline Exhaust system requirements for commercial dive boats	Boats cut across the special closure	No change	Yes	Predates MLPA process, careful consideration went into crafting special closure regulations					
San Mateo	Egg (Devil's Slide) Rock to Devil's Slide Special Closure	A special closure is designated from the mean high tide line to a distance of 300 feet seaward of the mean lower low tide line of any shoreline of any of the three rocks comprising Egg (Devil's Slide) Rock; Transit in between the rock and the mainland between these points is prohibited at any time.	Reported violations include fishing boats inside boundaries and low flying aircraft/drones	Change name to "Devil's Slide Special Closure"	Yes	Egg rock is no longer a name used/recognized locally. Devil's Slide is more appropriate and simpler for outreach				Language Change	
San Mateo	Montara SMR	No Take	A top cited MPA in Central Coast, highest in San Mateo; fishing offshore and tidepool take; Difficulty interpreting southern boundary	Move Montara SMR onshore southern boundary to current Pillar Point SMCA southern boundary (north end of Maverick's Beach), then extending out to current offshore southern SMR boundary point	Yes	Easier for enforcement and makes SMR boundaries consistent with Fitzgerald Marine Reserve boundaries				Boundary Change	

San Mateo	Pillar Point SMCA	The recreational take of pelagic finfish by trolling, Dungeness crab by trap, and market squid by hand-held dip net is allowed. The commercial take of pelagic finfish by troll or round haul net Dungeness crab by trap, and market squid by round haul net is allowed.	Unclear boundary leads to poaching in intertidal Difficult for local law enforcement to ensure compliance of tidepool take regulations due to high volume of consumptive visitors	Extend southern SMCA boundary further south to edge of harbor jetty, extending out to existing offshore southern point. Onshore northern boundary would be same as Montara SMR onshore southern boundary	Yes	Would cover entire reef in MPA for ease of allied agency outreach and enforcement.				Boundary Change	
San Mateo	Pillar Point SMCA	The recreational take of pelagic finfish by trolling, Dungeness crab by trap, and market squid by hand-held dip net is allowed. The commercial take of pelagic finfish by troll or round haul net Dungeness crab by trap, and market squid by round haul net is allowed.		Change regulations to allow for recreational hook and line take of finfish from shore and take of mussels, crabs, snails and seaweeds for equity and access purposes	Yes	Allowing for shore based hook and line and some intertidal take maintains access for consumptive users while applying some protection for a heavily impacted habitat				Take Allowance Change	
San Mateo/Santa Cruz	Año Nuevo SMR	No Take	Unlawful take of snails; fishing; wildlife disturbance. Boats driving squid out of MPA. Confusion because sign at top of trail to Greyhound Rock says fishing beach but must go left at bottom to legally fish	Move southern boundary line to have whole of Greyhound Rock in SMR	Yes, at both Santa Cruz and San Mateo Collaborative meetings	Clearer boundary makes enforcement easier	Ensure sign with map at bottom of trail. Utilize social/digital/traditional media for public outreach	State Parks pending review		Boundary Change	
San Mateo/Santa Cruz	Greyhound Rock SMCA	Rec take of giant kelp by hand harvest only, market squid, salmon. Other finfish by hook and line only from shore. Commercial take of giant kelp by hand harvest only, salmon and market squid	Take of mussels at southern boundary Confusion with Año Nuevo SMR boundary/whether fishing is allowed at Greyhound Rock Split between 2 counties	Move northern boundary line to have whole of Greyhound Rock outside of SMCA and in SMR; Move southern boundary south to beginning of Scott Creek bridge	Yes, at both Santa Cruz and San Mateo Collaborative meetings	Reef should be fully protected or fully open. Preference to cover reef but either way will have clearer boundary for outreach/enforcement. Move of southern boundary would cover reef to address intertidal impacts	Need for sign with map at Scotts Creek	State Parks pending review		Boundary Change	
San Mateo/Santa Cruz	Greyhound Rock SMCA	Rec take of giant kelp by hand harvest only, market squid, salmon. Other finfish by hook and line only from shore. Commercial take of giant kelp by hand harvest only, salmon and market squid	Confusing regulations	Replace comma with semi-colon in regulations after "giant kelp by hand harvest only", or otherwise edit	Yes	Clearer language needed to clarify you are not required to catch salmon and squid by hand harvest only		State Parks pending review		Language Change	Section 100 change
Santa Cruz	Natural Bridges SMR	No Take	Hard to identify boundaries; safety concerns with fishers and swimmers at Natural Bridges State Park beach	Shift both boundaries south to more identifiable features (4 mile point and Natural Bridge)	Yes	State Parks would like SMR to cover the beach at Natural Bridges SP for public safety reasons	Need for interpretive signs with maps/good tidepooler rules, why MPAs, etc.	State Parks pending review		Boundary Change	
Santa Cruz	Soquel Canyon SMCA	Rec and commercial take of pelagic finfish	Split between 2 counties	No change	Yes						

Monterey	Elkhorn Slough SMR	No Take	Fishing occurs regularly at Kirby Park pier/dock, was originally built for fishers with disabilities with SFRA grant. Inconsistent enforcement.	Move northern boundary south of Kirby Park pier/dock. Shift entire MPA to maintain size	Yes, at both Santa Cruz and Monterey Collaborative meetings	Opens fishing area as originally intended to limit poaching; supports increased enforcement presence in area	If Kirby is open, must be concerted cross-jurisdictional effort to enforce shore waste of fish/debris and other F&G Code violations. Need for good fishing practices outreach	Elkhorn Slough Foundation		Boundary Change	
Monterey	Elkhorn Slough SMCA	The recreational take of finfish by hook and line only and clams is allowed. Clams may only be taken on the north shore of the slough in the area adjacent to the Moss Landing State Wildlife Area [subsection 550(a)].	Difficult to determine where SMR/SMCA boundary is (i.e., where kayak fishers can no longer fish).	Move SMR line to bird watching platform (eastern side)	Yes, at both Santa Cruz and Monterey Collaborative meetings	Bird watching platform provides a clear boundary for shore and kayak fishers and would maintain size of SMR with shift off Kirby		Elkhorn Slough Foundation		Boundary Change	
Monterey	Elkhorn Slough SMCA	The recreational take of finfish by hook and line only and clams is allowed. Clams may only be taken on the north shore of the slough in the area adjacent to the Moss Landing State Wildlife Area [subsection 550(a)].	Clamming disturbs sea otter rafts. Huge amounts of trash (fishing receptacles full)	Removing allowance for clamming to address impact to otters and human health considerations	Maybe?	Need more info on impact to recreational clammers and safety of consuming clams	Need for more trash receptacles/removal	Elkhorn Slough Foundation		Take Allowance Change	
Monterey	Moro Cojo Slough State Marine Reserve	No take	Some access on eastern end. Agricultural influence. Elkhorn Slough NERR in support of no change	No change	Yes						
Monterey/Santa Cruz	Soquel Canyon State Marine Conservation Area	Recreational and commercial take of pelagic finfish is allowed	Many violations, especially illegally set crab traps (commercial) and rockfish take (recreational). Whale disturbance. More impact due to depth restrictions lifted	No change	Yes						
Monterey	Portuguese Ledge State Marine Conservation Area	Recreational and commercial take of pelagic finfish is allowed	Many violations, especially rockfish take (recreational). Whale disturbance	No change	Yes						
Monterey	Edward F. Ricketts State Marine Conservation Area	Recreational take of finfish by hook and line. Commercial take of giant kelp and bull kelp by hand	Fishing debris from Coast Guard pier. Abalone and other intertidal poaching at breakwater	Explore regulations to limit fishing gear loss from Coast Guard pier (such as requiring use of breakaway leaders or no braided line)	Yes	Fishing gear loss impacts wildlife, habitat, and safety of divers due to entanglement	Partner with MBNMS on outreach of litter/derelict fishing gear			Language Change	
Monterey	Edward F. Ricketts State Marine Conservation Area	Recreational take of finfish by hook and line. Commercial take of giant kelp and bull kelp by hand	New regulations may restrict fishing for rockfish from boat close to shore after October 1	Change to SMR and join with Lovers Point-Julia Platt SMR	Maybe	No strong opposition but no fishing reps present		Giant Giant Kelp Restoration Project (G2KR)		Take Allowance Change	Yes, would change from SMCA to SMR

Monterey	Edward F. Ricketts State Marine Conservation Area	Recreational take of finfish by hook and line. Commercial take of giant kelp and bull kelp by hand		Allow restoration/urchin culling without requiring SCP	No	May lead to destruction of healthy urchins		Giant Giant Kelp Restoration Project (G2KR) - applies to Ed Ricketts, PG Gardens, and Carmel Bay SMCAs, and will include suggestion for buoys on sites		Other	
Monterey	Lovers Point- Julia Platt State Marine Reserve	No Take	Fishing off Lovers Point rocks, undersize and immature fish, spearfishers and fishing boats catch halibut, illegal tidepool take; confusion around northern boundary line	Move southern boundary line so Lovers Point is either all in or all out (with preference for all in reserve)	No	Disagreement about where to move line	Boundary marker or fishing/no fishing arrow sign needed if boundary doesn't change			Boundary Change	
Monterey	Lovers Point- Julia Platt State Marine Reserve	No Take		Move southern boundary to end of Lovers Point, splitting point equally in half	Yes	Fishing/No fishing arrow signs would make sense/be more accurate	Fishing/no fishing arrow sign needed at Lovers Point			Boundary Change	
Monterey	Pacific Grove Marine Gardens State Marine Conservation Area	Recreational take of finfish. Commercial take of giant kelp and bull kelp by hand	Spearfishing violations, especially from kayaks and dinghies; illegal take of scallops and crustaceans; undersize and immature fish taken Point Pinos is key oystercatcher nesting habitat	Move both boundary lines so Lovers Point and Point Pinos are all out of SMCA and in SMRs because both are key oystercatcher nesting sites	No	Rock outcropping and buoy at Point Pinos (southern boundary) are currently good boundary indicators for boaters				Boundary Change	
Monterey	Pacific Grove Marine Gardens State Marine Conservation Area	Recreational take of finfish. Commercial take of giant kelp and bull kelp by hand		Move northern boundary to end of Lovers Point	Yes	Fishing/No fishing arrow signs would make sense/be more accurate	Fishing/no fishing arrow sign needed at Lovers Point and Point Pinos			Boundary Change	
Monterey	Pacific Grove Marine Gardens State Marine Conservation Area	Recreational take of finfish. Commercial take of giant kelp and bull kelp by hand	New regulations may restrict fishing for rockfish from boat close to shore after October 1	Change to SMR, join with Lovers Point SMR	Maybe	No strong opposition but no fishing reps present		Giant Giant Kelp Restoration Project (G2KR)		Take Allowance Change	Yes, would change from SMCA to SMR
Monterey	Asilomar State Marine Reserve	No Take	Onshore and offshore fishing common, hook and line from nooks and crannies; harmful tidepooling, tidepool take; wildlife disturbance common Northern boundary at Point Pinos is confusing, splits rocks in half	No change	Yes		Fishing/No Fishing arrow signs needed at Point Pinos				
Monterey	Carmel Pinnacles State Marine Reserve	No Take	Offshore violations common	No change	Yes						
Monterey	Carmel Bay State Marine Conservation Area	Recreational take of finfish. Commercial take of giant kelp and bull kelp by hand	Intertidal take common, including abalone and mussels. Golf balls go into MPA and are not collected. Some kelp take at Stillwater Cove	No change	Yes		Work with Pebble Beach on reducing golf ball litter either through requiring biodegradable balls at key holes or ensuring balls are collected by divers				
Monterey	Point Lobos State Marine Reserve	No Take	Take occurs. Boundaries are confusing	No change	Yes						

Monterey	Point Lobos State Marine Reserve	No Take		Allow restoration/urchin culling	No	Difficult for enforcement/interpretation in no-take area		Giant Giant Kelp Restoration Project (G2KR)		Other	
Monterey	Point Lobos State Marine Conservation Area	Recreational take of salmon and albacore and the commercial take of salmon, albacore, and spot prawn is allowed		No change	Yes						
Monterey	Point Sur State Marine Reserve	No Take	Violations common between SMR and SMCA, southern corner is hard to enforce. Abalone case reported	Encompass the whole coastline of Point Sur in MPA	No	Keep boundaries as is				Boundary Change	
Monterey	Point Sur State Marine Conservation Area	Recreational and commercial take of salmon and albacore		Add bluefin tuna to list of species allowed for take	No	Lessens protection				Take Allowance Change	
Monterey	Big Creek State Marine Reserve	No Take	L-shape of SMR within SMCA is confusing	No change	Yes						
Monterey	Big Creek State Marine Conservation Area	Recreational take of salmon and albacore. Commercial take of salmon, albacore	Potential unlawful fishing off Marine Lab	No change	Yes						
San Luis Obispo	Piedras Blancas State Marine Reserve	No take	Missing signs. Onshore fishing violations (poaching mussels at Point Sierra Nevada). Wildlife disturbance. Extreme angle makes kayak fishers look like they are fishing in SMR	No change	Yes		Use boundary images on signs to help reference angle at pullout.				
San Luis Obispo	Piedras Blancas State Marine Conservation Area	Recreational and commercial take of salmon and albacore	Occasional poaching observed. Fishing for rockfish. No albacore, limited salmon observed by fishers/wardens	No change	Yes						
San Luis Obispo	Cambria State Marine Conservation Area	All recreational take is allowed	Harmful tidepooling occurring throughout MPA. Difficult to message good tidepooler rules without designated protections	Add tidepool protection language similar to Crystal Cove and Dana Point SMCAs	Yes	Would make it easier to message about responsible tidepooling and reduce inadvertent take	Tools for existing SP tidepool docent program needed here, such as Natural Bridges State Park tidepool cart	State Parks pending review; Environment California?		Take Allowance Change	
San Luis Obispo	Cambria State Marine Conservation Area	All recreational take is allowed	Boundary between Cambria SMCA and White Rock SMCA is confusing, leading to accidental poaching by kayak fishers putting in at boundary at Wedgewood	Shift White Rock SMCA northern boundary to end of neighborhood at Lampton Park. Shift southern boundary south 1/2 mile accordingly to not lose any protection and cover some kelp habitat	Yes	May be some pushback from commercial live rockfish fishery for southern shift but recreational anglers in support		Environment California?		Boundary Change	
San Luis Obispo	Cambria State Marine Conservation Area	All recreational take is allowed	No commercial take allowed but there is an existing kelp lease?	Remove kelp lease 209 OR clarify that lease holder cannot harvest within Cambria SMCA	Yes	Commercial harvest of kelp is incompatible with MPA regulations that allow recreational take only		Environment California?		Other	

San Luis Obispo	White Rock State Marine Conservation Area	Commercial take of giant kelp and bull kelp with valid lease	Boundary between Cambria SMCA and White Rock SMCA is confusing, leading to accidental poaching of kayak fishers putting in at boundary at Wedgewood	Shift White Rock SMCA northern boundary to end of neighborhood at Lampton Park. Shift southern boundary south 1/2 mile accordingly to not lose any protection	Yes	May be some pushback from commercial live rockfish fishery for southern shift but recreational anglers in support		Environment California?		Boundary Change	
San Luis Obispo	White Rock State Marine Conservation Area	Commercial take of giant kelp and bull kelp with valid lease		Prohibit commercial take of giant kelp and bull kelp with valid lease and change to an SMR	Yes	Original intent was a reserve but there was existing kelp lease. Current lease holder is fine with relinquishing/ disallowing take of kelp		Environment California?		Take Allowance Change	Yes, would change from SMCA to SMR
San Luis Obispo	Morro Bay State Marine Recreational Management Area	Waterfowl hunting allowed. Recreational take of finfish north of line at Pasadena Point. Aquaculture allowed	Poaching occurs at southern side that does not allow take of finfish. Line is confusing and unclear on maps and outreach materials. Illegal invertebrate take (e.g., sea stars at jetty, ghost shrimp at Windy Cove). Signs needed at blue pier	Shift no fishing boundary 150 yds north to public access at Pasadena Park (between Santa Ysabel and Baywood Way)	Yes	Makes it easier for county to manage and educate more accurately about fishing/no fishing line	Signs needed, especially at Blue Pier. County can install sign at Pasadena Park			Boundary Change	
San Luis Obispo	Morro Bay State Marine Recreational Management Area	Waterfowl hunting allowed. Recreational take of finfish north of line at Pasadena Point. Aquaculture allowed	Hunting "within" a bird sanctuary (City of Morro Bay) is confusing, safety concerns for paddlers with increased visitors who are unaware hunting is allowed. Concern about safety issues around hunting around neighborhoods. Trampling of plants occur on shoreline in Baywood Park.	No change to regulations at this time	Yes	Important hunting area. Confusion should be addressed through outreach	Overlay hunting map on SMRMA for outreach purposes Mixed message signs/more education needed about estuary impacts/erosion: "tread lightly" in Los Osos				
San Luis Obispo	Morro Bay State Marine Reserve	No Take	Some hunting violations, hugging line; Boardwalks work to protect birds! Might be good to have one at Baywood Park at 1st Street	No change (reluctantly)	Yes	Some desire to extend SMR west and into bottom part of bay beneath Baywood Peninsula but do not want to impede on aquaculture	More education and outreach needed				
San Luis Obispo	Point Buchon State Marine Reserve	No Take	Regular poaching offshore, trolling, and stopping to drop a line in water. Busiest MPA in SLO, most violations observed/cited	Move northern boundary to actual Point Buchon	Yes	Clearer boundary for fishers coming from Port San Luis	Boundary marker needed here. Make "flagpole" more visible (hang flag?) if boundary doesn't change	State Parks pending review		Boundary Change	
San Luis Obispo	Point Buchon State Marine Conservation Area	Recreational and commercial take of salmon and albacore allowed	Regular poaching, rockfish and lingcod, maybe some squid boats?	No change	Yes						

Santa Barbara and Ventura (Santa Barbara Channel)	Vandenberg SMR	No Take	Vandenberg Space Force Base (VSFB) allows active-duty officers, their dependents/families, and guests to fish off Vandenberg. Leads to confusion since officially a no-take area. Regulations should match take allowed. Petition has been submitted by City of Lompoc to allow shore fishing at Surf Beach	Change designation to SMCA that allows hook and line for finfish from shore only	Yes	Would increase actual protection due to past 5 Base Commanders' decision to allow all legal take on base and would address equity concerns by allowing access for non-military at Surf Beach		Greg Helms to propose intertidal ribbon		Take Allowance Change	Yes, would change from SMR to SMCA
Santa Barbara and Ventura (Santa Barbara Channel)	Vandenberg SMR	No Take		Revaluate MOA with VSFB that is being interpreted as allowing for full military recreational take in a no-take SMR	No, not needed if designation is changed to SMCA	Vandenberg conservation officer will enforce updated take regs on military personnel				Other	
Santa Barbara and Ventura (Santa Barbara Channel)	Point Conception SMR	No Take	Recent groundfish case. Difficult for enforcement to access from land through Dangermond Preserve. M2 radar at Pt. Conception shows a lot of boating activity, may	No change	Yes		Provide continued support for M2 radar with ground truthing and continued coordination/info sharing between agencies				
Santa Barbara and Ventura (Santa Barbara Channel)	Kashtayit SMCA	Rec take of finfish, invertebrates (except rock scallops and mussels) and giant kelp by hand harvest. Santa Ynez band of Chumash exempt	Illegal and dangerous access down the bluffs on Gaviota. Fishing without a license. Access issues for pier fishers with Gaviota pier closed. Difficult to interpret	Reword regulations for clarity of outreach: "Recreational take of finfish, invertebrates, and giant kelp allowed"	Yes	Simpler regulations will make outreach easier, increasing compliance, with minimal impacts to the resources	Have FGC/State push for pier repair at Gaviota Pier (SB County/State Parks) for safety/access reasons	State Parks pending review/Greg Helms		Language Change	Section 100 change
Santa Barbara and Ventura (Santa Barbara Channel)	Naples SMCA	Rec take by spearfishing of white seabass and pelagic finfish. Commercial take of giant kelp by hand or mechanical harvest. Santa Ynez Band of Chumash exempt	Hook and line fishing and access issues occur here, and most days there are at least two vehicles for fishing or surfing parked near Naples. Impact to hook and line fishers	Add hook and line to allowed method of take	No	Numbers/impact/level of take different between hook and line and spearfishing. Would drastically reduce protection				Take Allowance Change	
Santa Barbara and Ventura (Santa Barbara Channel)	Campus Point No-Take SMCA	No Take	Onshore and offshore hook and line fishing continues to be observed	Change purple to red for outreach purposes	Yes	Easier to explain "no take" if consistent with red SMR		Greg Helms		Other	
Santa Barbara and Ventura (Santa Barbara Channel)	Goleta Slough No-Take SMCA	No Take	Trespassing (e.g., illegal swimming, dogs). People occasionally use nets to fish here and/or fish off bridges at the finger boundaries of the slough. Dumping of sediment still occurs in Goleta Bay	Consider water quality designation for Goleta Bay	Yes	Goleta Bay is between two MPAs and there is a need to address impacts of sediment dumping to subsistence fishers off Goleta Pier		Greg Helms		Other	
Santa Barbara and Ventura (Santa Barbara Channel)	Goleta Slough No-Take SMCA	No Take		Change purple to red for outreach purposes	Yes	Easier to explain "no take" if consistent with red SMR		Greg Helms		Other	

Santa Barbara and Ventura (Santa Barbara Channel)	Richardson Rock SFMR	No Take		No change	Yes						
Santa Barbara and Ventura (Santa Barbara Channel)	San Miguel Island Special Closure	Allowance for sea urchin divers between Castle Rock and Judith Rock SMR western boundary (Point Bennet) between 3/15-4/30 and 10/1-12/15.	Commercial urchin poaching. Purpose to reduce disturbance to pinniped populations. Is closure still necessary? Point Bennet has one of the largest pinniped (six species) rookeries on the West Coast of North America	Revaluate need for special closure (SC); Clean up language to address confusion between 300 yards describing SC and 100 yards keeping boats from whole Island 102 A.1.(a)	Yes		M2 radar at NMFS marine mammal station	Greg Helms		Language Change	
Santa Barbara and Ventura (Santa Barbara Channel)	Harris Point SFMR	No Take	CDFW sees some fishers that are taking from shore, although it is not common	No change	Yes		Use land-based range markers (e.g., O & K) to mark boundaries				
Santa Barbara and Ventura (Santa Barbara Channel)	Judith Rock SFMR	No Take		No change	Yes		Use land-based range markers (e.g., O & K) to mark boundaries				
Santa Barbara and Ventura (Santa Barbara Channel)	Carrington Point SMR	No Take	Confusing angle relative to pier	No change	Yes	NPS outreach on angle has been good	More permanent boundary markers/signage is needed				
Santa Barbara and Ventura (Santa Barbara Channel)	Skunk Point SMR	No Take	Difficult to determine how far offshore boats are (in or out)	No change	Yes						
Santa Barbara and Ventura (Santa Barbara Channel)	South Point SFMR	No Take		No change	Yes						
Santa Barbara and Ventura (Santa Barbara Channel)	Painted Cave SMCA	Rec take of spiny lobster and pelagic finfish	People are taking non-pelagic fish species, rockfish, California sheephead, and live fish	No change	Yes						
Santa Barbara and Ventura (Santa Barbara Channel)	Gull Island SFMR	No Take		Have state discuss with NMS changing federal area to FMCA to allow for take of pelagics	No	More data/justification needed				Take Allowance Change	Yes, would turn federal MRs into federal MCAs. No consensus
Santa Barbara and Ventura (Santa Barbara Channel)	Scorpion SFMR	No Take	Fishing/take in little coves at eastern boundaries. Lobster traps	No change	Yes		More on-island enforcement presence needed				
Santa Barbara and Ventura (Santa Barbara Channel)	Anacapa Island Special Closure	No net or trap may be used in waters less than 20 feet deep. Brown Pelican closure from Portuguese Rock to Frenchy's Cove 1/1-10/31	Brown pelican area makes it difficult for Island Packers and others to land legally at Frenchy's	Add exemption to allow access/landing Frenchy's Cove	Yes	Intent was to allow landing at Frenchy's Cove but aligning brown pelican closure with SMR/SMCA boundary closed off access to safe landing		Greg Helms		Allowed Activity Change	
Santa Barbara and Ventura (Santa Barbara Channel)	Anacapa Island Special Closure	No net or trap may be used in waters less than 20 feet deep. Brown Pelican closure from Portuguese Rock to Frenchy's Cove 1/1-10/32	Depth hard to enforce due to sheer drop off from island	Reassess need for Special Closure and consider removing if not justified	Yes	May only need brown pelican closure rather than full island special closure to protect seabirds		Greg Helms		Allowed Activity Change	Yes, would remove special closure

Santa Barbara and Ventura (Santa Barbara Channel)	Anacapa Island SFMCA	Rec take of spiny lobster and pelagic finfish. Commercial take of spiny lobster. Santa Ynez Band of Chumash exempt	Confusion regarding what "pelagic" means may lead to unlawful take	No change	Yes		Outreach needed around pelagics				
Santa Barbara and Ventura (Santa Barbara Channel)	Anacapa Island SFMR	No Take	Violations for unlawful take	No change	Yes						
Santa Barbara and Ventura (Santa Barbara Channel)	Footprint SFMR	No Take	Lots of violations. Boats drift in because they cannot anchor	Have state discuss with NMS changing federal area to FMCA to allow for take of pelagics	No	More data/justification needed				Take Allowance Change	Yes, would turn federal MRs into federal MCAs. No consensus
Santa Barbara and Ventura (Santa Barbara Channel)	Begg Rock SMR	No Take	The MPA violations here are commercial and come from experienced	No change	Yes						
Santa Barbara and Ventura (Santa Barbara Channel)	Santa Barbara Island SFMR	No Take	Osborne Bank. CPFV/commercial lobster poaching. Overlapping jurisdictions	Have state discuss with NMS changing federal area to FMCA to allow for take of pelagics	No	More data/justification needed	M2 radar needed to monitor remote MPA			Take Allowance Change	Yes, would turn federal MRs into federal MCAs. No consensus
Los Angeles (Mainland)	Point Dume SMCA	Rec take by spearfishing of white seabass and pelagic finfish. Commercial take of swordfish by harpoon and coastal pelagic species by round haul net, brail gear, and light boat. Santa Ynez band exempt	Frequent noncompliance with MPAs and limited enforcement	Delete allowance for commercial take of Swordfish by harpoon	Yes	Swordfish fishing does not occur that close to shore	Additional enforcement personnel/efforts are needed	State Parks pending review; Heal the Bay		Take Allowance Change	
Los Angeles (Mainland)	Point Dume SMCA	Rec take by spearfishing of white seabass and pelagic finfish. Commercial take of swordfish by harpoon and coastal pelagic species by round haul net, brail gear, and light boat. Santa Ynez band exempt		Allow hook and line fishing for allowed method of take of white seabass and pelagic finfish	No	Lessening of protection/unclear impacts				Take Allowance Change	
Los Angeles (Mainland)	Point Dume SMR	No Take	Angle of eastern boundary is confusing/extends due west and is close to shore	No change	Yes		Use of surveyed boundary images in outreach can help address confusion with eastern boundary at Paradise Cove				
Los Angeles (Mainland)	Point Vicente No-Take SMCA	No Take	Frequent noncompliance with MPAs and limited enforcement	No change	Yes		Additional enforcement personnel/efforts are needed				
Los Angeles (Mainland)	Point Vicente No-Take SMCA	No Take	Confusion of significance of purple designation	Keep allowance for maintenance but change color from purple to red for ease of public interpretation	Yes	Easier to explain "no take" if consistent with red SMR				Other	

Los Angeles (Mainland)	Abalone Cove SMCA	Rec take by spearfishing of white seabass and pelagic finfish; and market squid by hand-held dip net. Commercial take of swordfish by harpoon and coastal pelagic species by round haul net, brail gear, and light boat	Harmful tidepooling impacts/take from tidepools. Frequent noncompliance with MPAs and limited enforcement	Delete allowance for commercial take of swordfish by harpoon	Yes	Swordfish fishing does not occur that close to shore	Additional enforcement personnel/efforts are needed	Heal the Bay		Take Allowance Change	
Los Angeles (Mainland)	Abalone Cove SMCA	Rec take by spearfishing of white seabass and pelagic finfish; and market squid by hand-held dip net. Commercial take of swordfish by harpoon and coastal pelagic species by round haul net, brail gear, and light boat		Allow hook and line fishing for allowed method of take of white seabass and pelagic finfish	No	Lessening of protection/unclear impacts				Take Allowance Change	
Los Angeles (Catalina Island)	Arrow Point to Lion Head Point SMCA	All rec and commercial take allowed. Take of invertebrates prohibited	Poaching lobster and abalone. Hoop nets. Difficult to identify 1,000 feet from shore at Indian/Endemic Rock	No change	Yes		Need for a locally managed (research) buoy to mark 1,000 feet point				
Los Angeles (Catalina Island)	Blue Cavern Onshore No-Take SMCA	No Take. No anchor area in original refuge boundaries	Fishing/using hoop nets close to shore at Big Fisherman Cove. Poaching at Yellowtail Point and Bird Rock; Confusion around no anchor zone	Change purple to red for outreach purposes	Yes, only if all current maintenance/access activities are still allowed	Easier to explain "no take" if consistent with red SMR	Need for some boundary marker at Yellowtail Point. MPA Watch transect would help identify use/ compliance issues here			Other	
Los Angeles (Catalina Island)	Blue Cavern Offshore SMCA	Rec take of pelagic finfish by hook and line and spearfishing and white seabass by spearfishing and market squid by hand held dip net. Commercial take of pelagic finfish by hook and line and swordfish by harpoon	Take via illegal gear types	No change	Yes						
Los Angeles (Catalina Island)	Long Point SMR	No Take	Trolling through MPA occurs. Misconception that MPA is only close to shore. Rental boats go past Long Point and fish	Make a distance from shore rather than lat/long for ease of outreach. Cut off corner and flip and move west (offshore) to maintain size	Yes	Clearer outreach to trollers to stay certain distance from shore, IF maintains size				Boundary Change	
Los Angeles (Catalina Island)	Lover's Cove SMCA	Rec take by hook and line from the Cabrillo Mole is allowed. Feeding fish allowed	Fishing from shore at the ramp near the Mole. Angle is difficult at eastern boundary. Food torpedoes are shot from tourist subs to attract fish to windows	Remove allowance for feeding of fish	Yes	Against intent of MLPA, affecting behavior of fish/habitat; public safety issue as fish become more aggressive and bite				Allowed Activity Change	
Los Angeles (Catalina Island)	Casino Point No-Take SMCA	No Take. Feeding fish allowed	Boundaries don't match dive park buoys. Feeding fish may be incompatible use. 40-50' depth at MPA line.	Remove allowance for feeding of fish.	Yes	Against intent of MLPA, affecting behavior of fish/habitat; public safety issue as fish become more aggressive and bite	Might need to utilize a weaning off process for fish used to being fed			Allowed Activity Change	

Los Angeles (Catalina Island)	Casino Point No-Take SMCA	No Take. Feeding fish allowed		Change purple to red for outreach purposes for outreach	Yes	Easier to explain "no take" if consistent with red SMR				Other	
Los Angeles (Catalina Island)	Farnsworth Onshore SMCA	Rec take by spearfishing of white seabass and pelagic finfish; marline, tunas and dorado by trolling and market squid by hand held dip net. Commercial take of swordfish by harpoon, coastal pelagics by roundhaul net, brail gear and light boat	More difficult to assess whether poaching is occurring on the backside. Challenging/confusing for fishers	No change	Yes		More outreach to fishers needed on why deep habitat/fish are protected here				
Los Angeles (Catalina Island)	Farnsworth Offshore SMCA	Rec take of pelagic finfish by hook and line or by spearfishing; white seabass by spearfishing; marlin, tunas and dorado by trolling and market squid by hand held dip net. Commercial take of swordfish by harpoon, coastal pelagics by roundhaul net, brail gear and light boat	CPFVs (party boats) are seen illegally fishing in Farnsworth Offshore SMCA, moving out if they see the CDFW patrol boat approaching. Regs restricting take of rockfish can be confusing for fishers/challenging to prove rockfish on board was taken outside	No change	Yes						
Los Angeles (Catalina Island)	Cat Harbor SMCA	Rec take of finfish by hook and line or by spearfishing, market squid by hook and line, and spiny lobster and sea urchin. Commercial take of sea cucumbers by diving only and spiny lobster and sea urchin. Aquaculture of finfish	Some take of undersized fish	No change	Yes						
Orange	Bolsa Bay SMCA	Rec take of finfish by hook and line from shore in designated areas only	Confusion between Bolsa Bay and Bolsa Chica Basin MPAs	Potentially combine Bolsa Bay with Bolsa Chica Basin MPAs?	No	State Lands requirement to have fishing				Boundary Change	Yes, would change from SMCA to SMR. No consensus
Orange	Bolsa Chica Basin No-Take SMCA	No Take. Allows for maintenance of artificial structures	Water management infrastructure is failing - needs management and repairs. Shoaling and potential closing of inlet - need cost effective alternative to dredging and $ to implement. Could ultimately change boundaries of MPAs	MPA should cover all waters in ecological reserve. Move northeastern boundary to Graham	Yes	Makes enforcement easier so CDFW can cite for unlawful fishing using 632 instead of no trespassing		OC Coastkeeper	Wendy Berube	Boundary Change	
Orange	Bolsa Chica Basin No-Take SMCA	No Take. Allows for maintenance of artificial structures	Confusion between Bolsa Bay and Bolsa Chica Basin MPA regulations and whether take is allowed. Bridge inconsistency	Change purple to red for outreach purposes	Yes	Easier to explain "no take" if consistent with red SMR		OC Coastkeeper	Wendy Berube	Other	

Orange	Upper Newport Bay SMCA	Rec take of finfish by hook and line from shore in designated areas only	Ecological Reserve and MPA overlapping jurisdiction. Fishing from floats by PCH bridge and using gill nets at Jamboree	No change	Yes		Harbor and estuary signs needed at Newport Dunes. Additional enforcement personnel/efforts are needed				
Orange	Crystal Cove SMCA	Rec take of finfish by hook and line or by spearfishing and spiny lobster and sea urchin. Commercial take of sea urchin, spiny lobster by trap, and coastal pelagic species by round haul net, brail gear and light boat	Harmful tidepooling and undersized lobster. Nighttime poaching. Angle is difficult at southern boundary	Better define tidepool definition to encompass rocky intertidal habitat	Yes	"Area encompassing the rocky pools" is confusing, makes it sounds like it is only the pools, not intertidal zone when dry	Night vision for State Parks officers to address nighttime poaching	State Parks pending review; OC Coastkeeper	Wendy Berube	Language Change	
Orange	Crystal Cove SMCA	Rec take of finfish by hook and line or by spearfishing and spiny lobster and sea urchin. Commercial take of sea urchin, spiny lobster by trap, and coastal pelagic species by round haul net, brail gear and light boat		Add "non-living, geological or cultural" marine resource to tidepool take prohibition for consistency with 632(a)1(C)	Yes	Clarifies tidepool protections to include rocks and shells		State Parks pending review; OC Coastkeeper	Wendy Berube	Language Change	
Orange	Laguna Beach SMR	No Take	Poaching in gated/private communities; angle is difficult at northern boundary	No change	Yes		More enforcement needed in private community. Bring back community scientist/anglers (i.e., CCFRP) to OC				
Orange	Laguna Beach No-Take SMCA	No Take. Maintenance allowed	Angle is difficult at southern boundary	Change purple to red for outreach purposes	Yes	Easier to explain "no take" if consistent with red SMR	Produce map that has layer that shows allowed maintenance/artificial structures and scientific take	OC Coastkeeper	Wendy Berube	Other	
Orange	Dana Point SMCA	Rec take of finfish by hook and line or by spearfishing and spiny lobster and sea urchin. Commercial take of sea urchin, spiny lobster by trap, and coastal pelagic species by round haul net, brail gear and light boat. Tidepools protected	Fishing without a license. Night poaching at 3 Arch. Take of limpets at north end. Shift in fishing pressure. Angle is difficult at southern boundary. Harmful tidepooling	Add "non-living, geological or cultural" marine resource to tidepool take prohibition for consistency with 632(a)1(C)	Yes	Clarifies tidepool protections to include rocks and shells		OC Coastkeeper	Wendy Berube	Language Change	
Orange	Dana Point SMCA	Rec take of finfish by hook and line or by spearfishing and spiny lobster and sea urchin. Commercial take of sea urchin, spiny lobster by trap, and coastal pelagic species by round haul net, brail gear and light boat. Tidepools protected		Better define tidepool definition to encompass rocky intertidal habitat or utilize a different term.	Yes	Tidepools are specific to pools but intertidal habitats protected can be free of pools in some cases. "Area encompassing the rocky pools" is unclear whether all rocky intertidal habitat is included here.		OC Coastkeeper	Wendy Berube	Language Change	
San Diego	Batiquitos Lagoon No-Take SMCA	No take. Boating, swimming, wading and diving prohibited	Confusion between ecological reserve regulations west of 5 and MPA regulations east of 5	Expand SMCA west of I-5 bridge to encompass all of ecological reserve	No	Expands MPA size, unclear on impacts to recreational fishing				Boundary Change	

San Diego	Batiquitos Lagoon No-Take SMCA	No take. Boating, swimming, wading and diving prohibited		Change to blue SMCA with designated fishing areas	Maybe	If does not reduce fishing opportunities under I-5 and 101 bridges, or lessen existing protections				Take Allowance Change	Yes, would change from No-Take SMCA to SMCA
San Diego	Batiquitos Lagoon No-Take SMCA	No take. Boating, swimming, wading and diving prohibited		Change purple to red for outreach purposes if boundaries remain the same	Yes	Easier to explain "no take" if consistent with red SMR				Other	
San Diego	Swami's SMCA	Rec take by hook and line from shore and rec take by spearfishing of white seabass and pelagic finfish	Harmful tidepooling, especially at Seaside reef. Enforcement for take of lobster is hard at southern boundary since it splits 2 jurisdictions and the reef (hard to know where they are actually taking from and who is responsible for enforcing what.)	Move southern boundary to jurisdictional boundary between State Parks and City of Solana Beach for full tidepool protection of reef	No	Increases size of MPA, reducing fishing access, and may impact take of halibut				Boundary Change	
San Diego	Swami's SMCA	Rec take by hook and line from shore and rec take by spearfishing of white seabass and pelagic finfish		Shift entire shape south (lifeguard tower to state/Solana Beach line to cover tidepool on south side)	Yes	Compromise. Keeps same size MPA but covers impacted tidepool area on southern boundary. Lifeguard tower clear boundary at north end		State Parks pending review; Wildcoast		Boundary Change	
San Diego	San Elijo Lagoon No Take SMCA	No take. Boating, swimming, wading and diving prohibited	Lots of people fishing at entrance to San Elijo lagoon under bridge and in channel	Move boundary to west side of the bridge (prohibiting fishing under the bridge) as long as accommodations are allowed for dredging	Yes	Signs are currently posted on west side of bridge to prohibit people from entering the San Elijo Lagoon. Makes outreach clearer		State Parks pending review; Wildcoast		Boundary Change	
San Diego	San Elijo Lagoon No Take SMCA	No take. Boating, swimming, wading and diving prohibited		Change purple to red for outreach purposes	Yes	Easier to explain "no take" if consistent with red SMR				Other	
San Diego	San Dieguito Lagoon SMCA	Rec take of finfish by hook and line from shore. Boating, swimming, wading and diving prohibited	Confusion between ecological reserve boundaries and regulations and MPA boundaries and regulations. Speculation that extent of water has changed since restoration. Original intent of 632 was to align with 630 in overlapping waters. Non-MPA areas are more restrictive which leads to confusion	Have MPA cover all water within ecological reserve.	Need more information	Check with Joint Power authority because would lessen protections if SMCA (that allows fishing) is expanded to all state waters	Sea level rise impacts should be considered			Boundary Change	
San Diego	San Diego-Scripps Coastal SMCA	Rec take of coastal pelagic species, except market squid, by hook and line only	Harmful tidepooling. People using gear types for fishing for species other than coastal pelagics but gear type cannot assume intent. Makes enforcement difficult. Also safety concerns with surf casters into high use swim/surf area	Add, "except from shore" to prohibit surf hook and line	Yes	Surf fishing from shore causes safety concerns (hooks getting caught on surfers/swimmers). Still allows kayakers to fish for bait fish on way out, which was original intent				Take Allowance Change	

San Diego	Matlahuayl SMR	No Take	Harmful tidepooling. Kayak fishing. Caves are being defaced/ graffitied	Add place name (La Jolla) to traditional Kumeyaay name (Matlahuayl)	No	Keep Kumeyaay name only for Tribal acknowledgement. Would also add confusion between other La Jolla MPAs	More focused patrols on caves in La Jolla to address littering/defacement of MPA			Language Change	
San Diego	South La Jolla SMR	No Take	Most highly cited MPA. Poaching of lobster and offshore fishing. Harmful tidepooling. Challenges of parking and access (coastline related challenges due to sea level rise, climate disturbance)	No change	Yes	Focus on local management/outreach/enforcement	Need for more focus on tidepools (outreach/ enforcement). More staff for allied agencies to help enforce. Encourage city to maintain safe accessways and deal with coastal erosion problems. More education on marine mammal disturbance				
San Diego	South La Jolla SMCA	Rec take of pelagic finfish by hook and line only		No change	Yes						
San Diego	Famosa Slough No Take SMCA	No Take	Homeless encampments. Construction run-off. Dogs and cats disturbing birds	Change purple to red for outreach purposes	Yes	Easier to explain “no take” if consistent with red SMR				Other	
San Diego	Cabrillo SMR	No Take	Harmful tidepooling. Offshore boats but NPS unable to contact other than through megaphone	Work with Kumeyaay to rename MPA to traditional Kumeyaay name	Yes	Kumeyaay name exists for this location. Need to confirm spelling	Additional enforcement personnel/efforts are needed			Language Change	
San Diego	Tijuana River Estuary SMCA	Rec take of coastal pelagic species, except market squid, by hand held dip net. Commercial take of coastal pelagics, except market squid by round haul net	Difficult take regulations to interpret in the field and take by hand held dip net not really occurring, per Imperial Beach lifeguards	No change							

Cell: K138
Note: was not sure about this categorization
MPA Collaborative

From: Devin O'Dea <[redacted]>
Sent: Thursday, February 1, 2024 04:10 PM
To: FGC <FGC@fgc.ca.gov>
Cc: Mark Smith <[redacted]>; Wayne Kotow <[redacted]>; Keely Hopkins <[redacted]>; California Chapter <[redacted]>
Subject: Discussion Item 10 - Regulation change petitions (marine)

Dear Commission Staff,

Please accept the attached comment letter on behalf of Backcountry Hunters & Anglers, the Coastal Conservation Association of California, and the Congressional Sportsman's Foundation pertaining to Discussion Item 10 at the upcoming Fish & Game Commission meeting.

Thank you,

Devin O'Dea | Western Policy & Conservation Manager
Backcountry Hunters & Anglers
Phone: (415) 246-5329
www.backcountryhunters.org

February 1, 2024

California Fish and Game Commission
715 P Street, 16th Floor,
Sacramento, CA 95814

RE: Discussion Item 10 - Regulation change petitions (marine)

Dear President Sklar, Vice President Zavaleta & Commissioners,

We appreciate the opportunity to comment on the numerous petitions under consideration at the February meeting of the California Fish & Game Commission, and we offer the perspective of the many hundred thousand supporters of our organizations to the Commission. We express grave concerns regarding several of the proposals to eliminate fishing access along large stretches of the California coast and argue that many of the petitions lack adequate scientific support and documentation to substantiate their positions.

The Decadal Management Review (DMR) of the Marine Protected Area Network (MPA) has offered important insights for MPA managers to help shape the adaptive management of MPA regulations, including promising research that MPAs may increase biomass and provide resiliency against the impacts of a changing climate for some species. The intent of the Marine Life Protection Act (MLPA) and the stewardship of our coastal resources are of paramount importance to California's heritage. However, these laudable goals and conservation benchmarks should not preclude access to harvest coastal foods where state and federal fisheries managers have demonstrated robust and resilient fish stocks without any current threat of overfishing, nor for those species where targeted fishing and active management would benefit the overall ecosystem balance.

There are numerous, seemingly well-intentioned petitions currently before the Fish & Game Commission that seek to preserve California's coastal waters citing anthropogenic impacts to biodiversity and ecosystems such as pollution, rising sea temperatures, disease, development and overfishing. While we support the intent to safeguard our fish stocks, biodiversity, and ecosystem integrity, we strongly disagree with the all-or-nothing approach adopted by many of the petitioners who proffer the wholesale elimination of fishing access without adequate scientific rationale or the acknowledgement of regulatory mechanisms already in place such as those established by the Magnuson-Stevens Fishery Conservation and Management Act working through the Pacific Fisheries Management Council, National Oceanic and Atmospheric Administration (NOAA) Fisheries, the California Department of Fish and Wildlife (CDFW), the Fish & Game Commission, and the additional state/federal laws and agencies dedicated to this task. Simply put, many of the petitions referenced below seek to advance preservation at all costs, pushing for wholesale closures that circumvent the regulatory processes already in place, ultimately bludgeoning access for the diverse angling communities that have revered these coastal traditions for generations.

Anglers and consumptive users will often be the first and loudest voices to advocate for restrictions or even closures to ensure the sustainability of a fishery, as evidenced by the numerous fishing groups and organizations advocating for the closure of the 2023 salmon season following the data and dismal projections provided by the Pacific Fisheries Management Council and CDFW. However, a Californian

constitutional right to fish seems to stand in conflict with the presumption that restriction of access is permissible where there is a lack of scientific evidence or data to justify the closure. Section 1, Article 25 of the California Constitution states, "the people shall have the right to fish upon and from the public lands of the State and in the waters thereof," and the courts in re Quinn (1973) defined "public lands of the state" referenced in this article to include "access to fish in the inland streams and coastal waters of the state."

Shore fishing, diving/spearfishing, kayak/boat fishing and coastal gathering are low impact activities that reflect the broad spectrum of California's diverse community and constitute a valuable resource for individuals across the economic divide to access nature and provide food for their families. We encourage the Commission and MPA managers to consider the numerous communities that enjoy the state's many sustainable food resources when considering protections and recommendations that might unnecessarily exclude these groups. We feel that these considerations are in line with the California Natural Resources Agency's Outdoors for All initiative and its commitment in the Pathways to 30x30 document to "implement projects that do no further harm or pose unintended consequences to historically marginalized communities."[1] Specifically, we wish to highlight this issue with regards to the expansion of California's MPA network which restricts shore-based diving, foraging, and fishing access for all Californians – especially historically marginalized communities, communities of color and Native American tribes. From California's Constitutional Right to Fish:

> Anglers from historically marginalized communities may be less able to travel to fishing locations and are more likely to require shore access, as opposed to access from a boat. Anglers in communities like this need accessible shore-fishing, particularly given the importance of subsistence fishing in poorer communities. Moreover, fishing opportunities offer physical and psychological benefits to disadvantaged communities, not just access to fish as food.[2]

It is within this context that we urge the Commission to take the following actions with regards to the petitions they have received.

Petition 2023-14MPA: *Allow commercial take of red sea urchins in nine state marine conservation areas (SMCAs)*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-15MPA: *Reclassify three northern Channel Islands state marine reserves (SMRs) to SMCAs and allow take of highly migratory species, pelagic finfish, and/or coastal pelagic finfish*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation, but are encouraged by the proposal and the potential opportunity to gather more data on limited take MPAs and long-term MPA monitoring at the Channels Islands.

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[1] https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/30-by-30/Final_Pathwaysto30x30_042022_508.pdf

[2] Coats, Francis, and Karrigan Bork. "CALIFORNIA'S CONSTITUTIONAL RIGHT TO FISH." *Environmental Law*, vol. 51, no. 4, 2021, pp. 1085–147. *JSTOR*, https://www.jstor.org/stable/48647570. Accessed 22 Mar. 2023.

Petition 2023-16MPA: *Reclassify Stewarts Point and Bodega Head SMRs to SMCAs and allow commercial take of salmon.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-18MPA: *Modify allowed uses for four marine protected areas (MPAs) in Santa Barbara Channel and eliminate two special closures.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-19MPA: *Designate new "Chitqawi" SMCA near Morro Bay for California-Chumash co-management*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-20MPA: *Reclassify and rename Point Buchon SMR to "Chumash SMCA" for co-management with tribal take exemption.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-21MPA: *Modify Pyramid Point SMCA to remove recreational take of surf smelt and allow tribal take exemption for Tolowa Dee-ni' Nation.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-22MPA: *Define "rocky intertidal zone," add research, monitoring, restoration and education allowance, and clarify protections in several Orange County MPAs.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-23MPA*: Reclassify three SMCAs to SMRs, designate one new SMR in Monterey, and make various changes related to kelp restoration.*

We recommend the Commission deny this petition.

While the petitioner's intent to restore kelp forests and ecosystem integrity at tankers reef and in the surrounding waters is laudable, this broadly proscriptive petition would unnecessarily restrict access for anglers where there is no clear scientific rationale. In fact, the petitioner submitted a very similar petition seeking to close access for groundfish along a large stretch of the coast in this region in 2023 which the Department of Fish & Wildlife rejected citing a lack of scientific evidence to support the claim. We support the ongoing efforts to restore kelp forests through urchin culling and other means, however we oppose reclassifying these SMCAs to SMRs and the establishment of a new SMR in Monterey.

Petition 2023-24MPA: *Expand Laguna Beach no-take SMCA southward to border of City of Laguna Beach and modify Dana Point SMCA boundaries*

We recommend the Commission deny this petition.

We oppose this petition on the basis that it lacks scientific documentation or justification to eliminate fishing access in the proposed area. The petitioner argues primarily for administrative ease that the no-take closure be extended to the edge of city limits. During the implementation of the MLPA, MPAs were sited utilizing careful selection criteria based on habitat type, proximity from other MPAs, impact to communities and more. The petitioner argues that all beaches within the City of Laguna Beach should be no-take MPAs in order to streamline enforcement and that homeowners "feel that it is not equitable to have only the north and central beaches protected." It should be noted that the petitioner also states clearly in the Economic or Fiscal Impact section of the petition that "estimated resident property values gain an increase of 20% from proximity to a fully protected MPA" which may explain more robust support from the city and homeowners.

The petitioner also cites kelp forest health as justification for eliminating fishing access, however the 100 + page report included with the petition doesn't reference fishing pressure or boat activity with regards to kelp forest health and instead focuses on water temperature, nutrients, wave height, upwelling, rainfall and other stressors. As such, we recommend the Commission deny this petition since there is no scientific documentation to support its claims, and it would only negatively impact anglers who would be forced to travel further to reach fishing grounds.

Petition 2023-27MPA: *Reclassify a portion or all of Anacapa SMCA to an SMR to protect eelgrass*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation. We recognize the value of eelgrass beds for overall ecosystem health and habitat; however, it should be noted that many recreational anglers who target pelagic fish do not anchor and instead prefer to drift fish or troll instead which would have zero impact on the bottom habitat and eelgrass.

Petition 2023-28MPA: *Designate a new SMR at Point Sal, or designate as an SMCA with a tribal take exemption based on tribal consultation*

We recommend the Commission deny this petition.

While the petitioner takes time to identify the important habitat types, larval transport zones, and cultural significance of the Point Sal area, and they reference potential threats to the region from coastal development and industry, they fail to elaborate in any substantive way why fishing access should be removed from this wild and iconic central coast fishing destination. The petitioner states: "current [commercial] fishing in the proposed area is limited, likely due to its considerable distance from nearest port areas of Morro Bay and Santa Barbara." They also admit that they have no data or analysis with regards to recreational fishing and state, "our request to CDFW for recreational fishing data from this area was being processed at time of submission; we will evaluate the potential impact to recreational fishers and submit it to the state following receipt of the requested data."

A limited google search of "Point Sal fishing" also uncovers a large number of recreational fishing blogs and videos detailing the remote and adventurous hike to fish this area from a diverse population of anglers. In 2023 one blogger wrote, "had a great time hiking miles and miles and miles to fish Point Sal with Martin Mansera from Mansera Outdoors…It's such a remote location and so difficult to access, it

makes for a really rad adventure." Recreational fishing trips to the area by boat are also common, and fishing is noted in nearly every travel guide or city/county website that talks about visiting Point Sal.

Regarding access and disadvantaged communities, the petitioner writes, "the California Environmental Protection Agency identifies the adjacent city of Guadalupe as "disadvantaged" under CA Senate Bill 535, and their synthesis of environmental and socioeconomic indicators further reveals that Guadalupe – alongside Santa Maria and Lompoc – are underprivileged communities that experience significant cumulative impacts from pollution. Given these communities' close proximity to Point Sal, implementing an SMR at the proposed site could enhance access for disadvantaged populations to valuable coastal resources and fishing opportunities."

To justify this confounding claim that removing fishing access could somehow *enhance fishing opportunities* for disadvantaged communities, the petitioner cites a study of commercial lobster fishing and the concept of "spillover." They write, "California's MPAs have been shown to increase the biomass of fishery-targeted species and promote "spillover" into nearby coastal areas, benefitting nearby fishing grounds."

Spillover and the positive impacts to fisheries located in waters adjacent to MPAs are often referenced in association with the MPA network, and the limited, initial science has demonstrated some positive correlations with spillover of invertebrates like lobsters to adjacent fishing grounds in select study areas and commercial fishing for tuna in Hawaii. However, there remains an opportunity to further study this hypothesis and to promote scientific research that successfully documents spillover of targeted finfish across the MPA network in California. Some data from MPA monitoring along the Central California Coast indicated limited evidence of spillover from targeted finfish that were tagged and recaptured at a later point during the study period as evidenced from the Starr et al study: Variation in Responses of Fishes across Multiple Reserves within a Network of Marine Protected Areas in Temperate Waters:

> As of July 2014, a total of 251 individual tag recaptures have been reported (Table 8). Tagged fishes were recaptured by commercial and recreational hook-and-line fishermen, commercial trap fishermen, SCUBA divers, and during our fishing surveys. Of all the tagged fishes recapture and reported, 71% were recaptured in the same site and grid cell as they were released, and 22% of recaptured fishes were caught within the same site but outside the original grid cell where they were released. Only 18 fish, or 7% of the recaptured fishes, were recaptured beyond the boundaries of the MPA or REF site in which they were released. The mean net distance moved by eight of nine species recaptured was less than half the length of the MPAs we studied.[3]

While we do not seek to draw conclusions regarding the overall merits of spillover to adjacent fisheries from the results of one study, we do encourage additional research to evaluate the impacts that MPAs have on local fisheries and fisheries as a whole, especially within the context of varied siting and disparate habitat types evidenced across the MPA network. As the Forcada study indicated, "We conclude that spillover effects are not a universal consequence of siting MPAs in temperate waters and they are related to the distribution of habitats inside and around MPAs." (Forcada et al., 2009).

Due to the limited scientific understanding of spillover as it relates to the Marine Protected Area Network as a whole, especially with regards to finfish which would be the primary target of recreational shore and

[3] 4 Starr RM, Wendt DE, Barnes CL, Marks CI, Malone D, et al. (2015) Variation in Responses of Fishes across Multiple Reserves within a Network of Marine Protected Areas in Temperate Waters. PLOS ONE 10(3): e0118502. https://doi.org/10.1371/journal.pone.0118502

boat-based anglers at Point Sal, we disagree with the petitioner's logical assumptions and the argument as a whole. In fact, when considered in the context presented from the *Constitutional Right to Fish* article, the discussion is turned on its head entirely. "Anglers from historically marginalized communities may be less able to travel to fishing locations and are more likely to require shore access, as opposed to access from a boat. Anglers in communities like this need accessible shore-fishing, particularly given the importance of subsistence fishing in poorer communities."[4]

With the two large no-take SMRs located just South of this newly proposed MPA (Vandenberg SMR & Point Conception SMR) and Point Buchon to the North, it would seem the opportunities to fish and forage the coast for residents of Guadalupe, Lompoc and Santa Maria are already few and far between. In fact, in 2022 the City of Lompoc petitioned the Fish & Game Commission to allow for shore-fishing access along a ½ mile stretch of beach with in the Vandenberg SMR, citing a lack of access to historic fishing grounds for the local communities.

We share the petitioner's concerns regarding habitat disruption from off-shore energy production and the associated infrastructure, however, we note the likely establishment of the Chumash Heritage National Marine Sanctuary (CHNMS) designation which would effectively curtail any development or offshore energy production in this region. Planning for the CHNMS has included fishing access as a key component of the proposed designation.

As a result, we recommend the Commission deny this petition.

Petition 2023-29MPA: *Designate a new SMCA with a tribal take exemption for and co-management with Santa Ynez Band of Chumash Indians in Santa Barbara*

We recommend the Commission deny this petition.

We oppose the petitioner's request to designate a new, no-take SMCA in Carpinteria for several reasons. First, the petitioner argues that spacing and connectivity is a key concern in this location with the distance between the Campus Point and Point Dume SMCAs at 64 nautical miles (nm) instead of the recommended 54 nm to ensure ecological connectivity. When this request is examined within the broader context of MPA siting, it is clear that the target spacing between MPAs could be easily achieved by moving the Campus Point SMCA South or the Point Dume SMCA North, since both are located well-within the recommended 54nm from adjacent MPAs on either side.

Additionally, the petitioner cites the location as important nursery habitat for juvenile great white sharks as justification for establishing a no-take SMR. They write, "Research conducted in the Southern California Bight has found that fisheries bycatch is likely the main source of mortality for JWS." However, the article they cite to support this claim, John F. Benson et. al., discloses that for great white sharks they captured and tagged, "mortality risk was substantially greater off the coast of Baja, Mexico compared with California." Importantly, the research paper also states, "that incidental gillnet capture continues to be the primary source of mortality for juveniles. The lower mortality risk we documented in California waters suggests that full closure of gillnet fishing close to shore is a more effective management strategy than simply banning targeted fishing to reduce mortality risk due to bycatch." [5]

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[4] Coats, Francis, and Karrigan Bork. "CALIFORNIA'S CONSTITUTIONAL RIGHT TO FISH." *Environmental Law*, vol. 51, no. 4, 2021, pp. 1085–147. *JSTOR*, https://www.jstor.org/stable/48647570. Accessed 22 Mar. 2023.

[5] Benson JF, Jorgensen SJ, O'Sullivan JB, et al. Juvenile survival, competing risks, and spatial variation in mortality risk of a marine apex predator. *J Appl Ecol*. 2018; 55: 2888–2897. https://doi.org/10.1111/1365-2664.13158

As the petitioner is undoubtedly aware, gillnet fishing is banned in state waters and therefore the proposed MPA would have no impact on the gillnet fishery or likely the mortality risk to great white sharks.

The petitioner notes the location's popularity with recreational lobster divers and the likely opposition from stakeholders who would oppose the additional loss of access. The mortality risk to great white sharks from the recreational lobster fishery is zero, similar to the risk from spearfishing, yet the petitioner seeks to eliminate access entirely without providing any scientific rationale for the closure. As a result, we request that the Commission deny this petition.

Petition 2023-31MPA: *Reclassify Drakes Estero SMCA to an SMR and combine with Estero de Limantour SMR as a single SMR:*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation but encourage the Commission to maintain access for clamming unless there is a clear threat to the fishery or surrounding ecosystem.

It is worth noting that the National Park Service mentions in their comment letter that the area is now Congressionally Designated Wilderness and that "recreational take of shellfish appears to be very rare, [and] requires long kayak trips in wilderness area." Just because something is difficult doesn't mean it should be illegal.

Petition 2023-32MPA: *Reclassify Duxbury Reef SMCA as an SMR and expand northern and southern boundaries*

We recommend that the Commission deny or refer this petition to the Department of Fish & Wildlife for review and recommendation but emphasize maintaining fishing access for local communities at Duxbury Reef. The vast majority of complaints regarding Duxbury reef are related to enforcement and compliance, rather than a scientific justification for eliminating access. Shore fishing is an important past-time for the diverse communities that comprise the North Bay Area, and removing access to a popular fishing destination should not be justified simply based on the actions of a few bad apples.

Petition 2023-33MPA: *Expand the boundaries of five SMRs and one SMCA, and designate a new SMR off Pleasure Point, in Santa Cruz*

We recommend that this petition be denied or referred to the Department of Fish & Wildlife for review and recommendation due to its broad scope and complexity. The petitioner seeks to enhance protections for kelp forests, but does so with an overly broad brush. Rather than advocating for reducing fishing pressure for predators of kelp grazers, like lobster and sheepshead, the petition advocates for the closure of all fishing, including the harvest of grazer species like urchins that have been documented to decimate kelp forests.

The petitioner argues that eliminating fishing pressure within the proposed MPA areas would somehow bolster kelp populations, but the claim is not well documented by scientific research in this petition. A noteworthy case study, by comparison, is the ongoing Tanker's Reef kelp restoration project, where volunteers have been culling purple urchins within study plots and tracking kelp recovery within the study area and a control site nearby. The initial data for the last three years shows a clear correlation between the removal of purple urchins and kelp recovery in the study plot with no kelp recovery in the adjacent control where urchins were not removed. Fishing is permitted in the Tanker's reef area, however, in adjacent MPA's that have not permitted active restoration and where fishing is not allowed, urchin barons persist and kelp recovery remains minimal.

Kelp forest health and resiliency is a complex and multi-variable equation that can be impacted by numerous factors including water temperature, disease, pollution, algal blooms, wave energy, commercial harvest and more. We support efforts to restore kelp forests across the coast and recognize the role they play in the overall ecosystem health of fisheries, especially the abalone fishery that remains closed until 2026. We urge caution, however where broad fishing closures are enacted in the attempt to solve a problem that requires a more nuanced and carefully crafted multidisciplinary approach.

It should also be noted that the petitioner indicates support for recreational hook and line fishing and spearfishing as an acceptable alternative in several of the MPAs referenced in the petition.

Petition 2023-34MPA: *Reclassify Point Buchon SMCA to an SMR and modify take at Farnsworth Onshore and Offshore SMCAs to only allow recreational spearfishing.*

We recommend that the Commission deny this petition and we emphasize the substantial impacts to current fishing access. The petitioner argues that since the salmon season was closed in 2023 it will likely be closed in perpetuity, which would justify eliminating salmon and albacore fishing access at the Point Buchon SMCA. Salmon populations often decrease during drought years and can rebound with increased precipitation or water allocation as was the case in 2008 and 2009 when the fishery was closed and then reopened. We are cautiously optimistic that the salmon numbers will once again bounce back following the increased precipitation received over the past two years.

In the draft Pathways to 30x30 document, the CNRA writes: “It should be noted that limited-take State MPAs provide an excellent model for other jurisdictions looking to balance biodiversity conservation with sustainable well-managed commercial and recreational fishing.” We feel that reclassifying the Point Buchon SMCA as an SMR and eliminating fishing in this area would be inappropriate; however, we support any attempts to improve enforcement and compliance with existing regulations.

Furthermore, the proposal to modify take at Farnsworth Onshore and Offshore SMCAs would disproportionately impact a broad variety and collection of user groups who may not be physically able or inclined to spearfish. For this reason and the lack of concrete scientific data to justify the additional restrictions, we recommend the Commission deny this petition.

Sincerely,

Devin O’Dea
Western Policy & Conservation Manager
Backcountry Hunters & Anglers

Wayne Kotow
Executive Director
Coastal Conservation Association California

Keely Hopkins
Western States Manager
Congressional Sportsman’s Foundation

FGC@FGC

From: Vergara, Rob <rvergara@nrdc.org>
Sent: Thursday, February 1, 2024 5:10 PM
To: FGC
Cc: Suatoni, Lisa
Subject: Point Sal SMR Supplemental Materials
Attachments: Appendix A_Point Sal Letter_CDFW Fishing Data.pdf; Appendix B_Lobster_CDFW_Data_Request_231214.pdf; Point Sal SMR Supplemental Fishing Data Summary (1).pdf

Hello,

Attached to this email are supplemental materials associated with petition 2023-28MPA for the proposed Point Sal SMR. Please let me know if anything else is needed from our end on this matter.

Thank you for your time and consideration!
Rob

ROBERT VERGARA
Roger Arliner Young (RAY) Ocean Conservation Fellow
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER ST, FLOORS 20 & 21
SAN FRANCISCO, CA 94104
RVERGARA@NRDC.ORG
NRDC.ORG

February 1, 2024

Eric Sklar, President
California Fish and Game Commission
715 P Street, 16th Floor
Sacramento, CA 95814

Re: Supplemental Fishing Data Summary for 2023-28MPA

Dear President Sklar and Honorable Commissioners,

Thank you for receiving petition 2023-28MPA for regulatory changes to the Marine Protected Area (MPA) network. Petition 2023-28MPA proposes to designate a new State Marine Reserve (SMR) or a State Marine Conservation Area (SMCA) with exception for cultural and subsistence take by local Indigenous communities and/or Tribes around Point Sal in Santa Barbara County. Over the last few months, NRDC has obtained data from the California Department of Fish and Wildlife (CDFW) and utilized publicly available databases to better understand recreational and commercial fishing practices within the proposed MPA boundaries. This supplemental document summarizes our findings thus far.

According to data provided by the Marine Fisheries Data Explorer and by CDFW staff, very low levels of commercial fishing occur around Point Sal. The proposed Point Sal MPA accounts for 14% of California fishing block 631 and 11% of California fishing block 632. As stated in petition 2023-28MPA at the time of submission, annual landings reported from these blocks over a ten year period from 2012 to 2022 represent just 0.11% of total landings by weight, and 1.1% of total landings by value, reported for the Central Coast region over the same 10 year period.[1,2] Additional data received from CDFW staff after the petition's submission shows that an average of 49 fishers, 15 businesses, and 50 vessels use the area within these two fishing blocks per year.[3] In 2023, the latest year with data available, only 3 fishers, 3 businesses, and 3 vessels fished in block 631 and 28 fishers from 27 vessels representing 7 businesses fished in block 632. The majority of reported fishing activity took place within fishing block 632, of which the proposed MPA covers only 11% of area. In light of this data, we continue to believe the establishment of an SMR or SMCA in this area would have minimal economic impact to commercial fisheries.

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[1] We defined the Central Coast region as all fishing blocks from Point Año Nuevo to Point Conception: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=144496&inline
[2] California Department of Fish and Wildlife, "Marine Fisheries Data Explorer," database, MFDE, accessed November 21, 2023, https://wildlife.ca.gov/Conservation/Marine/Data-Management-Research/MFDE .
[3] See Appendix A provided by CDFW on February 1, 2024.

The limited recreational fishing data available[4] shows similarly low levels of recreational fishing taking place. Lobster Report Cards submitted over the last 10 years (2012-early 2023) report a total of only 123 lobster fishing trips and a total of 132 lobster retained from the area stretching between Surf Beach, Santa Barbara County up to the San Luis Obispo County line[5]. These very low numbers are unsurprising, as this species is primarily found in warmer waters, and Point Conception marks the northern limit of the California spiny lobster's core range (CDFW California Spiny Lobster Enhanced Status Report). We acknowledge that there are recreational fishing data limitations and encourage CDFW to do further analysis to supplement these findings.

For all the reasons stated above, we anticipate the proposed Point Sal SMR would create minimal displacement of commercial and recreational fishers. Thank you for the opportunity to weigh in on the adaptive management of California's MPA network.

Sincerely,

Dr. Lisa Suatoni
Deputy Director, Oceans
Natural Resources Defense Council

[4] While other recreational fishing data are available via the Recreational Fisheries Information Network (RecFIN) database, the spatial scale at which it is reported (combined Santa Barbara and Ventura County-level) was too large to be useful for this purpose.
[5] See Appendix B provided by CDFW on December 14, 2023.

Title: Fishers/Vessels/Businesses by Block and Year (2012-2023)

Summary

This table contains a summary of the distinct count of unique fisher IDs, unique business IDs, and unique vessel IDs with recorded landings within CDFW Commercial Fishing Blocks 631, 632, 651, and 665 separated by Year from 2012 through 2023.

Description

These data were extracted from the Marine Landings Database System (MLDS) using Microsoft Power BI. In order to meet requirements specified in FGC 8022, records that are confidential have been redacted (shown as NULL) from the summary output. The threshold for determining confidentiality is termed the "Rule-of-Three." All records provided must be the aggregate of at least three fishers, three vessels, and three businesses. The basis in summarizing California fisheries data using this method is to maintain confidentiality such that there is not disclosure of the proprietary business information from any individual. Individuals in this context refers to individual fishers, individual fishing vessels, and individual fish receiving businesses.

Attributes:

CDFW Block ID: CDFW Commercial Fishing Block ID number
Year: The year the records are summed from
Fisher Count: Distinct count of unique fisher IDs from commercial landings receipts
Business Count: Distinct count of unique business IDs from commercial landings receipts
Vessel Count: Distinct count of unique vessel IDs from commercial landings receipts

Credits

Georgia Martel, Environmental Scientist, Data Management Project, California Department of Fish and Wildlife

Disclaimer:

CDFW collects data from various sources for fisheries management purposes, and data may be modified at any time to improve accuracy and as new data are acquired. CDFW may provide data upon request under a formal agreement. Data are provided as-is and in good faith, but CDFW does not endorse any particular analytical methods, interpretations, or conclusions based upon the data it provides. Unless otherwise stated, use of CDFW's data does not constitute CDFW's professional advice or formal recommendation of any given analysis. CDFW recommends users consult with CDFW prior to data use regarding known limitations of certain data sets.

CDFW Block ID	Year	Fisher Count	Business Count	Vessel Count
631	2012	12	5	12
631	2013	11	9	12
631	2014	5	4	4
631	2015	15	6	14
631	2016	15	5	16
631	2017	10	4	9
631	2018	11	3	12
631	2019	NULL	NULL	NULL
631	2020	3	3	3
631	2021	5	5	6
631	2022	NULL	NULL	NULL
631	2023	3	3	3
632	2012	38	11	37
632	2013	39	10	42
632	2014	43	12	46
632	2015	54	21	55
632	2016	40	13	43
632	2017	43	6	46
632	2018	46	6	41
632	2019	56	11	54
632	2020	38	9	39
632	2021	27	10	32
632	2022	28	8	26
632	2023	28	7	27

Dataset Summary

This summary includes information from California Department of Fish and Wildlife (CDFW) Automated Licencing Database System (ALDS). Data have not undergone extensive QA/QC and may contain errors. Report card information is self-reported by the report card holder. The recreational fishing season for spiny lobster runs from the first Saturday preceding the first Wednesday of October (until the 2023-24 season) to the first Wednesday after March 15 of the following year.

Datafield Descriptions:

Field Name	***Field Type***	**Description**
DocumentNumber	Text	Unique number for each report card
Month	Number	Month as a number
Day	Number	Day as a number
LocCode	Number	Number of the location as listed at the end of the printed report card
GearCode	Number	Number of the gear type used where 1 = traditional hoopnet (lays flat), 2 = rigid hoop net, 3 = SCUBA diving, and 4 = free diving
LobsterRetained	Number	Number of lobsters kept by the report card holder. Cannot exceed 7.
Season/Year	Number	For the full season format report cards = the year the season started and the year the season ended. For the split season report cards = the calendar year the report card was valid for.
CardFormat	Text	

Dataset Processing Notes

Each row is one trip. There is not a 100% return rate on report cards, so the reported data do not represent every fishing trip. In 2013, report cards changed from being valid for a calendar year (i.e., split season) to being valid for an entire lobster season (which spans two calendar years).

QAQC Notes

A single person can purchase more than one report card
There may be dates that fall outside of the season; these are likely data errors.
There may be dates that fall outside of the season; these are likely data errors.

Report card holders do not record the year of their catch, only the month and day. To determine the year, look at the month relative to the season. For example, catch completed on January 10 during the 2014-2015 season would be January 10, 2015.

DocumentNumber	Month	Day	LocCode (91 = "Surf Beach up to SLO County Line")	GearCode	LobsterRetained	Season	CardFormat
D-0006109804-8	10	27	91	1	1.00	2012	Split Season
D-0006612635-9	10	5	91	4	0.00	2013	Split Season
D-0012156754-1	10	1	91	2	0.00	2014-15	Full Season
D-0012416045-3	1	3	91	1	0.00	2014-15	Full Season
D-0012416045-3	1	3	91	2	0.00	2014-15	Full Season
D-0012198921-3	9	30	91	1	0.00	2014-15	Full Season
D-0012053748-0	2	17	91	4	0.00	2014-15	Full Season
D-0012053748-0	2	18	91	4	0.00	2014-15	Full Season
D-0012053748-0	2	20	91	4	0.00	2014-15	Full Season
D-0012053748-0	2	24	91	4	0.00	2014-15	Full Season
D-0012053748-0	2	28	91	4	0.00	2014-15	Full Season
D-0012053748-0	3	2	91	4	0.00	2014-15	Full Season
D-0012053748-0	3	9	91	4	0.00	2014-15	Full Season
D-0012053748-0	3	15	91	4	0.00	2014-15	Full Season
D-0012053748-0	3	16	91	4	0.00	2014-15	Full Season
D-0012230662-2	3	1	91	3	7.00	2014-15	Full Season
D-0012149326-8	3	3	91	2	6.00	2014-15	Full Season
D-0012726828-6	1	2	91	2	0.00	2014-15	Full Season
D-0015431570-6	10	31	91	1	5.00	2015-16	Full Season
D-0015334022-0	10	31	91	1	7.00	2015-16	Full Season
D-0015408015-4	11	2	91	4	4.00	2015-16	Full Season
D-0015332100-5	10	31	91	1	6.00	2015-16	Full Season
D-0018338906-8	10	2	91	4	0.00	2016-17	Full Season
D-0018363695-1	10	4	91	1	0.00	2016-17	Full Season
D-0018298698-1	11	5	91	3	7.00	2016-17	Full Season
D-0018298698-1	11	6	91	3	6.00	2016-17	Full Season
D-0018298698-1	11	11	91	3	6.00	2016-17	Full Season
D-0018298698-1	11	12	91	3	5.00	2016-17	Full Season
D-0018298698-1	1	1	91	3	5.00	2016-17	Full Season
D-0018477500-2	12	12	91	1	1.00	2016-17	Full Season

DocumentNumber	Month	Day	LocCode (91 = "Surf Beach up to SLO County Line")	GearCode	LobsterRetained	Season	CardFormat
D-0021351533-3	9	30	91	3	3.00	2017-18	Full Season
D-0021391997-1	10	7	91	1	0.00	2017-18	Full Season
D-0021420340-6	9	30	91	2	1.00	2017-18	Full Season
D-0021386570-2	11	30	91	2	0.00	2017-18	Full Season
D-0021429495-6	10	3	91	2	0.00	2017-18	Full Season
D-0021429495-6	10	4	91	2	0.00	2017-18	Full Season
D-0021429495-6	10	5	91	2	NA	2017-18	Full Season
D-0024443916-3	11	11	91	1	0.00	2018-19	Full Season
D-0024436589-1	11	3	91	3	6.00	2018-19	Full Season
D-0024510000-2	10	6	91	1	0.00	2018-19	Full Season
D-0024510000-2	10	20	91	1	0.00	2018-19	Full Season
D-0024377281-4	9	29	91	2	0.00	2018-19	Full Season
D-0024377281-4	9	29	91	2	0.00	2018-19	Full Season
D-0024377281-4	9	29	91	2	0.00	2018-19	Full Season
D-0024377281-4	10	25	91	2	0.00	2018-19	Full Season
D-0024377281-4	11	4	91	2	0.00	2018-19	Full Season
D-0024477563-8	10	1	91	2	0.00	2018-19	Full Season
D-0024477563-8	10	2	91	2	0.00	2018-19	Full Season
D-0024477563-8	11	4	91	2	0.00	2018-19	Full Season
D-0024479256-9	10	3	91	2	0.00	2018-19	Full Season
D-0024479256-9	10	10	91	2	0.00	2018-19	Full Season
D-0024479256-9	10	19	91	2	0.00	2018-19	Full Season
D-0024479256-9	10	27	91	2	0.00	2018-19	Full Season
D-0024479256-9	10	28	91	2	0.00	2018-19	Full Season
D-0024785258-1	12	9	91	1	0.00	2018-19	Full Season
D-0027487523-8	11	13	91	2	1.00	2019-20	Full Season
D-0027772578-5	11	25	91	2	1.00	2019-20	Full Season
D-0027772580-8	11	25	91	2	2.00	2019-20	Full Season
D-0027772577-4	11	25	91	2	3.00	2019-20	Full Season
D-0027462675-9	10	10	91	2	0.00	2019-20	Full Season

DocumentNumber	Month	Day	LocCode (91 = "Surf Beach up to SLO County Line")	GearCode	LobsterRetained	Season	CardFormat
D-0027475729-3	11	6	91	4	0.00	2019-20	Full Season
D-0027410185-8	11	9	91	3	0.00	2019-20	Full Season
D-0027410185-8	11	10	91	3	1.00	2019-20	Full Season
D-0030786737-1	10	23	91	2	0.00	2020-21	Full Season
D-0030898140-3	10	23	91	2	0.00	2020-21	Full Season
D-0030898140-3	3	2	91	2	1.00	2020-21	Full Season
D-0030737141-6	11	20	91	3	1.00	2020-21	Full Season
D-0030737141-6	11	21	91	3	0.00	2020-21	Full Season
D-0030744104-3	10	17	91	2	5.00	2020-21	Full Season
D-0030744104-3	12	20	91	2	0.00	2020-21	Full Season
D-0030918790-7	11	3	91	2	0.00	2020-21	Full Season
D-0030637845-6	3	5	91	2	0.00	2020-21	Full Season
D-0030637845-6	3	5	91	1	0.00	2020-21	Full Season
D-0030759004-8	10	10	91	2	0.00	2020-21	Full Season
D-0030759004-8	11	8	91	2	0.00	2020-21	Full Season
D-0030758944-0	10	5	91	2	0.00	2020-21	Full Season
D-0030758944-0	10	10	91	2	1.00	2020-21	Full Season
D-0030758944-0	10	16	91	2	0.00	2020-21	Full Season
D-0034047025-5	11	8	91	2	0.00	2021-22	Full Season
D-0034047025-5	11	15	91	2	0.00	2021-22	Full Season
D-0034075126-8	10	19	91	1	0.00	2021-22	Full Season
D-0034052471-6	11	23	91	4	0.00	2021-22	Full Season
D-0034052471-6	12	7	91	4	0.00	2021-22	Full Season
D-0034052471-6	12	21	91	4	4.00	2021-22	Full Season
D-0034052471-6	12	30	91	4	1.00	2021-22	Full Season
D-0034052471-6	3	12	91	4	4.00	2021-22	Full Season
D-0034026720-4	12	22	91	4	4.00	2021-22	Full Season
D-0034537104-7	1	8	91	1	0.00	2021-22	Full Season
D-0034003380-1	11	8	91	2	0.00	2021-22	Full Season
D-0034003380-1	2	18	91	2	1.00	2021-22	Full Season

DocumentNumber	Month	Day	LocCode (91 = "Surf Beach up to SLO County Line")	GearCode	LobsterRetained	Season	CardFormat
D-0033969023-5	1	29	91	4	0.00	2021-22	Full Season
D-0033943000-2	1	29	91	4	7.00	2021-22	Full Season
D-0034003659-0	11	13	91	2	0.00	2021-22	Full Season
D-0034415287-4	3	9	91	4	2.00	2021-22	Full Season
D-0034415287-4	3	10	91	4	1.00	2021-22	Full Season
D-0036943000-5	12	18	91	4	1.00	2022-23	Full Season
D-0037022772-0	11	8	91	4	3.00	2022-23	Full Season
D-0037022772-0	10	25	91	4	3.00	2022-23	Full Season
D-0037022772-0	10	23	91	4	0.00	2022-23	Full Season
D-0037022772-0	3	8	91	4	0.00	2022-23	Full Season
D-0037022815-8	11	9	91	1	3.00	2022-23	Full Season
D-0037022815-8	12	22	91	1	0.00	2022-23	Full Season
D-0037022815-8	3	15	91	1	0.00	2022-23	Full Season
D-0036825453-6	10	19	91	4	0.00	2022-23	Full Season
D-0036825453-6	11	6	91	4	2.00	2022-23	Full Season
D-0036825453-6	11	9	91	4	4.00	2022-23	Full Season
D-0036825453-6	3	8	91	4	0.00	2022-23	Full Season
D-0036972626-1	3	8	91	2	0.00	2022-23	Full Season
D-0037329111-7	12	23	91	1	0.00	2022-23	Full Season
D-0037329111-7	12	23	91	2	0.00	2022-23	Full Season
D-0036944949-8	10	15	91	2	0.00	2022-23	Full Season
D-0036991957-9	10	7	91	4	0.00	2022-23	Full Season
D-0036997253-4	10	27	91	4	0.00	2022-23	Full Season
D-0036997253-4	12	21	91	4	1.00	2022-23	Full Season
D-0036997253-4	12	22	91	4	0.00	2022-23	Full Season
D-0037014276-0	10	9	91	4	1.00	2022-23	Full Season
D-0037014276-0	10	26	91	4	0.00	2022-23	Full Season
D-0037037636-5	11	7	91	2	0.00	2022-23	Full Season
D-0037037636-5	11	15	91	2	0.00	2022-23	Full Season
D-0037037616-3	11	7	91	2	0.00	2022-23	Full Season

DocumentNumber	Month	Day	LocCode (91 = "Surf Beach up to SLO County Line")	GearCode	LobsterRetained	Season	CardFormat
D-0036959730-2	11	20	91	4	0.00	2022-23	Full Season
D-0036988345-6	11	11	91	2	0.00	2022-23	Full Season

February 8, 2024

California Fish and Game Commission
715 P Street, 16th Floor,
Sacramento, CA 95814

RE: Discussion Item 10 - Regulation change petitions (marine)

Dear President Sklar, Vice President Zavaleta & Commissioners,

We appreciate the opportunity to comment on the numerous petitions under consideration at the February meeting of the California Fish & Game Commission, and we offer the perspective of the many hundred thousand supporters of our organizations to the Commission. We express grave concerns regarding several of the proposals to eliminate fishing access along large stretches of the California coast and argue that many of the petitions lack adequate scientific support and documentation to substantiate their positions.

The Decadal Management Review (DMR) of the Marine Protected Area Network (MPA) has offered important insights for MPA managers to help shape the adaptive management of MPA regulations, including promising research that MPAs may increase biomass and provide resiliency against the impacts of a changing climate for some species. The intent of the Marine Life Protection Act (MLPA) and the stewardship of our coastal resources are of paramount importance to California's heritage. However, these laudable goals and conservation benchmarks should not preclude access to harvest coastal foods where state and federal fisheries managers have demonstrated robust and resilient fish stocks without any current threat of overfishing, nor for those species where targeted fishing and active management would benefit the overall ecosystem balance.

There are numerous, seemingly well-intentioned petitions currently before the Fish & Game Commission that seek to preserve California's coastal waters citing anthropogenic impacts to biodiversity and ecosystems such as pollution, rising sea temperatures, disease, development and overfishing. While we support the intent to safeguard our fish stocks, biodiversity, and ecosystem integrity, we strongly disagree with the all-or-nothing approach adopted by many of the petitioners who proffer the wholesale elimination of fishing access without adequate scientific rationale or the acknowledgement of regulatory mechanisms already in place such as those established by the Magnuson-Stevens Fishery Conservation and Management Act working through the Pacific Fisheries Management Council, National Oceanic and Atmospheric Administration (NOAA) Fisheries, the California Department of Fish and Wildlife (CDFW), the Fish & Game Commission, and the additional state/federal laws and agencies dedicated to this task. Simply put, many of the petitions referenced below seek to advance preservation at all costs, pushing for wholesale closures that circumvent the regulatory processes already in place, ultimately bludgeoning access for the diverse angling communities that have revered these coastal traditions for generations.

Anglers and consumptive users will often be the first and loudest voices to advocate for restrictions or even closures to ensure the sustainability of a fishery, as evidenced by the numerous fishing groups and organizations advocating for the closure of the 2023 salmon season following the data and dismal projections provided by the Pacific Fisheries Management Council and CDFW. However, a Californian

constitutional right to fish seems to stand in conflict with the presumption that restriction of access is permissible where there is a lack of scientific evidence or data to justify the closure. Section 1, Article 25 of the California Constitution states, "the people shall have the right to fish upon and from the public lands of the State and in the waters thereof," and the courts in re Quinn (1973) defined "public lands of the state" referenced in this article to include "access to fish in the inland streams and coastal waters of the state."

Shore fishing, diving/spearfishing, kayak/boat fishing and coastal gathering are low impact activities that reflect the broad spectrum of California's diverse community and constitute a valuable resource for individuals across the economic divide to access nature and provide food for their families. We encourage the Commission and MPA managers to consider the numerous communities that enjoy the state's many sustainable food resources when considering protections and recommendations that might unnecessarily exclude these groups. We feel that these considerations are in line with the California Natural Resources Agency's Outdoors for All initiative and its commitment in the Pathways to 30x30 document to "implement projects that do no further harm or pose unintended consequences to historically marginalized communities."[1] Specifically, we wish to highlight this issue with regards to the expansion of California's MPA network which restricts shore-based diving, foraging, and fishing access for all Californians – especially historically marginalized communities, communities of color and Native American tribes. From California's Constitutional Right to Fish:

> Anglers from historically marginalized communities may be less able to travel to fishing locations and are more likely to require shore access, as opposed to access from a boat. Anglers in communities like this need accessible shore-fishing, particularly given the importance of subsistence fishing in poorer communities. Moreover, fishing opportunities offer physical and psychological benefits to disadvantaged communities, not just access to fish as food.[2]

It is within this context that we urge the Commission to take the following actions with regards to the petitions they have received.

Petition 2023-14MPA: *Allow commercial take of red sea urchins in nine state marine conservation areas (SMCAs)*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-15MPA: *Reclassify three northern Channel Islands state marine reserves (SMRs) to SMCAs and allow take of highly migratory species, pelagic finfish, and/or coastal pelagic finfish*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation, but are encouraged by the proposal and the potential opportunity to gather more data on limited take MPAs and long-term MPA monitoring at the Channels Islands.

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[1] https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/30-by-30/Final_Pathwaysto30x30_042022_508.pdf

[2] Coats, Francis, and Karrigan Bork. "CALIFORNIA'S CONSTITUTIONAL RIGHT TO FISH." *Environmental Law*, vol. 51, no. 4, 2021, pp. 1085–147. *JSTOR*, https://www.jstor.org/stable/48647570. Accessed 22 Mar. 2023.

Petition 2023-16MPA: *Reclassify Stewarts Point and Bodega Head SMRs to SMCAs and allow commercial take of salmon.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-18MPA: *Modify allowed uses for four marine protected areas (MPAs) in Santa Barbara Channel and eliminate two special closures.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-19MPA: *Designate new "Chitqawi" SMCA near Morro Bay for California-Chumash co-management*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-20MPA: *Reclassify and rename Point Buchon SMR to "Chumash SMCA" for co-management with tribal take exemption.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-21MPA: *Modify Pyramid Point SMCA to remove recreational take of surf smelt and allow tribal take exemption for Tolowa Dee-ni' Nation.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-22MPA: *Define "rocky intertidal zone," add research, monitoring, restoration and education allowance, and clarify protections in several Orange County MPAs.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-23MPA*: Reclassify three SMCAs to SMRs, designate one new SMR in Monterey, and make various changes related to kelp restoration.*

We recommend the Commission deny this petition.

While the petitioner's intent to restore kelp forests and ecosystem integrity at tankers reef and in the surrounding waters is laudable, this broadly proscriptive petition would unnecessarily restrict access for anglers where there is no clear scientific rationale. In fact, the petitioner submitted a very similar petition seeking to close access for groundfish along a large stretch of the coast in this region in 2023 which the Department of Fish & Wildlife rejected citing a lack of scientific evidence to support the claim. We support the ongoing efforts to restore kelp forests through urchin culling and other means, however we oppose reclassifying these SMCAs to SMRs and the establishment of a new SMR in Monterey.

Petition 2023-24MPA: *Expand Laguna Beach no-take SMCA southward to border of City of Laguna Beach and modify Dana Point SMCA boundaries*

We recommend the Commission deny this petition.

We oppose this petition on the basis that it lacks scientific documentation or justification to eliminate fishing access in the proposed area. The petitioner argues primarily for administrative ease that the no-take closure be extended to the edge of city limits. During the implementation of the MLPA, MPAs were sited utilizing careful selection criteria based on habitat type, proximity from other MPAs, impact to communities and more. The petitioner argues that all beaches within the City of Laguna Beach should be no-take MPAs in order to streamline enforcement and that homeowners "feel that it is not equitable to have only the north and central beaches protected." It should be noted that the petitioner also states clearly in the Economic or Fiscal Impact section of the petition that "estimated resident property values gain an increase of 20% from proximity to a fully protected MPA" which may explain more robust support from the city and homeowners.

The petitioner also cites kelp forest health as justification for eliminating fishing access, however the 100 + page report included with the petition doesn't reference fishing pressure or boat activity with regards to kelp forest health and instead focuses on water temperature, nutrients, wave height, upwelling, rainfall and other stressors. As such, we recommend the Commission deny this petition since there is no scientific documentation to support its claims, and it would only negatively impact anglers who would be forced to travel further to reach fishing grounds.

Petition 2023-27MPA: *Reclassify a portion or all of Anacapa SMCA to an SMR to protect eelgrass*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation. We recognize the value of eelgrass beds for overall ecosystem health and habitat; however, it should be noted that many recreational anglers who target pelagic fish do not anchor and instead prefer to drift fish or troll instead which would have zero impact on the bottom habitat and eelgrass.

Petition 2023-28MPA: *Designate a new SMR at Point Sal, or designate as an SMCA with a tribal take exemption based on tribal consultation*

We recommend the Commission deny this petition.

While the petitioner takes time to identify the important habitat types, larval transport zones, and cultural significance of the Point Sal area, and they reference potential threats to the region from coastal development and industry, they fail to elaborate in any substantive way why fishing access should be removed from this wild and iconic central coast fishing destination. The petitioner states: "current [commercial] fishing in the proposed area is limited, likely due to its considerable distance from nearest port areas of Morro Bay and Santa Barbara." They also admit that they have no data or analysis with regards to recreational fishing and state, "our request to CDFW for recreational fishing data from this area was being processed at time of submission; we will evaluate the potential impact to recreational fishers and submit it to the state following receipt of the requested data."

A limited google search of "Point Sal fishing" also uncovers a large number of recreational fishing blogs and videos detailing the remote and adventurous hike to fish this area from a diverse population of anglers. In 2023 one blogger wrote, "had a great time hiking miles and miles and miles to fish Point Sal with Martin Mansera from Mansera Outdoors…It's such a remote location and so difficult to access, it

makes for a really rad adventure." Recreational fishing trips to the area by boat are also common, and fishing is noted in nearly every travel guide or city/county website that talks about visiting Point Sal.

Regarding access and disadvantaged communities, the petitioner writes, "the California Environmental Protection Agency identifies the adjacent city of Guadalupe as "disadvantaged" under CA Senate Bill 535, and their synthesis of environmental and socioeconomic indicators further reveals that Guadalupe – alongside Santa Maria and Lompoc – are underprivileged communities that experience significant cumulative impacts from pollution. Given these communities' close proximity to Point Sal, implementing an SMR at the proposed site could enhance access for disadvantaged populations to valuable coastal resources and fishing opportunities."

To justify this confounding claim that removing fishing access could somehow *enhance fishing opportunities* for disadvantaged communities, the petitioner cites a study of commercial lobster fishing and the concept of "spillover." They write, "California's MPAs have been shown to increase the biomass of fishery-targeted species and promote "spillover" into nearby coastal areas, benefitting nearby fishing grounds."

Spillover and the positive impacts to fisheries located in waters adjacent to MPAs are often referenced in association with the MPA network, and the limited, initial science has demonstrated some positive correlations with spillover of invertebrates like lobsters to adjacent fishing grounds in select study areas and commercial fishing for tuna in Hawaii. However, there remains an opportunity to further study this hypothesis and to promote scientific research that successfully documents spillover of targeted finfish across the MPA network in California. Some data from MPA monitoring along the Central California Coast indicated limited evidence of spillover from targeted finfish that were tagged and recaptured at a later point during the study period as evidenced from the Starr et al study: Variation in Responses of Fishes across Multiple Reserves within a Network of Marine Protected Areas in Temperate Waters:

> As of July 2014, a total of 251 individual tag recaptures have been reported (Table 8). Tagged fishes were recaptured by commercial and recreational hook-and-line fishermen, commercial trap fishermen, SCUBA divers, and during our fishing surveys. Of all the tagged fishes recapture and reported, 71% were recaptured in the same site and grid cell as they were released, and 22% of recaptured fishes were caught within the same site but outside the original grid cell where they were released. Only 18 fish, or 7% of the recaptured fishes, were recaptured beyond the boundaries of the MPA or REF site in which they were released. The mean net distance moved by eight of nine species recaptured was less than half the length of the MPAs we studied.[3]

While we do not seek to draw conclusions regarding the overall merits of spillover to adjacent fisheries from the results of one study, we do encourage additional research to evaluate the impacts that MPAs have on local fisheries and fisheries as a whole, especially within the context of varied siting and disparate habitat types evidenced across the MPA network. As the Forcada study indicated, "We conclude that spillover effects are not a universal consequence of siting MPAs in temperate waters and they are related to the distribution of habitats inside and around MPAs." (Forcada et al., 2009).

Due to the limited scientific understanding of spillover as it relates to the Marine Protected Area Network as a whole, especially with regards to finfish which would be the primary target of recreational shore and

[3] 4 Starr RM, Wendt DE, Barnes CL, Marks CI, Malone D, et al. (2015) Variation in Responses of Fishes across Multiple Reserves within a Network of Marine Protected Areas in Temperate Waters. PLOS ONE 10(3): e0118502. https://doi.org/10.1371/journal.pone.0118502

boat-based anglers at Point Sal, we disagree with the petitioner's logical assumptions and the argument as a whole. In fact, when considered in the context presented from the *Constitutional Right to Fish* article, the discussion is turned on its head entirely. "Anglers from historically marginalized communities may be less able to travel to fishing locations and are more likely to require shore access, as opposed to access from a boat. Anglers in communities like this need accessible shore-fishing, particularly given the importance of subsistence fishing in poorer communities."[4]

With the two large no-take SMRs located just South of this newly proposed MPA (Vandenberg SMR & Point Conception SMR) and Point Buchon to the North, it would seem the opportunities to fish and forage the coast for residents of Guadalupe, Lompoc and Santa Maria are already few and far between. In fact, in 2022 the City of Lompoc petitioned the Fish & Game Commission to allow for shore-fishing access along a ½ mile stretch of beach with in the Vandenberg SMR, citing a lack of access to historic fishing grounds for the local communities.

We share the petitioner's concerns regarding habitat disruption from off-shore energy production and the associated infrastructure, however, we note the likely establishment of the Chumash Heritage National Marine Sanctuary (CHNMS) designation which would effectively curtail any development or offshore energy production in this region. Planning for the CHNMS has included fishing access as a key component of the proposed designation.

As a result, we recommend the Commission deny this petition.

Petition 2023-29MPA: *Designate a new SMCA with a tribal take exemption for and co-management with Santa Ynez Band of Chumash Indians in Santa Barbara*

We recommend the Commission deny this petition.

We oppose the petitioner's request to designate a new, no-take SMCA in Carpinteria for several reasons. First, the petitioner argues that spacing and connectivity is a key concern in this location with the distance between the Campus Point and Point Dume SMCAs at 64 nautical miles (nm) instead of the recommended 54 nm to ensure ecological connectivity. When this request is examined within the broader context of MPA siting, it is clear that the target spacing between MPAs could be easily achieved by moving the Campus Point SMCA South or the Point Dume SMCA North, since both are located well-within the recommended 54nm from adjacent MPAs on either side.

Additionally, the petitioner cites the location as important nursery habitat for juvenile great white sharks as justification for establishing a no-take SMR. They write, "Research conducted in the Southern California Bight has found that fisheries bycatch is likely the main source of mortality for JWS." However, the article they cite to support this claim, John F. Benson et. al., discloses that for great white sharks they captured and tagged, "mortality risk was substantially greater off the coast of Baja, Mexico compared with California." Importantly, the research paper also states, "that incidental gillnet capture continues to be the primary source of mortality for juveniles. The lower mortality risk we documented in California waters suggests that full closure of gillnet fishing close to shore is a more effective management strategy than simply banning targeted fishing to reduce mortality risk due to bycatch." [5]

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[4] Coats, Francis, and Karrigan Bork. "CALIFORNIA'S CONSTITUTIONAL RIGHT TO FISH." *Environmental Law*, vol. 51, no. 4, 2021, pp. 1085–147. *JSTOR*, https://www.jstor.org/stable/48647570. Accessed 22 Mar. 2023.

[5] Benson JF, Jorgensen SJ, O'Sullivan JB, et al. Juvenile survival, competing risks, and spatial variation in mortality risk of a marine apex predator. *J Appl Ecol*. 2018; 55: 2888–2897. https://doi.org/10.1111/1365-2664.13158

As the petitioner is undoubtedly aware, gillnet fishing is banned in state waters and therefore the proposed MPA would have no impact on the gillnet fishery or likely the mortality risk to great white sharks.

The petitioner notes the location's popularity with recreational lobster divers and the likely opposition from stakeholders who would oppose the additional loss of access. The mortality risk to great white sharks from the recreational lobster fishery is zero, similar to the risk from spearfishing, yet the petitioner seeks to eliminate access entirely without providing any scientific rationale for the closure. As a result, we request that the Commission deny this petition.

Petition 2023-31MPA: *Reclassify Drakes Estero SMCA to an SMR and combine with Estero de Limantour SMR as a single SMR:*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation but encourage the Commission to maintain access for clamming unless there is a clear threat to the fishery or surrounding ecosystem.

It is worth noting that the National Park Service mentions in their comment letter that the area is now Congressionally Designated Wilderness and that "recreational take of shellfish appears to be very rare, [and] requires long kayak trips in wilderness area." Just because something is difficult doesn't mean it should be illegal.

Petition 2023-32MPA: *Reclassify Duxbury Reef SMCA as an SMR and expand northern and southern boundaries*

We recommend that the Commission deny or refer this petition to the Department of Fish & Wildlife for review and recommendation but emphasize maintaining fishing access for local communities at Duxbury Reef. The vast majority of complaints regarding Duxbury reef are related to enforcement and compliance, rather than a scientific justification for eliminating access. Shore fishing is an important past-time for the diverse communities that comprise the North Bay Area, and removing access to a popular fishing destination should not be justified simply based on the actions of a few bad apples.

Petition 2023-33MPA: *Expand the boundaries of five SMRs and one SMCA, and designate a new SMR off Pleasure Point, in Santa Cruz*

We recommend that this petition be denied or referred to the Department of Fish & Wildlife for review and recommendation due to its broad scope and complexity. The petitioner seeks to enhance protections for kelp forests, but does so with an overly broad brush. Rather than advocating for reducing fishing pressure for predators of kelp grazers, like lobster and sheepshead, the petition advocates for the closure of all fishing, including the harvest of grazer species like urchins that have been documented to decimate kelp forests.

The petitioner argues that eliminating fishing pressure within the proposed MPA areas would somehow bolster kelp populations, but the claim is not well documented by scientific research in this petition. A noteworthy case study, by comparison, is the ongoing Tanker's Reef kelp restoration project, where volunteers have been culling purple urchins within study plots and tracking kelp recovery within the study area and a control site nearby. The initial data for the last three years shows a clear correlation between the removal of purple urchins and kelp recovery in the study plot with no kelp recovery in the adjacent control where urchins were not removed. Fishing is permitted in the Tanker's reef area, however, in adjacent MPA's that have not permitted active restoration and where fishing is not allowed, urchin barons persist and kelp recovery remains minimal.

Kelp forest health and resiliency is a complex and multi-variable equation that can be impacted by numerous factors including water temperature, disease, pollution, algal blooms, wave energy, commercial harvest and more. We support efforts to restore kelp forests across the coast and recognize the role they play in the overall ecosystem health of fisheries, especially the abalone fishery that remains closed until 2026. We urge caution, however where broad fishing closures are enacted in the attempt to solve a problem that requires a more nuanced and carefully crafted multidisciplinary approach.

It should also be noted that the petitioner indicates support for recreational hook and line fishing and spearfishing as an acceptable alternative in several of the MPAs referenced in the petition.

Petition 2023-34MPA: *Reclassify Point Buchon SMCA to an SMR and modify take at Farnsworth Onshore and Offshore SMCAs to only allow recreational spearfishing.*

We recommend that the Commission deny this petition and we emphasize the substantial impacts to current fishing access. The petitioner argues that since the salmon season was closed in 2023 it will likely be closed in perpetuity, which would justify eliminating salmon and albacore fishing access at the Point Buchon SMCA. Salmon populations often decrease during drought years and can rebound with increased precipitation or water allocation as was the case in 2008 and 2009 when the fishery was closed and then reopened. We are cautiously optimistic that the salmon numbers will once again bounce back following the increased precipitation received over the past two years.

In the draft Pathways to 30x30 document, the CNRA writes: “It should be noted that limited-take State MPAs provide an excellent model for other jurisdictions looking to balance biodiversity conservation with sustainable well-managed commercial and recreational fishing.” We feel that reclassifying the Point Buchon SMCA as an SMR and eliminating fishing in this area would be inappropriate; however, we support any attempts to improve enforcement and compliance with existing regulations.

Furthermore, the proposal to modify take at Farnsworth Onshore and Offshore SMCAs would disproportionately impact a broad variety and collection of user groups who may not be physically able or inclined to spearfish. For this reason and the lack of concrete scientific data to justify the additional restrictions, we recommend the Commission deny this petition.

Sincerely,

Devin O’Dea
Backcountry Hunters & Anglers

Rachel Fischer
National Marine Manufacturers Association

Wayne Kotow
Coastal Conservation Association California

James Stone
Nor-Cal Guides & Sportsman’s Association

Keely Hopkins
Congressional Sportsman’s Foundation

Larry Phillips
American Sportfishing Association

February 8, 2024

California Fish and Game Commission
715 P Street, 16th Floor,
Sacramento, CA 95814

RE: Discussion Item 10 - Regulation change petitions (marine)

Dear President Sklar, Vice President Zavaleta & Commissioners,

As an organization dedicated to ensuring our North American heritage of hunting and fishing in a natural setting with over 350,000 supporters, Backcountry Hunters & Anglers expresses serious concerns regarding several of the petitions currently before the California Fish & Game Commission that would eliminate fishing access along large stretches of the California coast.

The intent of the Marine Life Protection Act (MLPA) and the stewardship of our coastal resources are of paramount importance to California's heritage. However, these laudable goals and conservation benchmarks should not preclude access to harvest coastal foods where state and federal fisheries managers have demonstrated robust and resilient fish stocks without any current threat of overfishing, nor for those species where targeted fishing and active management would benefit the overall ecosystem balance.

There are numerous, seemingly well-intentioned petitions currently before the Fish & Game Commission that seek to preserve California's coastal waters citing anthropogenic impacts to biodiversity and ecosystems, such as pollution, rising sea temperatures, disease, development and fishing. While we support the intent to safeguard our fish stocks, biodiversity, and ecosystem integrity, we strongly disagree with the all-or-nothing approach adopted by many of the petitioners who proffer the wholesale elimination of fishing access without adequate scientific rationale.

Simply put, many of the petitions seek to advance preservation at all costs, pushing for wholesale closures that circumvent the regulatory processes already in place, ultimately bludgeoning access for the diverse angling communities that have revered these coastal traditions for generations.

Shore fishing, diving/spearfishing, kayak/boat fishing and coastal gathering are low impact activities that reflect the broad spectrum of California's diverse community and constitute a valuable resource for individuals across the economic divide to access nature and provide food for their families at the same time. We encourage the Commission and MPA managers to consider the numerous communities that enjoy the state's many sustainable food resources when considering protections and recommendations that might unnecessarily exclude these groups.

It is within this context that we urge the Commission to deny those petitions (outlined in our detailed letter to the Commission on 2/1/24) that would unnecessarily erode our longstanding coastal fishing and foraging traditions.

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2024-02-05 23:50:53.107		Bob	Nelson						US	Petition Signed
2024-02-05 23:27:03.35	Mr.	Christopher	Reiger		[redacted]	Santa Rosa	CA	[redacted]	US	Petition Signed
2024-02-05 23:20:30.843		Fredrick	Robinson						US	Petition Signed
2024-02-05 23:18:20.8		Michael	Snyder						US	Petition Signed
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2024-02-05 22:57:33.25		jeremy	mcmillin						US	Petition Signed
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2024-02-05 21:12:35.05	Mr.	Nick	Zagaris		[redacted]	Auburn	CA	[redacted]	US	Petition Signed
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2024-02-02 21:01:20.403		Adrian	Silveira						US	Petition Signed
2024-02-02 20:58:02.777		Shaun	Ayers						US	Petition Signed
2024-02-02 20:56:18.6		Tom	Stubbs						US	Petition Signed
2024-02-02 20:44:54.14		Rafael	Santillan						US	Petition Signed
2024-02-02 20:42:57.203		Alex	Selman						US	Petition Signed
2024-02-02 20:31:49.4		Zane	Murphy						US	Petition Signed
2024-02-02 20:21:30.41		Jeremy	Kerekes						US	Petition Signed
2024-02-02 20:20:07.45		Eric	Manahan		[redacted]	Hollis	ME	[redacted]	US	Petition Signed
2024-02-02 20:18:56.503		Marcus	LeBlanc		[redacted]	Grover beach	CA	[redacted]	US	Petition Signed
2024-02-02 20:10:44.193		Dave	Gifford						US	Petition Signed
2024-02-02 19:56:09.143		Dave	Rechel						US	Petition Signed
2024-02-02 19:43:54.443		Gabriel	Silveira						US	Petition Signed
2024-02-02 19:43:17.527		Eric	Bodjanac						US	Petition Signed
2024-02-02 19:40:58.32		Jesus	Padiernos						US	Petition Signed
2024-02-02 19:29:09.317		Jaime	Gutierrez						US	Petition Signed
2024-02-02 19:27:36.86		Darren	Gertler						US	Petition Signed
2024-02-02 19:15:32.903		SynKae	NG						US	Petition Signed
2024-02-02 19:15:13.213		Daniel	Silveira						US	Petition Signed
2024-02-02 19:06:32.177		Matthew	Bond						US	Petition Signed
2024-02-02 18:56:00.567		Cole	Pickford						US	Petition Signed
2024-02-02 18:55:34.027		Nick	DeFerrari						US	Petition Signed
2024-02-02 18:43:33.243		Cecilia	Giddings						US	Petition Signed
2024-02-02 18:05:26.83		Isaac	Beck						US	Petition Signed
2024-02-02 17:46:21.643		Clayton	Beaver						US	Petition Signed
2024-02-02 17:45:06.907		Travis	Craven						US	Petition Signed
2024-02-02 17:30:47.033		Eric	Tye						US	Petition Signed
2024-02-02 17:16:16.94		Benjamin	Kaslin						US	Petition Signed

2024-02-02 16:25:01.977		Matt	Rose						US	Petition Signed
2024-02-02 16:10:12.253		Kevin	Vella						US	Petition Signed
2024-02-02 15:56:10.45		Charlie	de la Rosa						US	Petition Signed
2024-02-02 15:55:01.117		Nicholas	Angus						US	Petition Signed
2024-02-02 15:38:15.073		Nick	Ippolito						US	Petition Signed
2024-02-02 15:34:39.867		Artin	Marootian						US	Petition Signed
2024-02-02 14:57:10.573		Sam	Narveson						US	Petition Signed
2024-02-02 14:52:04.667		Jacob	Morris						US	Petition Signed
2024-02-02 14:48:19.837		Jonathan	Hoang						US	Petition Signed
2024-02-02 14:44:36.137		Mitchell	Ward						US	Petition Signed
2024-02-02 14:40:14.187		Logan	Little						US	Petition Signed
2024-02-02 14:29:39.883		Josef	Sanchez						US	Petition Signed
2024-02-02 14:25:41.613		Leif	Bierer						US	Petition Signed
2024-02-02 14:09:39.14		JESSE	STOVALL		[redacted]	Fiddletown	CA	[redacted]	US	Petition Signed
2024-02-02 14:09:23.547		Mike	Costello						US	Petition Signed
2024-02-02 14:03:34.583	Mr.	Hunter	Miller		[redacted]	Kuna	ID	[redacted]	US	Petition Signed
2024-02-02 14:02:35.91		Jordan	Germyn						US	Petition Signed
2024-02-02 13:58:56.873		Gilberto	Garcia						US	Petition Signed
2024-02-02 13:58:51.957		Rod	Kazempour						US	Petition Signed
2024-02-02 13:56:33.713		Andrew	Miller						US	Petition Signed
2024-02-02 13:55:22.597		Micah	Dungey						US	Petition Signed
2024-02-02 13:51:26.967		Jacob	Weber						US	Petition Signed
2024-02-02 13:50:04.897		Chris	Chun						US	Petition Signed
2024-02-02 13:48:43.423		Jerry	Chang						US	Petition Signed
2024-02-02 13:48:06.903		Clayton	Thornton						US	Petition Signed
2024-02-02 13:47:17.947		Christopher	James						US	Petition Signed
2024-02-02 13:45:51.557		John	Phillips						US	Petition Signed
2024-02-02 13:45:40.09		James	Killiany						US	Petition Signed
2024-02-02 13:40:12.057		Richard	Owens						US	Petition Signed
2024-02-02 13:37:41.607	Mr.	Blane	Markham		[redacted]	Carmel	CA	[redacted]	US	Petition Signed
2024-02-02 13:36:49.903		Connor	Weber						US	Petition Signed
2024-02-02 13:35:29.397		Logan	Gillingham						US	Petition Signed
2024-02-02 13:31:21.977		Dennis	Kilian						US	Petition Signed
2024-02-02 13:29:17.553		Daniel	Collins						US	Petition Signed
2024-02-02 13:23:58.117		Phillip	Sanders						US	Petition Signed
2024-02-02 13:17:26.583		Derrik	Kapalla						US	Petition Signed
2024-02-02 13:16:58.097		Craig	Simes						US	Petition Signed
2024-02-02 13:15:13.017		Valerie	Bednarski						US	Petition Signed
2024-02-02 13:14:01.07		Elijah	Black						US	Petition Signed
2024-02-02 13:12:08.623		Philip	Adornato						US	Petition Signed
2024-02-02 13:10:44.163		owen	shapiro						US	Petition Signed
2024-02-02 13:10:37.263		Steve	Dolan						US	Petition Signed
2024-02-02 13:09:39.617		Nick	Garcia						US	Petition Signed
2024-02-01 21:14:07.19		Keynan	Hobbs						US	Petition Signed
2024-02-01 19:52:19.6		Allen	Noren						US	Petition Signed
2024-02-01 19:31:26.837		Devin	O'Dea						US	Petition Signed

From: California Fishermens Resiliency Association <californiafishermensresiliency@gmail.com>
Sent: Wednesday, July 3, 2024 06:44 PM
To: FGC <FGC@fgc.ca.gov>
Cc: [redacted] Steve Scheiblauer <[redacted]>; Dave Colker <[redacted]>; Jake Mitchell <[redacted]>; [redacted]
Subject: MPA Petitions Support/Object

California Fish and Game Commission
PO Box 944209
1416 Ninth Street Suite 1320
Sacramento, California 94244-2090

July 3, 2024

Re: MPA Petitions/Support/Object

Commissioners:

The California Fisherman's Resiliency Association (CFRA) expresses its support for the following Marine Protected Area (MPA) petitions:

2023 - 14 MPA
2023 - 15 MPA
2023 - 16 MPA
2023 - 18 MPA
2023 - 30 MPA

Our support is based on research conducted by the University of Washington (sustainable fisheries- us.org) which exactly states that MPA's have no positive affect on threats to marine life posed by ocean acidification, global warming, coastal development, terrestrial and urban run-off and human pollution of the world environment. "Recent reviews of the extensive MPA network in California have concluded there is no evidence for a regional increase in biodiversity, or targeted fish abundance, nor is there evidence for MPA's providing climate resiliency"

We provide no support for the following MPA petitions:

2023 - 19 MPA
2023 - 20 MPA
2023 - 21 MPA
2023 - 22 MPA
2023 - 23 MPA
2023 - 24 MPA
2023 - 25 MPA
2023 - 26 MPA
2023 - 28 MPA
2023 - 29 MPA
2023 - 31 MPA
2023 - 32 MPA
2023 - 33 MPA
2023 - 34 MPA

Thank you for this opportunity to comment.

Ken Bates, Executive Director
California Fishermen's Resiliency Association Member Associations

Crescent City Commercial Fishermen's Association
Trinidad Bay Fishermen's Association
Shelter Cove Fishermen's Preservation, Inc.
Salmon Troller's Marketing Association of Noyo
Bodega Bay Commercial Fishermen's Association
San Francisco Crab Boat Owners Association
Half Moon Bay Commercial Fishermen's Association
The Alliance of Communities for Sustainable Fisheries
Commercial Fishermen of Santa Barbara
Santa Cruz Commercial Fishermen's Association
Pacific Coast Federation of Fishermen's Associations

Cc: Dave Colker
Peter Halmay
Steve Scheiblauer
Jake Mitchell

Please Strengthen And Expand California's Marine Protected Area Network

David Jens Thomas Pedersen <[redacted]>
Sat 08/03/2024 10:00 PM
To:FGC <FGC@fgc.ca.gov>

Dear California Fish and Game Commission,

I respectfully submit these comments to urge you to strengthen California's network of Marine Protected Areas (MPAs). Specifically, I ask that you please add two new MPAs to the existing network: Point Sal State Marine Reserve, and Mishopshno State Marine Conservation Area. These two areas are ecologically rich and would provide significant science-based benefits to the overall health of our marine areas. The Mishopshno MPA would be strategically located in order to create greater connectivity for the whole network. In addition, both proposed MPAs have historic cultural significance for the Chumash people. On top of creating these new MPAs, I also ask that you please strengthen protections for and in the existing network by restricting or prohibiting activities that are shown to harm or risk harming the health of the network to ensure its longevity and availability as a resource to all.

Research on California's MPA network shows fish are larger and more abundant inside many of the protected areas, four-fifths (of the ones analyzed in the studies) had healthier populations than compared to unprotected areas, and the overall network had more coral, sponges, and other animals that are significantly associated with thriving habitats. While It is clear that we're seeing initial progress and that the existing protections are effective and work to benefit the overall health of our ocean, we must protect the existing network and go further to unlock the full potential benefits of the network.

Accordingly, I respectfully you to maintain California's status as an ocean conservation champion, especially in the face of ocean industrialization, marine crowding, and climate change. The ocean is a dynamic, constantly changing system with a bevy of uncertainties, which necessitates the adaptive management of MPAs to durably protect our shared marine resources.

Thank you for your time and consideration.

Regards,

David Pedersen

[redacted]

[redacted]

From: Corie Erskine <[redacted]>
Sent: Tuesday, November 5, 2024 10:32 PM
To: FGC <FGC@fgc.ca.gov>
Subject: Point Sal SMR 2023-28MPA & MPA 2023-19MPA Public Comment PSLCFA

Hello,

Please see the attached comment from the Port San Luis Commercial Fishermen's Association in Avila Beach, CA concerning the agenda items below.

Point Sal SMR 2023-28MPA

MPA 2023-19MPA

Thank you,

Corie Erskine

Board Member, PSLCFA

PORT SAN LUIS COMMERCIAL FISHERMEN'S ASSOCIATION
P.O. BOX 513
AVILA, CA 93424

Board of Directors:

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MICHAEL COHEN *Vice President*
YERN PAVONE *Secretary/Treasurer*
CORIE ERSKINE
ROSS RICKARD
HENRY LARA
JUSTIN FRANKLIN

Attn: California Fish & Game Commission's Marine Resources Committee (MRC)
RE: Point Sal SMR 2023-28MPA (termed SMCA)
SUBJECT: PSLCFA's Opposition to Proposed SMR
Oct. 26, 2024

The Port San Luis Commercial Fishermen's Association (PSLCFA) was established in 1964 as a 501(c)6 nonprofit organization. PSLCFA members generate millions of dollars in local community revenue each year. We currently have 75 registered members. However, our unregistered numbers greatly exceed 100 as fishing in our community continues to be a family affair, passing along this time-honored tradition to future generations. Our PSLCFA members participate in groundfish, coastal pelagic species, halibut, crab, highly migratory species such as albacore, salmon, and/or hagfish fisheries, both commercially and recreationally (outside our association). The PSLCFA represents a significantly vested interest in fishery activities on the California coast. Our central coast fishermen land the most live fish on the West Coast. At least 65% of fishermen in our area rely on the live fish market for their main income source, fishing mostly through nearshore groundfish permits inside 3 miles with the primary take method being hook and line.

Contrary to the petitioner claims, the proposed SMR around Point Sal in central California poses a threat to the livelihood of California fishermen specifically the members of the PSLCFA. The area identified for proposal encompasses fruitful fishing grounds where our members' harvest activities occur.

The PSLCFA urges the California Fish and Game Commission's Marine Resources Committee to consider the dire consequences to our local commercial fishermen from enacting a Point Sal SMR. While the petition states the data from the overlapping commercial fishing blocks contributes to 1.1% of the central coast's landings by value, it fails to look at the local effects that 1.1% actually has. In the same dataset timeframe on the MFDE, 2012-2022, the local port to the MPA, Port San Luis/Avila had 28.12% of its commercial revenue alone come from the overlapping blocks, 631 and 632. More specifically 25.92% of the port's groundfish revenue

PORT SAN LUIS COMMERCIAL FISHERMEN'S ASSOCIATION
P.O. BOX 513
AVILA, CA 93424

and 57.79% of the port's crab revenue based on the dataset referenced. Further, upon speaking with our members, we have identified that many members have inadvertently misclassified their reported catch block which should have fallen under 631 and 632. Therefore, due to this, we anticipate the catch rate and revenue accumulated from this area to be significantly larger than shown in the dataset used for justification of this SMR proposal. Our members are making adjustments for future landings, but this will not be reflected in historical data and should be considered in this SMR's determination.

Further, disproportionate management such as enacting the proposed Point Sal SMR will undoubtedly result in the systemic dismantling of fishery culture on the California Coast and the economic ramifications will be felt far beyond.

The west coast fishing industry and coastal community businesses who normally benefit from derived demand are already facing economic decline directly related to the regulatory restrictions limiting the Dungeness crab season by 3 months and the inadvertent creation of a uniform west coast season opener date. The PFMC's decision for salmon season closures the last two years exacerbated this downward trend. The fishermen who would normally depend on one or both of those fishers for their livelihood have now expanded into the sablefish, groundfish, and albacore fisheries or the recreational sector in order to compensate for their lack of income. A preexisting high level of market competition from unregulated seafood importers and aquaculture production already presents downward pressure on the price of fish. This shift in the dedicated labor harvesting local wild fish has led to an influx of fish supply and market saturation wherein the price of fish sold off the boat has plummeted creating instability in other fisheries. Once again, in order to compensate for their income deficiency at this lowered price of goods, fishermen have been forced to increase catch volumes in these alternative fisheries. The government possess the power to waive permit fees, temporarily suspend fishery related taxes, issue financial relief, subsidize marine fuel, and/ or limit imported seafood from countries known for practicing unsustainable fishing but there has been zero regulatory reprieve to assist fishermen through this hardship. Closure of nearshore fruitful fishing grounds imposed by this SMR will place further unnecessary pressure on our local industry. By limiting This unfairly confines the potential income of fishermen involved in the commercial and recreational fisheries on the coast of California. The proposed SMR will especially harm the PSLCFA as many of our members are relatively new fishermen who have over $100k invested in assets and depend on this location to support their sole income.

Due to the already negatively impacted state of fisheries our fishermen frequently venture along the California Coast specifically North to the Morro Bay area and just South to Santa Barbara. Therefore, we stand in solidarity and brotherhood with the Morro Bay Commercial

PORT SAN LUIS COMMERCIAL FISHERMEN'S ASSOCIATION
P.O. BOX 513
AVILA, CA 93424

Fisherman's Association and the Santa Barbara Commercial Fisherman's Association against further MPA creation in this coastal region especial, MPA 2023-19MPA. The commercial blocks overlapping the proposed SMCA account for 6.2% of Morro Bay's landing revenue alone. More specifically, these blocks represent 25% of the area's squid landings, 8.8% of the groundfish landings, and 15% of the area's salmon landings per the MFDE. Closing this area to exclusively commercial fishermen would only continue to reduce fishable area for a shrinking industry and offer no benefits of the so-called "spillover effect" to restricted fisheries due to the still-allowed recreational take. There is zero public benefit which would come from MPA closures and restrictions but the impact to the livelihood of fishermen families would be devastating.

We urge you to question the policy methodology of MPA's along our coast- are these protective measures truly addressing a threat worth sacrificing the livelihood of us hardworking Americans?

Thank you for your time and consideration!

Sincerely,

Chris Pavone
President, PSLCFA

From: Erin Eastwood <[redacted]>
Sent: Friday, February 28, 2025 4:21:06 PM
To: FGC <FGC@fgc.ca.gov>
Subject: Written Comment for March 13 MRC Meeting

Hello,

Please see the written comment from the Santa Ynez Band of Chumash Indians, Environmental Defense Center, and the Natural Resources Defense Council, attached. Thank you for your consideration.

--

Erin Eastwood

Founder and Principal

Blue Spark Strategies, LLC

[redacted]

[redacted]

February 28, 2025

Samantha Murray, Vice President
California Fish and Game Commission
715 P Street, 16th Floor
Sacramento, CA 95817

Submitted electronically to fgc@fgc.ca.gov

RE: Comments on Fish and Game Commission Marine Resources Committee March 2025 Meeting Agenda Item 5 A II: *MPA Regulation Change Petitions*

Dear Vice President Murray and Commissioner Sklar:

The Natural Resources Defense Council (NRDC) submitted two petitions to designate new Marine Protected Areas (MPAs) in Santa Barbara County:

- Petition 2023-28-MPA proposes a new MPA in the waters surrounding Point Sal.
- Petition 2023-29MPA, submitted with the co-sponsors, Santa Ynez Band of Chumash Indians (SYBCI) and Environmental Defense Center (EDC), proposes a California-Chumash co-managed MPA off the coast of Carpinteria to be named Mishopshno.

For each petition, we conducted initial outreach during late Summer and Fall 2023 before submission to the Commission. More sustained outreach efforts began upon the petitions' formal acceptance by the Commission in December 2023. We provided an update on our outreach in July 2024, and this letter will describe our subsequent outreach efforts.

Since January 2024, our two organizations and Tribal nation have conducted over 100 meetings and phone calls with stakeholders and community members. Many of the meetings since July 2024 are follow up meetings where we have solicited feedback on the proposed boundaries and regulations and worked to build support for the petitions and address concerns with the proposals. Since the July update, we have conducted additional outreach to local Tribal members and organizations, local fishing representatives, elected officials, and local businesses and community members. We have attended community meetings, fishing association meetings, and hosted public webinars to reach and hear from as many stakeholders as possible. We plan to submit amendments for both of our petitions to the Fish & Game Commission by the March deadline. These amendments will reflect the discussions we have had with Tribes and fishers.

Throughout this process, we have prioritized 1) connecting with the local community, 2) responding to questions, ideas, and concerns, and 3) sharing information as broadly as possible so all interested parties can come to the table to inform upcoming decision-making moments. For the Mishopshno petition in particular, SYBCI, EDC, and NRDC have undertaken our outreach efforts as a team.

We have shared the following types of information throughout our outreach efforts:

- Background on the MPA Network, Marine Life Protection Act goals, Decadal Management Review and its findings, and the latest science

- Fish and Game Commission meeting updates
- MPA petition evaluation timeline and process updates
- Opportunities for public participation
- Research and outreach findings
- MPA petition details

Throughout our outreach, our organizations and Tribal nation have connected with hundreds of interested individuals via email, phone calls, and virtual and in-person meetings, including:

- Federally and non-federally recognized Tribes
- Tribal non-profit organizations
- City Council members, District Supervisors, Mayors, city staff
- Congressional, Assembly, and Senate offices and district staff
- Local and State agencies (i.e., Santa Barbara Flood Control District, Santa Barbara County Parks, State Parks, etc.)
- Local businesses
- Local scientists
- Commercial fishing representatives
- Local recreational fishers (e.g., spearfishers, catch-and-release fishers)
- Local homeowners
- Local, state, and national non-profit organizations
- Youth
- Community centers

These conversations have improved our understanding of the Carpinteria and Point Sal regions, highlighted community support for protecting the coastal waters in those areas and concerns about how it is done, shaped our supplemental site-specific research, and informed our verbal and written public comments to the Commission. We hope the insight and supplemental information gathered through our outreach efforts maximize each petition's potential to strengthen our MPA Network.

In the coming months, we hope to build on the connections we've made thus far and to engage with key stakeholders and members of Tribal nations we haven't yet reached. We look forward to sharing our outreach and supplemental research findings with the CDFW and FGC teams to inform the evaluation of petitions 2023-28MPA and 2023-29MPA.

Thank you for the opportunity to weigh in on the adaptive management of California's MPA Network.

Sincerely,

Sandy Aylesworth
Director, Pacific Initiative, Nature
Natural Resources Defense Council

Sam Cohen
Government Affairs and Legal Officer

Santa Ynez Band of Chumash Indians

Azsha Hudson
Marine Conservation Analyst & Program Manager
Environmental Defense Center

City of Guadalupe

Administration Department
918 Obispo Street
P.O. Box 908
Guadalupe, CA 93434

Rec'd
CALIFORNIA
FISH AND GAME
COMMISSION
4/3/2025

March 18, 2025

Erika Zavaleta, President
California Fish and Game Commission
715 P Street, 16th Floor
Sacramento, CA 95817

Re: Letter of Support for Petition 2023-28-MPA

Dear President Zavaleta and Honorable Commissioners,

I am writing to express my support for Petition 2023-28-MPA, which would designate a new marine protected area (MPA) off the coast of Point Sal. As a lifelong resident and current mayor of Guadalupe, the closest city to Point Sal, I believe this new MPA will benefit our community and safeguard a cherished natural space for the residents of Guadalupe and visitors to our area.

I have been coming to Point Sal since I was a young boy. Like many other community residents within the Santa Maria Valley, the Point Sal area and the waters identified in the proposed Point Sal Area, believe that this protection is necessary to protect and enhance the waters residents have enjoyed for decades. This designation will protect the Point Sal MPA for generations to come. Located at the convergence of two major ocean currents, the highly productive waters around Point Sal are home to kelp beds, rich tidepools, and a diversity of marine life including humpback whales, gray whales, sea lions, seals, sea otters, seabirds, and more. Many residents of Guadalupe frequent the trails to Point Sal overlooking the coast to view wildlife, relax at the beach, and enjoy the remote and pristine area. When it was accessible, many in our community would visit Point Sal State Beach to spend time with family and enjoy the shore. This area is important to my community, my neighbors, and my constituents. Ensuring that we protect it for future generations aligns deeply with the City of Guadalupe's values.

The Central Coast's world-famous coastline is a biodiversity hotspot for marine life and attracts visitors from around the world. In 2023, tourism brought just over $2 billion (about $6.2 per person in the US) in travel-related spending to Santa Barbara County and supported more than 20,000 jobs. Continuing to build and strengthen our tradition of ecotourism is a priority of the City of Guadalupe. Our local economy believes that this MPA designation will enhance tourism for our area in collaboration with the Guadalupe Dunes Non-Profit, the Guadalupe Business

Association, Inc., as well as the Santa Maria Valley Chamber of Commerce. Acting to secure ocean protections now will help our local economy stay vibrant in the long run – ultimately supporting the many local businesses and tourism operations that rely on healthy landscapes and seascapes.

Further, the City of Guadalupe acknowledges and supports the importance of Chumash people's historic and contemporary connection to this place. Historically, Point Sal holds cultural significance for the Chumash people, with evidence of habitation as far back as 4,800 years ago. Chumash artifacts are visible throughout Point Sal, and analyses of burial sites from the area demonstrate the rich cultural ties to the traditional stewards of this land. The city was proud to support the recent designation of the Chumash Heritage Marine National Sanctuary, and we are pleased to support this proposal that honors and protects culturally significant waters for the Chumash people.

We commend the continued work of the Commission to advance the conservation of our state's valuable and unique marine resources. Designating a protected area at Point Sal will further bolster the strength of California's MPA network, support local communities and businesses, and safeguard our coastal ecosystems for future generations. Thank you for your consideration of this petition, and the opportunity to submit recommendations for the adaptive management of California's MPA network as part of the Decadal Management Review process.

Sincerely,

Ariston D. Julian, Mayor
City of Guadalupe

Administration Department:
Tel (805) 356.3891 Fax (805) 343.5512 *918 Obispo Street P.O. Box 908, Guadalupe CA 93434*

From: Jeanne Sparks <[redacted]>
Sent: Thursday, March 13, 2025 07:08 PM
To: FGC <FGC@fgc.ca.gov>
Cc: Sandy Aylesworth <[redacted]>; SBCAN <[redacted]>
Subject: SUPPORT FOR PETITION 2023-28MPA

I am sending a letter from Santa Barbara County Action Network supporting the proposed Pt. Sal State Marine Reserve. Please distribute to the commission.

Thank you,

Jeanne Sparks

Co-Executive Director

Santa Barbara County Action Network

[redacted]

www.sbcan.org

[redacted]

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Nancy Avoce
Assistant Director

SANTA BARBARA COUNTY ACTION NETWORK
P.O. Box 6174
Santa Maria, CA 93456
info@sbcan.org
www.sbcan.org
Facebook.com/SBCANorg
805.563.0463

March 14, 2025

Erika Zavaleta, President
California Fish and Game Commission
715 P Street, 16th Floor
Sacramento, CA 95814
fgc@fgc.ca.gov

Re: Support for Petition 2023-28MPA

Dear President Zavaleta and Honorable Commissioners:

Santa Barbara County Action Network supports the proposed Point Sal State Marine Reserve (Petition 2023-28MPA) near the city of Guadalupe. 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. SB*CAN* urges you to approve this proposal.

The Point Sal MPA would conserve an important habitat that supports 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 this area would have positive impacts that spread beyond its boundary, 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. 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 our state's biodiversity is critical at a time when ocean conservation is more important than ever. 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, provide additional resilience in the face of climate change, and protect critical marine habitats.

Sincerely,

Jeanne Sparks, Co-Executive Director

Ken Hough, Co-Executive Director

ROY LEE
First District Supervisor

BOARD OF SUPERVISORS
County Administration Building
105 East Anapamu Street
Santa Barbara, CA 93101
Telephone: (805) 568-2190
www.countyofsb.org

COUNTY OF SANTA BARBARA

April 15, 2025

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

Re: Support for Petitions 2023-28MPA and 2023-29MPA

Dear President Zavaleta and Honorable Commissioners:

I am writing in 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. A healthy ocean is the heartbeat of Santa Barbara County – residents, and visitors alike rely on our pristine waters, inviting beaches, and safe and accessible recreation. 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.

Conserving Point Sal and Mishopshno MPAs will have powerful ripple effects:

- Conserve important habitats that support rich biodiversity such as kelp forests, rocky reefs, tidepools, sandy beaches, migratory whale corridors, important larval retention zones, and a seabird and sea lion rookeries.
- Bolster ocean resilience to keep our coastal waters healthy
- Encourage accessible recreation by local and visiting hikers, surfers, shore fishers, swimmers, kayakers, birdwatchers, beach walkers, and families of all ages.
- Create safe and sustainable conditions for commercial fishers
- Honor and strengthen the Chumash peoples' stewardship of the area and elevate their historical and present-day connection to the region.

The support for these two MPAs is well researched and representative of many interests. The Natural Resources Defense Council (NRDC), alongside the Santa Ynez Band of Chumash Indians and the Environmental Defense Center, conducted extensive outreach and research regarding the MPAs throughout Santa Barbara County. Since December 2023, the coalition has held over 100 meetings with Tribes, fishers, scientists, local leaders, and community members to gather input, share information, and refine proposals. Their outreach included webinars, public meetings, and direct engagement, emphasizing transparency and collaboration. These efforts

have informed petition amendments and supplemental research, ensuring both ecological goals and community priorities are reflected.

In response to feedback, the coalition modified proposed boundaries and regulations to address fishing concerns, Tribal perspectives, and local economic impacts—ensuring the petitions reflect both science and community values.

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. And that's a huge boon to the economy – collectively, ocean-based recreational activities contribute to our state's $28 billion ocean tourism and recreation economy.[1] In 2023, coastal tourism brought just over $2 billion in travel-related spending to Santa Barbara County, and supported more than 20,000 jobs.[2]

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 our strong support for these proposals that aim 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.

Respectfully,

Roy Lee
Supervisor, First District
Santa Barbara County

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

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

Outlook

Expansion of State Marine Conservation Area

From mckennal@onecoolearth.org <[redacted]>
Date Wed 06/18/2025 09:25 PM
To FGC <FGC@fgc.ca.gov>

Dear California Fish & Game Commission,

As a Californian from Los Osos, I support the expansion of 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 the coastline here is what makes my home, my home. My family surfs and swims and we depend on our beaches for community connections. Please keep our coastlines protected.

Sincerely,

McKenna Lenhart
Phone: [redacted]
[redacted] Los Osos CA [redacted]

Northern Chumash Tribal Council

northernchumash.org chumashsanctuary.org

CHUMASH HERITAGE
National Marine Sanctuary

October 13, 2025

Dear Fish and Game Commission and CDFW staff,

I am writing to notify you that the Northern Chumash Tribal Council (NCTC) is in the process of finalizing formal co-sponsorship of Petition 2023-28MPA with the Natural Resources Defense Council (NRDC). Petition 2023-28 MPA would create a new State Marine Conservation Area off of Point Sal in state waters within the Chumash Heritage National Marine Sanctuary (CHNMS). NRDC initially contacted us in the fall of 2023 before the petition was written, however we did not have the capacity to be involved at that time due to the designation process of CHNMS. Now that the CHNMS has been designated, I am eager to continue garnering strong protections to the sacred and culturally important waters of Point Sal, as part of NCTC's ongoing leadership in Chumash stewardship of California's marine resources.

We are in the final stages of formalizing the co-sponsorship agreement and will submit an amended petition form and narrative that details our Chumash collaborative co-stewardship approach and goals as a Tribally co-sponsored petition within the next couple of weeks. We would like Petition 2023-28MPA to be reclassified as a Tribal petition. We recognize that this is a significant change during the review process and appreciate your understanding that we had limited capacity to engage earlier. Please let us know if you have any questions or would like to schedule a meeting to discuss this addition in sponsorship.

Sincerely,

Violet Sage Walker
Nominator, Chumash Heritage National Marine Sanctuary
Chairwoman, Northern Chumash Tribal Council

CALIFORNIA FISH AND GAME COMMISSION
RECEIVED 10/24/2025

Planning and Development
Lisa Plowman, Director
Jeff Wilson, Assistant Director
Elise Dale, Assistant Director

Dear Ms. Miller-Henson,

As Secretary of the Santa Barbara County Fish and Wildlife Commission, I am submitting the attached letter containing formal comments regarding the current Marine Protected Area (MPA) petitions under consideration. This letter reflects the collective position of the full Commission, which includes signatures from all nine appointed members, representing diverse stakeholder groups within Santa Barbara County.

Our Commission has thoroughly reviewed the details of Petitions 2023-14MPA, 2023-15MPA-AM, 2023-18MPA, 2023-28MPA-AM, 2023-29MPA-AM, and 2023-33MPA-AM. As outlined in the attached document, our positions and recommendations were developed through numerous public meetings and extensive local input, based on decades of combined experience in fish and wildlife matters across the county.

We appreciate the opportunity to contribute to the discussion surrounding MPA management and thank the California Fish and Game Commission for its continued commitment to public engagement and science-informed decision-making. Should you or your staff require any further clarification or supporting materials, please do not hesitate to contact me directly.

Sincerely,

Secretary, Santa Barbara County Fish and Wildlife Commission
Phone: 805-934-6297
Email: castrot@countyofsb.org

one COUNTY one FUTURE

Planning and Development
Lisa Plowman, Director
Jeff Wilson, Assistant Director
Elise Dale, Assistant Director

October 20, 2025

To: Ms. Melissa Miller-Henson

Executive Director

California Fish and Game Commission

715 "P" St. 16th Floor Sacramento, CA 95814

From: Santa Barbara County Fish and Wildlife Commission

c/o Santa Barbara County Planning and Development

624 W. Foster Road. Santa Maria, CA 93455

Dear Ms. Miller-Henson,

The Santa Barbara Fish and Wildlife Commission is a county commission consisting of nine members appointed by the Santa Barbara County Board of Supervisors. The commission, among other things, aids the county board on active fish and wildlife related matters with our combined hundreds of years of local fish and wildlife experience between our fellow commissioners.

This comment letter serves to provide our input regarding the current MPA petitions requesting changes be made to the MPA network specifically around the Santa Barbara Channel and Channel Islands. We feel our county fish and wildlife commission's input on the MPA petition process may prove especially valuable due to our local experiences and local understanding of the ecosystem, as well as our variety of backgrounds, consisting of non-consumptive users, fishermen, and biological scientists. This letter serves as a culmination of many public meetings learning about the MPA petitions that have been proposed as well as fellow commissioners observations being involved in local discussions about the petitions outside of official meetings to gauge public input and sentiment. This county commission appreciates the opportunity to provide the following feedback on these local MPA petitions.

Petition2023-14MPA

Petition2023-14MPA requests changes to several State Marine Conservation Areas (SMCAs), one of which, the Naples SMCA, is within the County. Generally, SMCAs already allow for some form of limited take, this petition requests adding commercial take of sea urchins to the allowable methods list inside of the SMCAs in the petition.

Sea urchins are primarily taken commercially and are a core part of the County's commercial fishing sector. Urchins, and their tendency to graze on the root systems of local kelp forests, have recently posed problems with kelp rebuilding efforts after El Ninos in the 2010's reduced kelp forest size noticeably. Local fishermen cite urchin barrens inside of MPAs that cannot be touched and continue to spread to the surrounding area with no possible measures existing to remove the main mass from the MPA.

Recommendation: While cases may vary across different MPAs and counties, for the above reasons, this commission finds it reasonable to allow the proposed change and supports the petition for allowed sea urchin take at the Naples SMCA to help facilitate kelp forest regrowth. We kindly recommend this change be allowed at Naples.

Petition2023-15MPA-AM

Petition2023-15MPA requests changes to three joint State and Federal Marine Reserves (SMRs/FMRs), all of which, the Footprint SMR/FMR, Gull Island SMR/FMR, and Santa Barbara Island SMR/FMR, border the county. These MPAs, and others around the Channel Islands, are unique to the State network in that they were established through a joint process between State and Federal agencies before the coastal MLPA under the CINMS. The resulting network was a series of state and federal MPAs at the Channel Islands that covers federal water up to 6 nautical miles from the islands. All SMRs and FMRs the petition addresses are currently no-take areas.

The petition requests changing these areas to joint State and Federal Marine Conservation Areas, SMCAs and FMCAs, and proposes several options that allow for various forms of the limited take of pelagic finfish or highly migratory species recreationally and commercially. In addition, the petition provides possible sub-divisions of the Gull Island and Santa Barbara Island State MPAs into nearshore and offshore areas, similar to other State MPAs elsewhere. The primary arguments of the petition are the minimal impact pelagic fishing effort has on the local MPA ecosystem and goals, and the support of pelagic areas in the State's MPA Master Plans and other documents seen in the broader coastal network but apparent lack thereof in the pre-Master Plan Channel Islands network.

Several members of this commission were part of the original process at the Channel Islands over 20 years ago and the southern MLPA in 2012. We all understand that the primary factor for the MPA implementation at these island sites offshore was to originally protect species like groundfish and structure groundfish live on to rebuild overfished populations at the time. While MPA goals have changed since the 2000s, this fact is still key to understanding why these areas are the way they are today.

Pelagic fish, and the methods used to target them, are predominantly fished near the surface of the water column, offshore, and off the bottom. This type of effort avoids the nearshore or offshore rocky-bottom ecosystems local nearshore species or groundfish are predominantly found in. In addition, the pelagic species that would be taken in these areas are significantly less affected by these MPAs and the broader network due to them being very mobile, their relative abundance is not concentrated in an MPA compared to out of one. The MPA Master Plans from 2008 and 2016 discuss this, citing the lower effects that MPAs have on pelagic species and the need to have areas that allow for some form of limited pelagic take, aligning the petitioner's arguments with the Master Plans. In addition, the petition does point out an imbalance in pelagic allowed areas between the MLPA's coastal implementation phases that came after the first MPA Master Plan in 2008 and the Channel Islands Network implementation that came well before the first MPA Master Plan in the early 2000's.

Outside the Channel Islands, in the coastal network that came afterwards, most MPAs that overlap deeper waters pelagic species pass through allow for some form of take of pelagic finfish. Observing the Channel Islands, we can see a significantly higher overlap with offshore waters, namely due to the federal sections

of these MPAs. However, even with this significantly larger offshore encroachment, almost no pelagic allowed areas exist. Whether this difference was due to the Channel Islands process pre-dating the coastal process and the 2008 MPA Master Plan's outlook on pelagic species is up to debate, but the fact of the matter is the difference is noticeably present, and for no abundantly clear reason.

Recommendation: The subject of island MPAs allowing pelagic take, specifically these three, has been raised by the public several times prior at our meetings, and local MPA collaboratives our commissioners have attended. For these reasons, and those above, this commission supports this petition, and believes it should be accepted by the State Commission through one of the proposed "options" the petition lists that best fits the existing network.

Petition2023-18MPA

Petition2023-18MPA requests multiple changes to a variety of coastal and island MPAs within the county. Some of the changes are listed as "non-regulatory requests" by the Department while others make modifications to, or remove existing MPAs. All but one of the MPAs in the petition are within the County, they are the: Vandenberg SMR, Point Conception SMR, Kashtayit SMCA, Campus Point SMCA, and San Miguel Island Special Closure.

Of the changes, the proposal at Vandenberg SMR and San Miguel Island Special Closure are the two MPAs that would have the largest regulatory changes. At Vandenberg the petition requests a coastal SMCA be made that allows for only shore-based fishing by hook-and-line, citing an equity and enforcement concern between military base personnel and members of the public. Because military personnel are allowed to fish the shore of the SMR while members of the public outside the base cannot due to the SMR, both the equity and enforcement concerns are certainly present and should be addressed. The proposed solution of a shore based SMCA does seem to be a reasonable way to correct this problem.

At San Miguel and Anacapa (outside of the county) the petition requests the Special Closure(s) be removed in its entirety citing its original goal being to reduce disturbance to pinniped rookeries and seabird populations has been far exceeded and better methods have been developed on-site.

The remaining MPA requests are non-regulatory and include supported use for M2 radar monitoring at Point Conception SMR for better enforcement, a refined regulatory language for allowances at the Kashtayit SMCA, and using the color red instead of purple for distinguishing the Campus Point No-Take SMCA.

Recommendation: This commission finds all of the above modifications and requests more than reasonable, gives its support for them all. We recommend the FGC accept the petition in full.

Petition2023-28MPA-AM

Petition2023-28MPA requests to create a new MPA around Point Sal, designating it the Point Sal SMCA or a Tribally named SMCA, and listing it as a limited-take area with only an exception of a shore based finfish take allowance and tribal take allowance. The petitions driving reasons for the new MPA are that the area is ecologically significant in terms of local upwelling and relative to the landings that occur there the area is a small fraction of the State's commercial output, under 1%. The petition also cites tribal inclusivity and significance in the area as justification for its closure.

While the petition is accurate in the broader economic analysis, locally Point Sal is a very important area for both recreational and commercial operations out of Port San Luis (Avila), the local port to Point Sal.

Point Sal, and its surrounding waters, are essential for year-round and seasonal fisheries such as salmon, dungeness crab, groundfish, and halibut. This new MPA in addition to the existing network will significantly affect the local port's economic health due to Point Sal's being a significant fishing area for local commercial and recreational anglers. Namely, crab and groundfish boats out of Avila would be significantly affected by this change as per their testimony, over half their time is spent in the proposed area.

Recommendation: While the shore-based allowance is a welcome allowance, we believe this is still too costly on the local economy of Avila and its recreational and commercial fisheries to warrant its allowance. For this reason this commission has decided to be against this petition, and recommends the FGC deny it.

Petition2023-29MPA-AM

Petition2023-29MPA requests to create a new MPA around Carpinteria, designating it the Mishopshno SMCA. The petition asks to make take regulations for the area the same as the Point Sal petition, with an allowance of shore fishing of finfish and a tribal exception for those in the federally recognized Santa Ynez Band of Chumash Indians which would be able to still use tribal take methods inside of the SMCA. The proposed area's size was reduced when the petition was amended to include the shore allowance.

The petition's primary reasons for this MPA include this tribal allowance and co-management model along with the added reasons of MPA connectivity, spacing, and protecting juvenile great white shark nursery grounds. While this commission does agree that Tribal inclusion is a warranted piece of MPA and coastal management, we do not believe that a new MPA altogether is needed to accomplish this. MPAs across the coast can be modified themselves to allow for such co-management but the existing area offshore Carpinteria is currently open to the entire public, Tribes included.

Carpinteria's coast has been the subject of several MPA proposals over the years. During the MLPA the same area was looked into but was ultimately not selected, trading off two other SMCAs instead of establishing one at Carpinteria in a separate MLPA planning alternative. In 2020 this commission also followed a similar MPA petition in a smaller area to the current proposal that similarly advocated to protect juvenile great white sharks. That petition was ultimately rejected by CDFW due to the larger footprint white sharks, a pelagic species, covered relative to the coast of Carpinteria/California in general, and we believe the same reasons from 2020 are still relevant in 2024 against the petitioner's arguments.

Additionally, it should be said that Carpinteria Reef, the reef that would be almost entirely inside the MPA, is one of the last open reef areas to the fishing community. Removing this reef will see the end of local fishing access to coastal reefs, forcing anglers to travel further, coastally or to the islands, and burning more fuel to have similar opportunities. Commercial members of this commission are concerned for the areas of the proposed MPA that overlap the state halibut trawl grounds. These grounds are minimal already and have been reduced continuously over the years. This proposed MPA would cut a significant portion of the current open trawl area harming this unique fishery that the commission has repeatedly stated is well managed. Lastly, there is an overwhelming amount of public outcry on this petition specifically citing lost access to one of the last open reefs on the coast by boat and especially kayak.

Recommendation: For all of these reasons this commission has decided to be against this petition, and requests the FGC deny it.

Petition2023-33MPA-AM

Petition2023-33MPA requests for multiple MPA expansions and one MPA creation throughout the California coast, of which, three MPA expansions are within Santa Barbara at the Point Conception SMR, the Gull Island SMR, and the South Point SMR. Of the three expansions the South Point SMR expansion would be the largest, including all of the southwest side of Santa Rosa Island in the MPA and adding over 27.5 square miles to the SMR. This is followed by Point Conception SMR's expansion eastward adding over 14 more square miles to the SMR, and lastly by Gull Island SMR's smaller northward expansion adding over 1.5 square miles to the closure.

The driving force behind Petition2023-33MPA is kelp restoration. The petition claims growing these MPAs would allow for the now protected areas to rebuild their kelp forests under no fishing pressure which would also mean less traffic in general. Kelp restoration is a very important subject in Santa Barbara County as several sectors, consumptive and non-consumptive, depend on healthy levels of kelp for commercial and recreational use. That being said, this commission believes removing fishing access in these areas will do little to nothing to promote kelp regrowth and more-likely prevent kelp rebuilding projects (seeding, artificial reefs, and sea urchin removal programs) from directly assisting in the rebuilding of our kelp forests. Besides fishing, factors such as water quality, water temperature, storms, and swell need to be considered as larger drivers of kelp loss, not larger closed areas. There are several active projects locally and statewide dedicated to kelp rebuilding, none of which remove fishing access from areas in order to rebuild the kelp because there is no reason to. We believe the same applies in the areas this petition looks at. There are no reasons these specific areas need a fishing closure to help kelp forests regrow; therefore, there is no justification for their expansion, especially into waters predominantly too deep for kelp to root and grow. Similar to petition 29, there has been specific public outcry against this petition for all of the above reasons at MPA collaboratives, and public meetings.

Recommendation: For these reasons this commission has decided to be against this petition and recommends the FGC deny it.

Signed, the Santa Barbara County Fish and Wildlife Commission,

Phil Beguhl (Chair) - 2nd District

Scott Cooper (Vice Chair) - 3rd District

Frank Abatemarco - 1st District

Chad Thomas - 4th District

David Morgan - 5th District

Jeff Landers - Santa Maria Sportsman's Association Representative

Whitney Uyeda - Santa Barbara Sport Fishing Representative

Jeff Maassen - Commercial Fisherman Representative

Steve Adam - Santa Ynez Valley Pistol and Bow Club Representative

County of Santa Barbara
PLANNING AND DEVELOPMENT
North County
624 W. Foster Road, Suite C
Santa Maria, CA 93455-3623

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Ms. Melissa Miller-Henson Executive
Director
California Fish and Game Commission

715 "P" St. 16th Floor
Sacramento, CA 95814

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DEPARTMENT OF THE AIR FORCE
AIR FORCE CIVIL ENGINEER CENTER
JOINT BASE SAN ANTONIO LACKLAND TEXAS

Dec 8, 2025

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

via e-mail to fgc@fgc.ca.gov

Subject: DEPARTMENT OF AIR FORCE SUPPORT FOR 2023-28MPA-AM Point Sal SMCA

Dear Dr. Zavaleta, President
California Fish and Game Commission

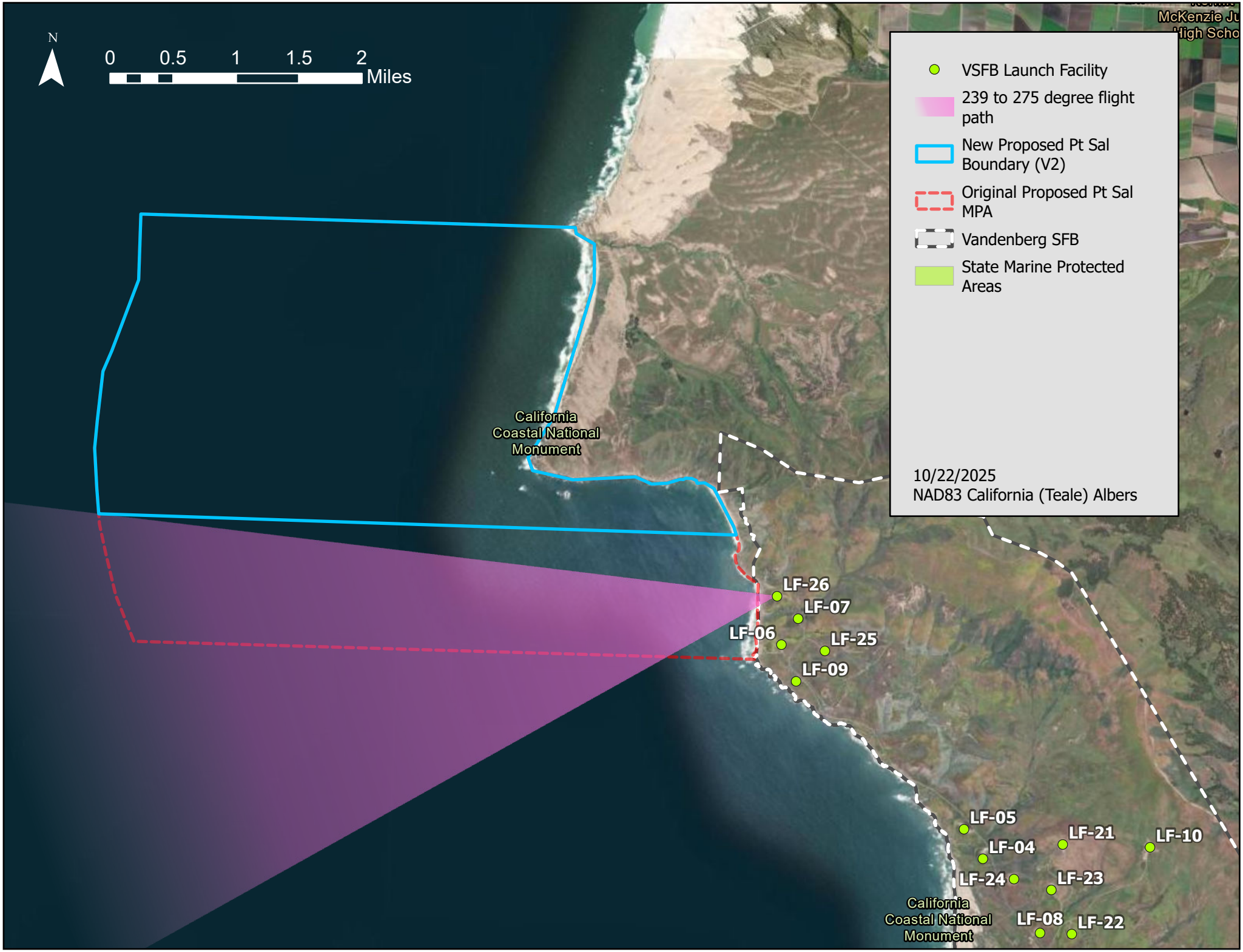
Thank you for the opportunity to comment on the 2023-28MPA-AM Point Sal petition submitted by the Natural Resources Defense Council (NRDC. As the Department of the Air Force (DAF) Regional Environmental Coordinator (REC) in U.S. Environmental Protection Agency Region 9, I provide coordinated responses to various environmental policies and regulatory matters for the DAF.

Petition 2023-28 MPA-AM proposes to establish a new marine protected area (MPA) or State Marine Conservation Area (SMCA) off the coast of Point Sal. The original petition did not account for the Vandenberg Space Force Base (VSFB) space launch facilities and operations. Upon conferring with representatives from the NRDC the MPA boundary was adjusted to deconflict with VSFB assets while still enabling protection of marine life and respecting culturally important waters of Point Sal. The attached graphic reflects the boundary that VSFB concurs with. We want to thank the NRDC for this adjustment and thus can support 2023-28MPA-AM.

Sincerely,

DAVID C. BELL, PhD
DAF REC Region 9

Cc:
Darryl York, SLD 30 Environmental Chief
Jason Golumbfskie-Jones, DOD REC 9
Karla Meyer, AFCEC /CZTQ
Sandy Aylesworth, NRDC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VSFB Launch Facility
239 to 275 degree flight path
New Proposed Pt Sal Boundary (V2)
Original Proposed Pt Sal MPA
Vandenberg SFB
State Marine Protected Areas
10/22/2025
NAD83 California (Teale) Albers
California Coastal National Monument
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LF-06
LF-25
LF-09
LF-05
LF-21
LF-10
LF-04
LF-24
LF-23
California Coastal National Monument
LF-08
LF-22

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FAX (805) 485-4779

E-MAIL
Assemblymember.Bennett@assembly.ca.gov

Assembly
California Legislature

STEVE BENNETT
ASSEMBLYMEMBER, THIRTY-EIGHTH DISTRICT

COMMITTEES
CHAIR: BUDGET SUBCOMMITTEE NO. 4 ON CLIMATE CRISIS, RESOURCES, ENERGY, AND TRANSPORTATION
BUDGET
ELECTIONS
EMERGENCY MANAGEMENT
WATER, PARKS AND WILDLIFE

December 10, 2025

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

Re: Support for Petitions 2023-28MPA and 2023-29MPA

Dear President Zavaleta and Honorable Commissioners:

I am writing in 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 the Central Coast region's ocean-based economy thrives for decades to come. I urge you to approve these proposals.

Both the proposed Point Sal and Mishopshno MPAs 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. 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 hold 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. 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[1]. In 2024,

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

coastal tourism brought just over $1.7 billion in travel-related spending to Ventura County, directly supporting no less than 16,600 jobs[2]. Ventura Harbor is home-base for Island Packers Cruises: the go-to transport company between the mainland and Channel Islands National Park (CINP). CINP officials reported that in 2022, 323,000 tourists visited the National Park, spending almost $22 million in neighboring communities, with a cumulative benefit to the local regional economy of $31.9 million[3].

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 our strong support for these proposals that aim 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,

Steve Bennett

Assemblymember Steve Bennett
38th Assembly District

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

[3] Tourism to Channel Islands National Park Contributes $31.9 million to Local Economy
https://www.nps.gov/chis/learn/news/pr082523.htm

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FAX (805) 965-0701

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300 E. ESPLANADE DR., STE. 430
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FAX (805) 988-1945

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SANTA MARIA, CA 93454
TEL (805) 346-2845

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California State Senate

SENATOR
MONIQUE LIMÓN
TWENTY-FIRST SENATE DISTRICT

DEMOCRATIC CAUCUS
CHAIR
LEGISLATIVE WOMEN'S CAUCUS
VICE CHAIR
CENTRAL COAST CAUCUS
VICE CHAIR
COMMITTEES
NATURAL RESOURCES & WATER
CHAIR
BANKING & FINANCIAL INSTITUTIONS
ELECTIONS & CONSTITUTIONAL AMENDMENTS
ENERGY, UTILITIES & COMMUNICATIONS
HEALTH
HUMAN SERVICES
TRANSPORTATION
JOINT LEGISLATIVE COMMITTEE ON CLIMATE CHANGE
JOINT LEGISLATIVE COMMITTEE ON EMERGENCY MANAGEMENT
JOINT COMMITTEE ON RULES

December 12, 2025

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

Re: Support for Petitions 2023-28MPA

Dear President Zavaleta and Honorable Commissioners:

I am writing in support of the proposed Point Sal State Marine Reserve (Petition 2023-28MPA) near the city of Guadalupe. Conserving this area will help protect and restore ocean health, enhance coastal recreation, and support the coastal economy of Santa Barbara County thrives for decades to come.

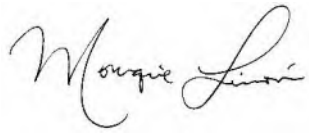
The proposed Point Sal Marine Protected Area (MPA) would conserve habitats that support rich biodiversity, such as kelp forests, tidepools, migratory whale corridors, a larval retention zone, and a seabird and sea lion rookery. Protecting these areas would have positive impacts that spread beyond their boundaries, bolstering ocean resilience and keeping our coastal waters healthy.

This area also holds cultural significance for several Indigenous communities in our region. Designating this MPA would honor and strengthen the Indigenous stewardship of the area and elevate their historical and present-day connection to the region.

Additionally, this area is important for ocean and coastal recreation activities. Public access to coastal recreation is limited along this area of the Central Coast. Point Sal is home to coastal bluff trails frequented by local hikers and tourists who come to view wildlife, relax at the beach, and enjoy this remote and pristine area. This also benefits our economy – collectively, ocean-based recreational activities contribute to the $28 billion ocean tourism and recreation economy of our state.

The continued work of the Commission to protect the biodiversity of our state is critical. As such, I request your full and fair consideration of this proposal.

Sincerely,



MONIQUE LIMÓN
Senator, 21st District

From: Matthew Bond <[redacted]>
Sent: Monday, January 19, 2026 8:11 AM
To: FGC <FGC@fgc.ca.gov>
Cc: Tonie Bangos <[redacted]>; Devin O'Dea <[redacted]>; Christopher Killen <[redacted]>
Subject: Comment Regarding MPA Petitions for the February 11-12, 2026 Commission Meeting

Dear members and staff of the California Fish and Game Commission,

Please find attached our letter representing the voice of a broad coalition of individuals, organizations, businesses, and scientists with opinions and related rationale on each of the Bin 2 MPA petitions.

Thank you for your time and service,

Matt Bond
Allwaters Protection and Access Coalition

January 2026
Coalition Letter on Bin 2 MPA Petitions

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To the California Fish and Game Commission (FGC) and Department of Fish and Wildlife (CDFW),

This letter serves as a joint comment, representing a mass consensus reached by the undersigned groups and individuals representing tens of thousands of stakeholders from recreational, commercial, and scientific backgrounds on all of the Bin 2 MPA petitions. While some of us may submit our own individual comments in addition, or have already, we would like the FGC and CDFW to understand that this diverse community of statewide stakeholders are all united regarding the following comments on these petitions. We all would like to share our common beliefs outlined in the below letter to you as this united group. With the adaptive management process of our MPA network underway, we ask to please take the below input deeply into account when determining the outcomes of the following bin 2 MPA petitions.

Petition2023-14MPA – Accept

Petition 14 proposes the allowance of commercial urchin take inside of a group of SMCAs that already have allowable limited-take restrictions, with the exception of one no-take SMCA. This petition has not been amended since submission. We believe this petition's rationale to have enough merit to warrant its acceptance in part or in full.

At a time where there are mass interests in helping kelp forests regrow, allowing sea urchin take in areas already partially open to other fisheries is a minimally invasive step we can take, especially in SMCAs that already allow some forms of take. By being allowed to harvest and remove sea urchins that are currently protected in these areas, we allow the kelp the chance to grow back. While we cannot locally control global factors affecting kelp growth such as water temperature or swell meaningfully, we can still promote regrowth of kelp by being allowed to at least remove one of kelp's largest predators, the sea urchin.

Per SeaSketch, we may accept this petition whilst also maintaining the same relative level of protection (LOP) in six of the eight total SMCAs in the proposal: Double Cone, Salt Point, Stewarts Point, Sea Lion Cove, Naples, and Anacapa. This means any MPA connectivity benefits will be maintained as is in the current network. For the Point Dume and Point Vicente SMCAs, while the MPA LOP does drop, we believe the allowance of sea urchin take in these SMCAs will greatly benefit the entire area through restored kelp growth, and additional workable area for local urchin divers. However, we understand if a loss in connectivity for these two areas is something the commission is against, that just these two MPA be excluded. At a minimum, this petition should be granted for the SMCAs where the network as a whole does not lose any existing connectivity benefits.

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Petition2023-15MPA-AM2 – Accept

Petition 15 proposes allowing limited take of pelagic or highly migratory species at three joint State-Federal MPAs at the Channel Islands. The petition was amended twice, and proposes several possible options for limited-take of pelagic finfish or highly migratory species (HMS). The petition brings forward three gear types: hook-and-line, spear, and harpoon swordfish; additionally, it includes possible nearshore-offshore MPA options to mitigate bycatch in the more biodiverse nearshore areas and maintain high MPA LOPs for network connectivity. While it is up to the commission and department to determine what the best combination of choices may be, we all believe this petition should be accepted under a preferred option that retains a high LOP for these MPAs, maintaining existing ecosystem level protection/connectivity, that consists of an offshore SMCA and nearshore SMCA or SMR.

The petition is founded on a longstanding scientific basis and MLPA goals that the MPAs in our network are primarily intended to benefit our nearshore waters and non-pelagic species the most. This has been established since the MLPA MPA Master Plan (MMP) in 2008 where MPA benefits to pelagic species were explained to be weak at best, rather focusing the network toward non-pelagic species that benefit the most from MPAs per the MMP documents. This led to the coastal network outside of the Islands process allowing some form of pelagic access in over 40% of our existing MPAs, and no-take in the remaining 60%. Of the currently 60% of MPAs that are no-take, most areas are nearshore, cover predominantly shallow water, and would not provide much pelagic benefits if they were even partially open. The approximately remaining 40% of the network that is limited take, most of which is pelagic take, are set in areas where pelagic effort is reasonable enough to avoid any nearshore or bottom interactions, or does not allow hook-and-line, just spear.

This sets a clear precedent, based on the science, that we can allow reasonable pelagic fishing access in the areas where it makes sense to allow it, and fully protect areas where pelagic fishing is less realistic or interferes too much with nearshore areas. This precedent was again reiterated in the 2016 MMP in a regional objective that explicitly states to allow for forms of pelagic take across the network in all bioregions, something the coastal MPA phases included but the Channel Islands network specifically lacks. The commission then upheld this mass precedent in 2020 when it denied a petition to create an MPA for white sharks, citing specifically that MPAs in our network are not meant for highly migratory or pelagic species, they are for ecosystem level protections, which can still exist in pelagic allowed MPAs. We simply ask that this precedent continue to be upheld for the MPAs that can reasonably allow for pelagic or HMS take and network maintain connectivity. This has no better use case to be applied than at the Channel Islands. That region of the network was designated prior to all of the primary MPA guiding documents, covers mostly offshore waters, and provides the least pelagic access of all the MPA designation regions, a clear case of adaptive management.

Because the Channel Islands MPA network is the oldest region in the modern network, designated now over 20 years ago in 2002, it pre-dates the coastal MLPA implementation phases, the MLPA LOP frameworks, both MPA Master Plans, and all other frameworks and processes that established this pelagic allowance elsewhere during the 4 coastal phases. In the early 2000s during the Channel Islands process, the primary concerns driving the island MPAs involved groundfish species and recovering their overfished populations. This fact was a main driver in justifying the federal sections of the island MPAs, as the federal expansions cover deep water rocky bottom or reefs where groundfish frequent. Today, federal outlooks of no-take MPAs are almost non-existent. With the exception of the Channel Islands, federal protected areas off the west coast only protect non-pelagic bottom dwelling species (groundfish), and allow pelagic fishing access, aligning exactly to what the petition proposes.

We believe this to be an adaptive management case of modernizing MPAs that predate all guidance documents, and updating them to better align to these well established frameworks in the same way the rest of the network already has. In the case of pelagic access, this shift is clearly seen as the more-modern coastal MPAs allow significantly more pelagics access (40%), compared to the Channel Islands MPAs (3%). In the case of The Footprint MPA specifically, it is the only MPA in the State that is disconnected from land, is entirely deeper than 50m, and has no limited take allowance for pelagics. The Channel Islands MPAs as a whole are justifiably the most equipped to handle pelagic allowance in them, especially offshore, due to the depths covered allowing a massive buffer between pelagic fisheries in the mid to upper water column and non-pelagic fisheries on the bottom. Any take beyond State waters in the federal portions of these MPAs would affect the nearshore region even less than already existing State pelagic allowances present in the current coastal network. Most of the federal portions of these MPAs are well over 1000 feet in depth, and in some cases over 4000 ft in depth.

Per SeaSketch, LOP tiers from the original MLPA state pelagic take maintains MPA connectivity due to the take allowance’s high LOP in offshore waters. At the islands specifically this is seen as only allowing hook-and-line take in waters deeper than 50 meters (164ft), with harpoon or spear gears allowed anywhere due to their high selectivity and lack of any bycatch. A high LOP can be maintained and connectivity still upheld if the petition is accepted with the proposed “nearshore” SMCAs or SMRs at Gull Island and Santa Barbara Island that restrict nearshore hook-and-line, along with any SMCA option in The Footprint and the proposed “offshore” sections of Gull Island and Santa Barbara Island. With all of this precedent and SeaSketch LOP information in mind we believe there is more than sufficient rationale, federal and state evidence, and MLPA/MMP support to allow for this adaptive management change.

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Petition2023-16MPA – Modify then Accept

Petition 16 requests the allowance of the commercial take of salmon by troll in two SMRs in the northern bioregion, Bodega Head and Stewarts Point, making them SMCAs. The petition argues similarly to petition 15, on the lack of interference allowed pelagic access would cause. While we do stand by this petition's core arguments, we also believe that this allowance should be accompanied with a similar recreational allowance of salmon by troll in these MPAs too.

Recreationally or commercially the salmon troll fisheries mirror each other with similar gear use, lack of gear conflicts with unintended species, and lack of interactions with the bottom environment due to the nature of the troll gear always moving and being in the upper section of the water column. There are no reasons to not allow recreational troll access in these areas as well because of this. This is further supported by the bordering and nearby pelagic allowed SMCAs in the area giving both recreational and commercial allowance for salmon trolling. A joint allowance would also help to solve any possible confusion on the water of only a specific group being able to troll in the area while others may not, reducing any possible enforcement problems.

Per SeaSketch, the LOPs of these areas as SMCAs allowing any kind of salmon trolling retains existing MPA protections for their respective connectivity benefits. While these MPAs in the northern bioregion are more-modern of MPAs, coming after initial MMPs, MPA frameworks, and processes, unlike those in Petition 15, we see this change allowance as reasonable for consideration. With the recreational troll allowance added to this petition, we see its arguments as more equitable and in-line with existing MPAs in the surrounding northern bioregion of the network.

Petition2023-18MPA – Accept

Petition 18 makes several requests across the Santa Barbara Channel to 6 MPAs in total, and some requests were non-regulatory requests. We support all of the prescribed changes in the petition to better regulatory language, provide better MPA regulation clarity through color corrections, and to make fine tune changes to better the overall MPA network. Of all the requests in petition 18, the most controversial is the creation of a shore region SMCA in the Vandenburg SMR. This would be called the Vandenburg SMCA and would allow shoretake of finfish. This case of a shore allowance is a unique case for our MPA network, as the bordering military base with the SMR allows shore fishing already anyway. This shoretake allowance would clear up any enforcement confusion by the public for the SMR and give some access back to the public in general. We believe this petition's regulatory and non-regulatory requests should be accepted in full.

Petition2023-19MPA – Reject or Modify

Petition 19 requests the creation of a tribal co-managed SMCA at Morro Bay that only allows for the recreational take of finfish and invertebrates except rock scallops and mussels by hand harvest, also including a tribal take exemption within the SMCA. We believe the petition should be either rejected or amended to allow for more general recreational and commercial take as well.

We believe tribal co-management to be a great step forward in managing California's waters and should be present in all MPAs; however, creating a new MPA that restricts exclusively commercial groups and most recreational fishing access from such an essential area should not be warranted. The commercial blocks overlapping the proposed SMCA account for 6.2% of Morro Bay's landing revenue alone. More specifically, these blocks represent 25% of the area's squid landings, 8.8% of the groundfish landings, and 15% of the area's salmon landings, per the MFDE. While not an exact correlation, recreational access in the area is likely comparable (with the exception of squid) and will likely be equally affected in the MPA regions, as this petition affects all fisheries not involving direct hand harvesting.

Additionally, there is concern that the proposed offshore wind energy program has its proposed electrical lines connecting the Morro Bay power bank stations to the offshore array crossing through the SMCA. If passed, this would need to be addressed and an additional allowance added.

Petition2023-20MPA – Reject Nearshore and Clarify/Accept Offshore

Petition 20 requests changes to the MPA cluster, the nearshore and offshore MPAs, at Point Buchon. The petition requests the offshore SMCA allow the hand harvest of finfish and invertebrates except rock scallops and mussels, allow the maintenance of artificial structures under the correct permits, and provide a tribal take exemption for federally recognized tribes. However, it is unclear if these requested allowances to the offshore SMCA at point Buchon are replacing or adding to existing recreational and commercial allowance for the take of albacore and salmon. Pursuant to the allowances being additive and not replacing the existing take allowances in the offshore MPA we support the request for the offshore region of the MPA cluster to have the added take allowances. This example in the offshore region is a clear example of how tribal components can be added to the existing network, not requiring creation of more MPAs to involve tribes.

Regarding the petitioner's request to the nearshore SMR being expanded, we believe this request should be rejected. The expansion of only the SMR section of the Point Buchon nearshore/offshore cluster would unnecessarily remove all access from the added area. The justification for this addition comes from MPA Collaborative meetings citing enforcement concerns, stating that moving the northern boundary to the physical

point will provide a better reference for enforcement. The core reason the existing MPA does not go to the physical point on land is because the nearest whole decimal degree value was used as the northern boundary instead, following MLPA guidelines. This usage of a round Lat/Long number for an MPA that does not experience much shore fishing opportunity is supported by the MLPA MPA design criteria to explicitly help, not hurt, enforcement. The current northern boundary gives those fishing beyond shore an easy to understand GPS reference point to know where the boundary is. Additionally, expanding only the nearshore SMR may cause further enforcement problems with the offshore SMCA remaining its original size. The expansion of the nearshore only leads to a case of an unevenly sized MPA in the nearshore and offshore regions.

Petition2023-21MPA – Accept

Petition 21 requests the Pyramid Point SMCA in the northern bioregion be modified to remove its existing recreational allowances for take of surf smelt and give additional tribal exemption to the Tolowa Dee-ni' Nation on top of its existing tribal exemption. The petition also requests the border of the MPA be moved south to the true CA-OR state boundary line, slightly shrinking the MPA.

While this petition does remove some recreational access to take surf smelt, that access was already relatively limited and small scale. The change to the border to shrink the SMCA to align to the actual state border clears up any possible confusion or issues the overlap currently causes. Overall we are supportive of this change, and addition of another Tribal component to the existing Pyramid Point SMCA.

Petition2023-23MPA-AM1 – Reject or Modify

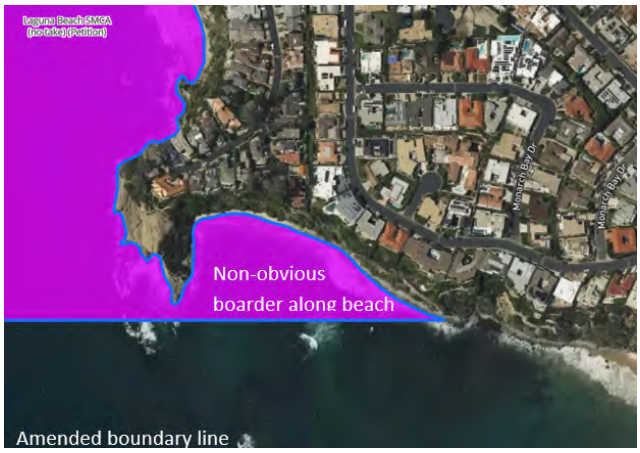
Petition 23 requests multiple changes to 3 existing SMCAs, the Carmel Bay SMCA, Pacific Grove SMCA, and the Edward F. Ricketts SMCA, requesting all three SMCAs become closed to take of finfish during “active kelp restoration permits” and to create a new SMR at Tankers Reef, the area of this SMR was reduced during amendments.

We believe the petition has reasonable goals, restoring kelp, but goes about this in the incorrect way. Regarding the specific MPA changes requested, we believe this petition should be rejected or modified. Acceptance would come at the additional loss of recreational fishing access to these SMCAs. Fishing has no significant impact on kelp restoration compared to environmental factors (e.g., water quality, water temperature, swell) and would be closed when a “kelp restoration permit is active.” This also raises further enforcement concerns as regulations would effectively be in constant flux depending if a permit is active or not, there would need to be new paths created to inform all on the water when said permit is active or not. Additionally, existing restoration efforts at Tankers Reef would immediately stop if an SMR is designated there for the lack of allowable take inside of an SMR, even the reduced in size SMR.

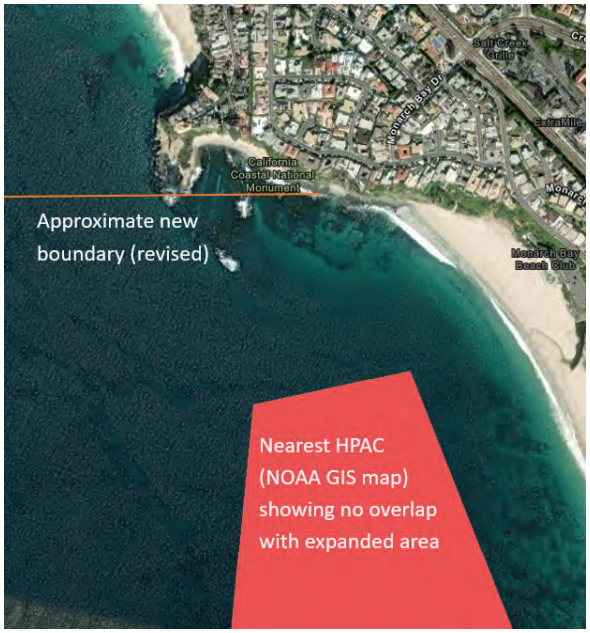
If the petitioner wishes to accomplish the outstanding goals of this petition, then a similar approach to that in Petition2023-14MPA should be considered. Such an approach could consist of keeping the 3 SMCAs as SMCAs with the same allowable take regulations, but only adding a new allowance for the recreational and commercial take of sea urchins, removing the finfish closures during "active permits." Regarding Tankers Reef, we believe no MPA, SMR or SMCA, should be designated there as existing restoration efforts would be able to continue there without requiring any closures or special allowances be made inside of a new MPA. Leaving Tankers Reef as is will also allow any future restoration methods to be deployed at the location without having to modify the SMCA allowances again as we continue to learn how to restore our kelp forests.

Petition2023-24MPA – Reject

Petition 24 requests expanding the existing Laguna Beach SMCA into the Dana Point SMCA. We believe Petition 24 should be rejected for several reasons. Petition 24's core argument claims enforcement concerns of the MPAs by lifeguards, when in fact, the primary enforcement of the MPAs is warden officers. Wardens are the only individuals that may issue citations for MPA compliance and are most notably, not bound by city limits. The idea of moving this border to allow for better enforcement will only create more of an enforcement problem due to where the proposed border lies versus the existing one. The existing border of the Laguna SMCA and Dana Point SMCA is a rocky point, a physical barrier between two areas. This allows the border to be clear as it is marked by an obvious, physical landmark, this is a guiding objective of the MLPA in MPAs that justifiably have a large shore fishing presence. The proposed new border would sit along the mean high tide line in the middle of a rocky beach. Simply put, removal of a physical barrier landmark to an invisible line on a public beach would only create more of an enforcement compliance problem, not reduce it along shore. (See Below images)



The petition then cites the Sustainable Fisheries Act of 1996 and its 2002 update where essential fish habitats (EFH) and habitat areas of particular concern (HAPCs) were designated along the west coast of California, Oregon, and Washington.



Essential fish habitats (EFHs) are defined by NOAA as areas where specific fish species, including groundfish, pink salmon, king salmon, coho salmon, coastal pelagic species, and highly migratory species, can feed, spawn, or grow to maturity. These habitats are extensive, the three EFHs overlapping the proposed expansion area—groundfish, CPS, and HMS—cover the entire coast of California, Washington, and Oregon. Because of their broad geographical scope, EFHs alone do not indicate a need for MPAs off the coast, or this proposed expansion.

Habitat areas of particular concern (HPACs), as the name implies, are sections of the EFH that are more important in providing the ecological functions that the general EFHs offer. These are more selective in their designation and display highlighted areas of concern within the EFHs. While these areas are more important in participating in these biological processes, the petitioner's proposed MPA expansion does not overlap with any existing HPACs (see above image). The arguments of the petition involving any EFHs or HPACs to protect this additional area are irrelevant for these reasons.

The petition additionally presents a rationale similar to that of Petition 2023-33 regarding the protection of kelp beds. It claims that conserving these areas is essential for the health of kelp forests. However, like the counterarguments we will see in Petition 2023-33, it is important to note again that fishing effort and so-called “anchor drag” does not significantly reduce kelp biomass; rather, factors such as water temperature, water quality, and swell conditions primarily drive changes in the kelp population. Additionally, any concerns raised in the petition about “anchor drag” damaging kelp beds would equally apply to non-consumptive vessels, not just fishing boats.

The petition references the Marine Mammal Protection Act (MMPA) concerning potential marine mammal entanglements from lobster traps in the area. While recreational and commercial lobster fishing occurs in the region, there have been little to no reported entanglement incidents involving whales or dolphins locally, showing in reality there is little need for concern. While it's important to acknowledge the possibility of such events, the absence of previous occurrences suggests that the likelihood of entanglements is extremely low. Furthermore, if the area were to be protected, lobster traps would simply be relocated, meaning the risk of entanglement would persist

regardless of where the traps are ultimately placed. Lastly, the adoption of ropeless fishing technologies, such as those developed by Sea Sonics, indicates a future where entanglement issues could be further mitigated.

Concerning the MLPA itself, it should be noted that the proposed expanded area would give the MPA an “L-shape.” This shape is specifically called out in the MLPA as a poor MPA design for enforcement and is just another reason we have concerns for this petition.

Petition2023-27MPA-AM1 – Reject

The original petition 27 and its amendments only look at lobster taken from the Anacapa SMCA. We believe this request should be rejected. Petition 27, similar to petitions calling for protections to increase kelp beds, calls for additional protections at the Anacapa Island SMCA, the difference being that 2023-27’s focus is on eelgrass, not kelp. While a trap sitting on the bottom does have a larger footprint than a pelagic hook and line configuration which is also allowed in the SMCA, traps fished in the area are not significantly impacting eelgrass beds due to there already being a 20 foot depth closure for traps around Anacapa in its Special Closure. This area contains already a large amount of the existing eelgrass beds as the SMCA and special closure overlap making the key rationale of this petition redundant as protections are effectively already in effect.

Petition2023-28MPA-AM1 – Reject

Petition 28 requests the establishment of a new MPA around Point Sal. This MPA would significantly impact local fisheries, recreational and commercial, despite the petitioner's claim that the effects would be minimal. For this primary reason we believe the petition should be rejected, even as amended to allow for shore based take of finfish.

The petition includes an economic analysis of the proposed area but overlooks the devastating local impacts this MPA would have economically. While the petition accurately states that the overlapping commercial fishing blocks contribute to 1.1% of the central coast's total landings by value, it fails to consider the actual local implications of that 1.1% and what it represents. Using the same time range (2012 to 2022) on the MFDE, the local port nearest to the proposed MPA, Port San Luis/Avila, derived 28.12% of its total commercial revenue from the overlapping blocks 631 and 632. More specifically, 25.92% of the port's groundfish revenue and 57.79%, over half, of its crab revenue came from these areas. If recreational effort even somewhat mirrors commercial effort in the area, not only is Point Sal relevant commercially, but recreationally too offshore. Establishing an MPA at Point Sal will significantly harm the community of Avila and other nearby ports, threaten local businesses, harm or remove

people's sources of income, and remove recreational and subsistence access to the area by boat.

Providing shore based take of finfish would allow for beach anglers to continue fishing as they have been, but would do so at the loss of all offshore activity. More notably, this also results in a drop of the LOP of the SMCA to moderate-low. This LOP ranking per the MLPA fails any connectivity requirements making the final proposed SMCA a protected area that does not add to total MPA network connectivity. This brings into question the main argument of the petitioner to add this MPA in order to maintain MPA connectivity, as the final amended SMCA would not accomplish this.

<u>Petition2023-29MPA-AM1 – Reject</u>

Petition 29 requests a new MPA be created at Carpinteria. This MPA would be a tribally allowed SMCA that would be closed to non-federally recognized tribal fishing (general recreational and commercial fishing); the petition was amended to reduce its overall size and allow shore-based take of finfish. The petition's three primary arguments for the new SMCA are to meet habitat connectivity/MPA spacing requirements, to protect habitat surrounding juvenile white shark grounds, and to allow for tribal access. While tribal co-management of all California MPAs should be considered, we believe for the following reasons this specific MPA proposal should be rejected.

Regarding habitat connectivity, the petition asserts that the spacing of the existing MPA network exceeds the recommendations set by the MLPA scientific advisory team, which suggests a minimum spacing of 31 to 62 miles. The petition argues that the nearest coastal MPAs, Campus Point and Point Dume, are too far apart, claiming they are separated by 63.8 nautical miles or 73.4 miles (Image 1).

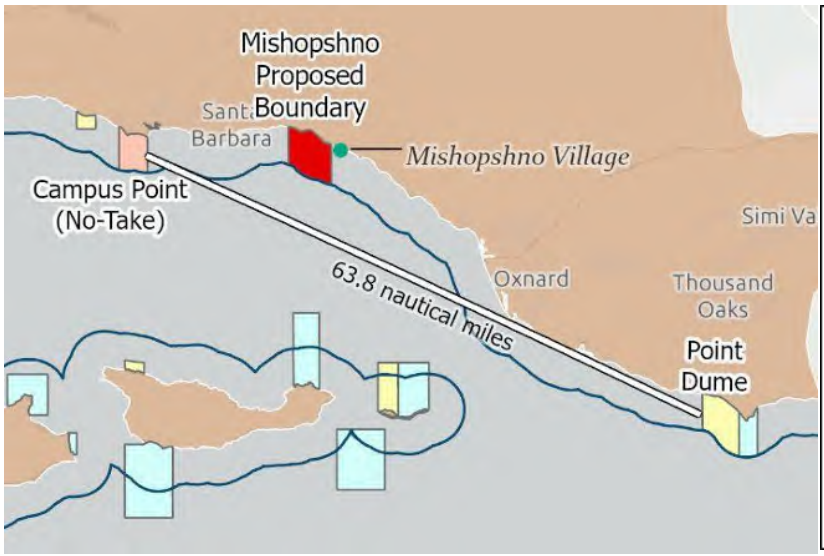


Image 1: Petition 29's image displaying proposed area and <u>claimed</u> spacing between existing Pt. Dume and Campus Point SMAs to be 63.8 nm (73.4 mi), which, if true, would exceed the southern MLPA MPA spacing requirements.

Note: the shown MPA is the original, pre-amendment size.

Discussions with the CDFW clarified that MPA spacing is measured by the, “shortest distance over water between two MPAs.” When measuring the distance between Campus Point and Point Dume, we find that it is in fact less than 62 miles, indicating that the current spacing distribution is adequate along the coast (see below Image 2).

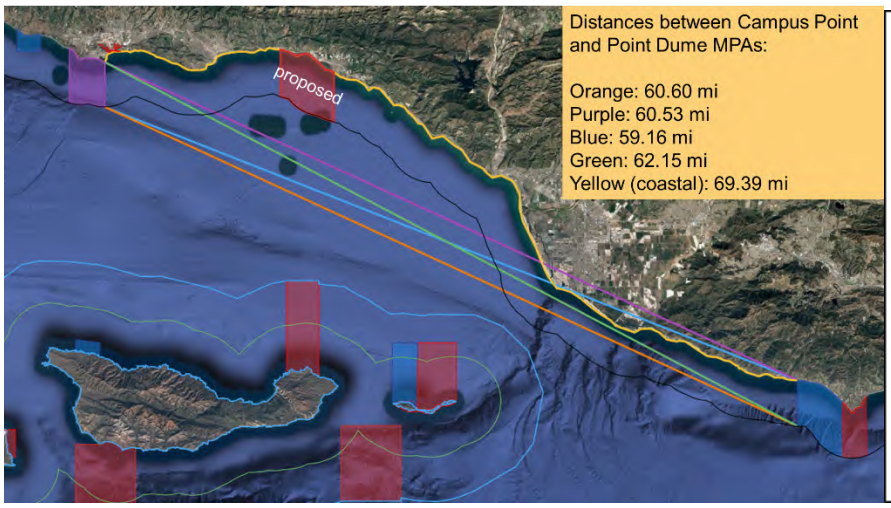


Image 2: Actual spacings between nearest existing MPAs around the proposed site. All but one straight line measurement exceeds 62 miles. The length that would be used by CDFW according to their provided input would be 60.60 mi (orange line) which falls within the spacing requirement.

Following the CDFW and MLPA guidelines, the shortest water distance between the two existing MPAs is ~60.60 miles, viewable by the orange line. This distance falls within the 31–62-mile MLPA spacing requirement. None of the provided measurements, including a measurement along the coastline (yellow) exceeded 73.4 miles of separation as the petitioner claims, again bringing into question the purpose for the new MPA if connectivity is already met.

In addition, the provided shore based take of finfish does allow for some form of recreational take but this now raises connectivity concerns. As mentioned in previous petitions, allowance of shore fishing of finfish reduces an MPAs LOP to moderate-low, losing its MPA connectivity with the network, this is confirmed by SeaSketch. Connectivity was a major reason for this MPAs proposal. With connectivity now lost due to these allowed take methods begs to question the purpose for this implementation in the first place if its foundational goals are not even accomplished. The LOP chart for the southern bioregion, moderate low protection is provided below.

	Mod-low	**SMCA SMP**	**Shore fishing** (H&L, hoop net); **kelp bass, barred sand bass, lingcod, cabezon, and rockfish** (H&L, spearfishing); **sheephead** (H&L, spearfishing, trap); **spotted sand bass and halibut** (H&L); **lobster** (trap, hoop net, diving); **urchin** (diving); **rock crab and Kellet's whelk** (trap); **catch and release** (H&L-general) **In water depth <10m: Catch and release** (H&L-single barbless hooks and artificial lures) **In water depth <50m at islands and <30m on mainland: pelagic finfish, bonito and white seabass** (H&L);

Regarding the protection of juvenile white shark nursery grounds, a similar petition was submitted in 2020 (Petition 2020-012 AM1) to close off a smaller section of beach at Carpinteria for the same purpose. Like Petition 29, this earlier petition aimed to protect

juvenile white sharks within the currently proposed area. This 2020 petition was rejected by the Department and the Fish and Game Commission (FGC), which stated that MPAs are designed to protect nearshore ecosystems rather than individual species, especially highly migratory species like white sharks. Given that this issue was previously addressed at the same location just four years ago, the same arguments against the current petition apply today regarding white sharks.

Lastly, regarding the tribal access portions of the petition, while tribal access and co-management should be explored across the entire MPA network, current access to the area by tribes is not limited in any way. Regardless of a tribal MPA designation or not, federally recognized tribes will have access in the area just like the public. Closing this area off to all groups except those of the federally recognized Santa Ynez Band of Chumash Indians would have the additional side effect of restricting any non-federally recognized tribes, as the petition does mention. In addition to the above counter reasons of the petition's primary claims, there exists additional effects to be considered at the proposed MPA site. The proposed area was considered during the MLPA for the southern section but was traded off for two other SMCAs on the coast, Naples and Kashtayit that were present in different MPA alternatives that Carpinteria was not in. If allowed, the new MPA would essentially break the agreements struck during the MLPA. Lastly, the pre- and post-amended boundaries overlap existing oil infrastructure that is maintained year round, no existing exemptions or conversations have been had regarding this infrastructure overlap. For these reasons we believe the petition should be denied.

<u>Petition2023-32MPA – Reject</u>

Petition 32 requests expanding the Duxbury Reef SMCA north, south and converting the SMCA into an SMR. The petition cites apparent drops in biodiversity in the areas, confusion on take regulations, and, as a result, high incidence of accidental poaching.

We believe this petition to be well intentioned but do not believe it should be accepted. The petition's claims that there was a local drop in biodiversity are all based on local surveys on no actual data displaying a measurable drop in the biodiversity in the area.

Observations by MPA Watch on potential MPA violations comes from observers seeing "anyone with buckets," citing even children with buckets counting as a possible violation. While it is understandable to ascertain data this way, we would like the commission to understand that someone simply with a bucket on one of the most popular beaches in the area does not mean they are violating MPA take regulations. This method of data collection possibly is why the self-reported values of possible violations at Duxbury are so high, when actual enforcement reports show infractions at Duxbury being so low they do not even make it to the yearly MRC report. Enforcement reports on MPAs from the yearly March MRC give insight into MPA violations in the state, of which Duxbury Reef never was in the top MPAs in violation (top 35) or top 5 in the northern region specifically in 2024 or 2025. Letters from partner agencies such as state and national parks as well as national marine sanctuaries all cite possible issues with the SMCA, all requesting it expand, but no agency goes so far as to support making the area an SMR. No hard data whatsoever has been provided to demonstrate a need to expand the SMCA to include these highly inaccessible areas in the north or south as well. The petitioner's claim that visitors walking through the existing southern border with legal catch from outside the SMCA is merely speculative. Access to the reef in this southern section is blocked by an inside channel except during extreme low tides, making further regulatory protection unnecessary and a niche case at best.

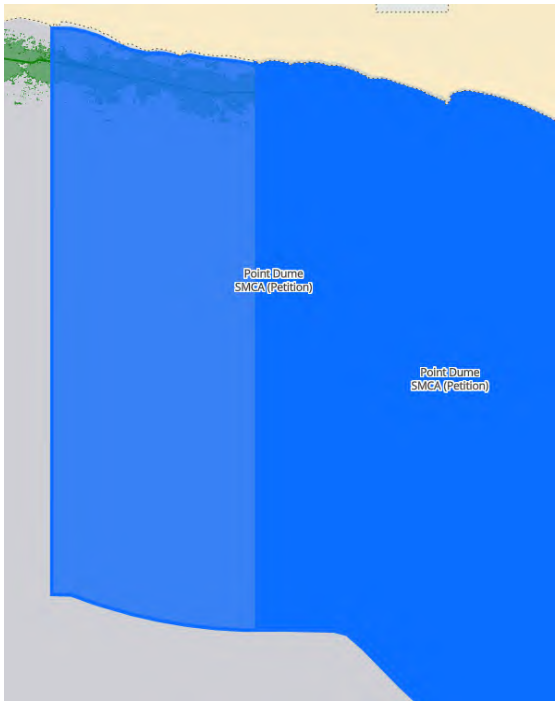
Regarding the original MPA expansion proposals, and even specifically the southern expansion (image above), the new covered area has a very asymmetric shape. This goes directly against MLPA guidelines for designating MPAs which state that MPAs with odd-asymmetric shapes are difficult to enforce and confusing to the public, possibly even adding to the confusions the petitioner claims is present at Duxbury. At the bare minimum, this border must be modified in a way that adheres to the MLPA MPA design guidelines before even being considered for final action. Because any possible additional area included or removed from the proposed expansion needs to be considered by all stakeholders, we must see what this final border actually is before providing further input. In December 2025, the petitioner did submit an informal request ("informal" was tagged by FGC staff) to change the border post-petition deadline, which could solve this odd shape issue. It is currently not known whether amendments like this can be considered. If the informal request is ultimately considered, the existing counter arguments still exist with exception of course of the expansion border shape.

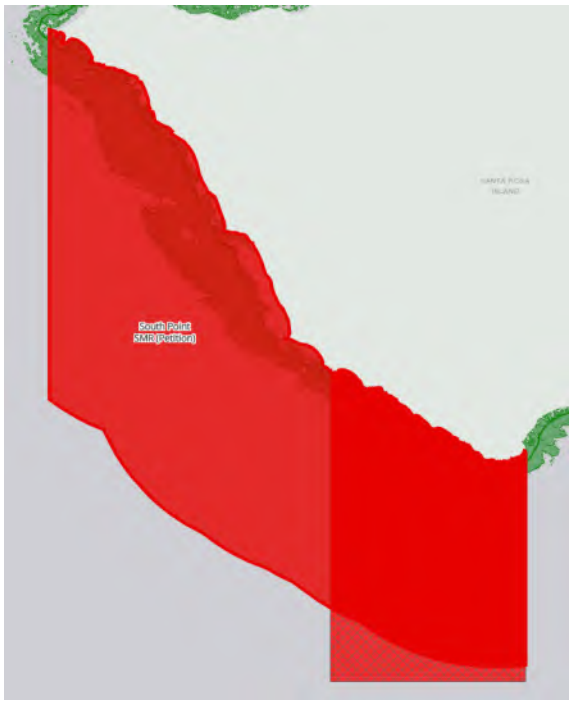
<u>Petition2023-33MPA – Reject</u>

Several groups and individuals have expressed opposition to this petition, and we all stand by the majority of their comments, even after the limited number of amendments to certain MPAs in petition 33. While there are various pathways for kelp restoration, the establishment of new or larger MPAs is not one of them. It is widely accepted that the growth and abundance of kelp are dependent on water quality and temperature. Even under ideal growing conditions, a large swell can damage kelp forests, ripping the

largest, most buoyant, stalks off the seafloor. Fishing activities have little to no impact on kelp health as seen by thriving kelp populations throughout history pre-dating even the MLPA when fishing access was less restrictive. It is well documented how we came to this spot in the first place for our kelp, the rolling El Ninos in the mid-2010s removed a substantial amount of our state's kelp forests, not fishing, and fishing restrictions are not what it will take for the forests to regrow. The creation or expansion of MPAs resulting from this petition will have a negligible effect on the recovery of kelp forests, but a permanent and lasting effect on those that have a livelihood on the water or those that want to simply fish and enjoy a day on the water. In some instances, such expansions may hinder restoration efforts by obstructing human interventions aimed at encouraging kelp growth, such as seeding areas or urchin barren removal efforts.

Furthermore, the petition does not adequately explain why most of the proposed expansion areas cover waters that are simply too deep for kelp to grow. All but one of its expansions (Gull Island) have this problem, covering waters well beyond kelps natural growing depth. Many of the proposed expansions extend to the state line, covering areas with depths exceeding 1,000 feet when kelp cannot grow any deeper than 150ft. For a petition focused on kelp restoration, this deepwater coverage is illogical and appears to be an attempt to limit area access to our already managed fisheries while protecting an area outside of the scope of the petition. Below are some of the petition's proposed expansions on SeaSketch with the kelp max extent per landsat and flyovers enabled (green layer under proposed expansions). This shows most of the expansion area does not even cover the absolute maximum kelp could grow. Any justifiable MPA expansions regarding kelp recovery at the bare minimum should be more targeted, covering specifically areas kelp can grow, not mass areas covering mostly water kelp cannot grow.





Lastly, the added amendments only pull back on one expansion, the Cabrillo SMR, and add in shore based take of finfish and general spearfishing of finfish at the proposed Pleasure Point SMCA and Point Dume SMCA. As mentioned previously, the shorebased allowance would reduce Pleasure Point and Point Dume to moderate-low levels of protection per the MLPA, losing their local MPA connectivity, making the proposed expansions weaken MPA connectivity rather than strengthen them. Specifically for Point Dume, that MPAs connectivity appears centrally important under the SeaSketch model and should be maintained. While the reduction in size at the Cabrillo expansion is a positive, we still believe any expansion in the first place is not warranted, especially for kelp restoration purposes.

<u>Petition2023-34MPA – Reject</u>

Petition 34 requests the redesignation of one offshore SMCA to a no-take SMR, merging it with the nearshore SMR at Point Buchon to make one no-take SMR. The petition also requests combining the nearshore and offshore SMCAs at Farnsworth into a single SMCA that would permit only pelagic finfish spearfishing, removing various pelagic fishing allowances existing there. The primary justification for these changes is enforcement concerns. Enforcement has effectively managed the existing MPA network without significant issues which already contains nearly 40% limited take SMCAs. The situations at Farnsworth and Point Buchon are similar to several other MPAs along the coast that successfully integrate nearshore and offshore components. The concept of allowing pelagic finfish targeting offshore—where interactions with the MPA's intended

protections are minimal—has been recognized since the first and second MPA Master Plans where it explicitly states the lesser effect pelagic fish have on themselves and the MPA ecosystem, and to allow for areas that have pelagic take respectively. Pelagic fishing should be permitted in MPAs that overlap with offshore waters, provided that fishing practices minimize interactions with local and nearshore species, which they inherently do. Additionally, if enforcement was truly the only concern, commercial harpoon at Farnsworth is just as enforceable, if not easier to enforce than recreational spear methods, and should be left in as an allowance in the SMCA. This petition also conflicts with Petition 20 and its requests at Point Bucheon.

The two MPA systems at Farnsworth and Point Bucheon are no different from other nearshore/offshore configurations, so-called “MPA clusters”, and we see no compelling reason to change them specifically. Both MPA clusters currently meet regional sizing guidelines for the total cluster area and LOP requirement to count them both for connectivity as is, with their current access. For these reasons, we believe this petition should be rejected.

Thank you,

AllWaters - AWPAC *(recreational)*
-Chris Killean (President)
-Matt Bond (Board Member)

Commercial Fishermen of Santa Barbara - CFSB *(commercial)*
-Chris Voss (President)
-Ava Schulenberg (Assistant Director)

Backcountry Hunters & Anglers - BHA *(recreational)*
-Devin O’Dea (Western Policy & Conservation Manager)

Coastal Conservation Association California - CCA Cal *(recreational)*
-Chris Arechaederra (Executive Director)
-Tonie Bagnos (Assistant Director)

Ventura County Commercial Fishermen's Association - VCCFA *(commercial)*
-Dave Colker (Executive Director)
-Jason Woods (President)
-Eric Hodge, Mike Kenny, Tim Athens (Board Members)

LA Rod and Reel Club *(recreational)*
-John Ballotti (President)

January 2026
Coalition Letter on Bin 2 MPA Petitions

Port San Luis Commercial Fishermen's Association *(commercial)*
-Chris Pavone (President)

Santa Barbara Sportfishing Club *(recreational)*
-Whitney Uyeda (President)

Alliance of Communities for Sustainable Fisheries *(recreational/commercial)*
-Alan Alward (Co-Chair)

San Diego Fishermen's Working Group *(commercial)*
-Pete Halmay (President)

Morro Bay Commercial Fishermen's Organization *(commercial)*
-Bill Blue (President)
-Tom Hafer (Secretary)

The Tuna Club Foundation *(recreational)*
-Chase Offield (Board Member)

Santa Barbara FreeDivers Club *(recreational)*
-Dave Huebner (President)
-Bradley Pirmen (Chair)

BD Outdoors *(recreational business)*
-Ali Hussainy (President)

The California Association of Harbor Masters and Port Captains *(commercial)*
-Tim Petrick (President)

Dana Wharf Sportfishing and Whale Watching *(recreational)*
-Donna Kalez (Co-Owner)

Santa Barbara Landing and Stardust Sportfishing *(recreational business)*
-Jamie Diamond (CEO/owner)

Monterey Bay Tritons *(recreational)*
-Brandon Burke (President)

NorCal Underwater Hunters *(recreational)*
-Matt Mattison (President)

January 2026
Coalition Letter on Bin 2 MPA Petitions

Fathomiers *(recreational)*
-Paul Romanowski (Conservation Officer)

The Catalina Seabass Fund *(recreational/commercial)*
-Jock Albright (Director)

The Laguna Maritime Alliance *(recreational/commercial)*
-Chase Offield (Chair)

Santa Cruz Kelp Stalker *(recreational)*
-Hans Haveman (Chair)

San Diego Freedivers *(recreational)*
-Ryan Moore (President)

OC Spearos *(recreational)*
-Hidenori Iwagami (president)

Long Beach Neptunes *(recreational)*
-Terry Maas (Chair)

Save Duxbury Access *(grassroots recreational/commercial)*
-Chris Martinelli (Local Lead)

American Fishing Tackle Company - AFTCO *(recreational/commercial business)*
-Bill Shedd (CEO)
-Casey Shedd (President)

Get Hooked Seafood *(commercial business)*
-Kim Selkoe and Victoria Voss (Co-Founders)

Pacific Coast Sportfishing *(recreational business)*
-Bill DePriest (Publisher / Editor)

January 2026
Coalition Letter on Bin 2 MPA Petitions

Dedicated Researchers/Scientists:

UCSB Bren School of Environmental Science & Management
-Dr. Dawn A. Murray (PhD. Ocean Sciences - UCSC)

UCSB & UCSC Conservation Scientist
-Dr. Jason Johns (PhD. Ecology and Evolutionary Biology - UCSB)

UCSB Marine Scientist
-Dr. Kim Selkoe (PhD. Ecology and Evolutionary Biology - UCSB)

Private Marine Scientist
-Ethan Estess (M.S. Earth Systems (Marine) - Stanford University)

Senior Marine Scientist and previous marine biologist for the Channel Islands NPS
-Derek Lerma (B.S. Biological Oceanography - Humboldt State University)

01/26/2026

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

Subject: Bin 2 MPA Petitions

Dear Melissa Miller-Henson,

Please add the San Diego County Wildlife Federation (SDCWF) to the CCA Coalition letter regarding Bin 2 MPA petitions being considered. We were unfortunately a bit late getting our logo and signature added to the letter represented below. The San Diego County Wildlife Federation represents over 20,000 sportsmen and women in San Diego County, and we are active in conserving our inland and aquatic habitats in a manner which allows both conservation protection with consumptive use of the waters of our state.

The SDCWF agrees with the recommendations of Coalition listed below.

Thank you for the work you and the Commissioners do for California outdoorsmen and women.

Respectfully,

Gary F. Brennan
President, San Diego County Wildlife Federation
P.O. Box 3886
Ramona, CA. 92065

Copy to: CCA California

Marine Conservation Institute

29 January 2026

Re: Comments from Marine Conservation Institute for consideration during the February 11-12, 2026 meeting on petitions to amend the state's MPA network.

(submitted via email to fgc@fgc.ca.gov)

Dear California Fish and Game Commission,

As California works to protect 30% of state waters by 2030 (30 x 30) to fight climate change, protect biodiversity, and expand access to nature for all Californians, the implementation of Marine Protected Areas (MPAs) that provide tangible benefits to marine biodiversity requires an understanding of effective conservation and knowledge of which MPAs meet that threshold.

Since 2012, Marine Conservation Institute's Marine Protection Atlas (MPAtlas) has brought a focused lens to the quality of marine protections in MPAs around the world. MPAtlas (mpatlas.org) is the largest global repository of MPA assessments using The MPA Guide[1]. The MPA Guide is a peer-reviewed scientific framework published in *Science* in 2021 that evaluates an MPA's stage of establishment and level of protection by looking at the management of mining, dredging & dumping, anchoring, infrastructure, aquaculture, fishing, and non-extractive recreational activities. Both management regulations and in situ activity data specific to each individual MPA are analyzed to determine the actual outcomes provided by a given MPA. Ecological evidence[2] from as recently as 2025 suggests that the best conservation outcomes are seen when MPAs are implemented or actively managed, and fully[3] or highly[4] protected from these seven activities.

Scientists from MPAtlas evaluated the 20 petitions proposing changes to California's MPA Network submitted to the California Fish and Game Commission by the public and Tribes in 2023 using The MPA Guide. Our preliminary analysis suggests that the following petitions would improve the level of protection for existing MPAs or designate new MPAs, expanding and strengthening the California State MPA Network's overall ability to achieve conservation benefits:

Petition	Marine Protected Area
2023-19MPA	Chitqawi SMCA
2023-20MPA	Point Buchon SMR
2023-23MPA-AM	Carmel Bay SMCA
	Pacific Grove Marine Gardens SMCA
	Tanker's Reef SMR
2023-24MPA-AM	Laguna Beach SMCA

14301 Arnold Drive Suite 25 Glen Ellen CA 95442
Marine-Conservation.org • +1 707 938-7036

2023-27MPA-AM	Anacapa Island SMCA
2023-28MPA-AM	Point Sal SMCA
2023-29MPA-AM	Mishopshno SMCA
2023-32MPA	Duxbury Reef SMR
2023-33MPA-AM	Cabrillo SMR
	Gull Island SMR
	Natural Bridges SMR
	Pleasure Point SMCA
	Point Conception SMR
	Point Dume SMCA
	South Point SMR
2023-34MPA	Farnsworth Offshore SMCA
	Farnsworth Onshore SMCA
	Point Buchon SMCA

With critical tipping points approaching ocean biodiversity, the opportunity to align California's MPA network with the best and most up-to-date understanding of MPA science is incumbent on the Commission. We urge the Commission to adopt the petitions that serve to advance conservation and keep the State of California moving forward with a world-leading example of marine conservation, creating an effective MPA network, and progressing towards the State's commitment to 30 x 30.

Sincerely,

Lance Morgan, PhD, President, Sonoma County
Nikki Harasta, Marine Conservation Scientist, Ventura County

1 Grorud-Colvert, K., et al. (2021). The MPA guide: A framework to achieve global goals for the ocean. Science. https://doi.org/10.1126/science.abf0861

2 Horta e Costa, B., et al. (2025). Marine protected areas' stage of establishment and level of protection are good predictors of their conservation outcomes. Cell Reports Sustainability. https://doi.org/10.1016/j.crsus.2025.100345

3 No impact from extractive or destructive activities is allowed and all abatable impacts are minimized. Non-extractive activities may include recreational, traditional, cultural, or spiritual activities. Examples include minimal impact snorkeling, swimming and SCUBA, tidepooling, cultural/ceremonial gatherings, education, knowledge transmission, and motorized or non-motorized vessels associated with the previously mentioned activities.

4 Only light extractive activities are allowed that have low impact, and all other abatable impacts are minimized. If any anchoring is allowed, it is small scale and for a short duration with a low impact. If any infrastructure is allowed, it is small scale with low impact. Any aquaculture must be low impact, small scale, low density, and unfed. If fishing occurs, it is infrequent and only five or fewer gear types are used that are highly selective and low-impact. Any non-extractive activities are regulated and restricted and of low impact, low density, and small scale.

From: Jennifer Sahn <[redacted]>
Sent: Sunday, February 1, 2026 9:59 AM
To: FGC <FGC@fgc.ca.gov>
Subject: Point Sal and Mishopshno State Marine Conservation Areas

February 1, 2026

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

Re: 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.

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. What would be even better would be co-management agreements with the tribes.

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. 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,

Jennifer Sahn

Santa Barbara, CA

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

February 6, 2026

Re: Retraction of signature and clarification of position on California MPA petitions

Dear President Zavaleta and Honorable Commissioners,

I am a marine scientist and environmental studies professor advising graduate students at Antioch University and teaching undergraduate courses in the Environmental Studies Department at UC Santa Barbara. I work in resource management and conservation realms to protect habitats and to amplify Indigenous voices in conservation initiatives. I also work locally with NOAA on intertidal marine sampling and support locally-rooted conservation efforts, including curriculum development and weaving Indigenous and Western Scientific Knowledge into system solutions. I have worked with the Northern Chumash Tribal Council (NCTC) supporting the Chumash Heritage National Marine Sanctuary (CHNMS) designation and Chumash cultural values, wisdom, and traditions in marine and land management practices. I currently serve on the NOAA CHNMS Advisory Committee as a Research Seat Alternate.

My research focuses on participatory conservation and co-designing conservation methods that equitably integrate local communities in multi-pronged conservation solutions. I value coalition-building, listening to and incorporating multiple perspectives in conservation planning. I work with fishermen around the world, including supporting the Miloli‘i Community-Based Subsistence Fishing Area (CBSFA), south of Kona, Hawai‘i, which includes the waters and submerged lands from the shoreline to the 100-fathom depth contour. The Miloli’i community leads the regulation creation and enforcement in their " last Hawaiian fishing village". In addition, I support the Commercial Fishermen of Santa Barbara in their continued efforts to practice local eco-friendly, sustainable fishing, sell locally caught fish in the Saturday market to our community, promote science and monitoring, and their stewardship of our coast via numerous annual beach and island clean-ups.

Over a year ago, I was asked to add my name to a joint letter about the MPA adaptive management proposals from commercial and recreational fishermen. I did so because of my relationships with many in the California fishing community. Recently, the letter was submitted to the Fish & Game Commission. Unfortunately, I had not kept up with the revisions, updates, or additions to the letter in the last 13 months and the in-depth amendments to each MPA petition. The letter contains recommendations that I am unable to endorse due to my expertise as a marine scientist. I need to retract my signature from that letter and clarify my position.

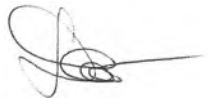
Clarifying my current perspectives on the MPA petitions:

- I submitted a letter in November 2023 endorsing Petition 2023-33MPA, and I am a supporter of protecting California's kelp forests because they provide invaluable ecological and environmental benefits. These dynamic and biodiverse ecosystems serve as critical nurseries for a wide variety of marine species, providing shelter and food for numerous fish, invertebrates, and marine mammals. Healthy kelp forests support thriving commercial and recreational fisheries and can help dampen the impacts of coastal erosion and storm impacts. With the declines in kelp forest cover across the Pacific West Coast, including California, from natural and human-induced factors, MPAs are a critical tool for supplying the population of recruits and supporting the resilience of kelp ecosystems in the face of these stressors.
- To achieve the stated goals of conserving biodiversity and ecosystem health, I encourage the state to consider increasing protections for MPAs that are currently only lightly or minimally protected as defined by The MPA Guide,[1] especially in places where weaker or more complicated regulations lead to poor compliance and enforcement. An example of what I support are the clarifications on Kashtayit regulation language and Campus Point SMCA color coding (Petition 2023-18MPA).
- I support strengthening the MPA network through the addition of new MPAs where they would protect critical habitat and advance Tribal co-stewardship. To that end, I endorse Petition 2023-28MPA designating Point Sal SMCA, which provides an opportunity to strengthen protections within the CHNMS and offers a pathway for meaningful co-stewardship between the state and NCTC. In addition, I support Petition 2023-29MPA designating Mishopshno SMCA, which would protect a special place culturally and ecologically, and similarly offer a pathway for meaningful co-stewardship between the state, Santa Ynez Band of Chumash Indians, and potentially other Tribes. I appreciate that the petitioners were responsive to feedback from the local community, including recreational and commercial fishers, cutting the size of the proposal in half.
- Finally, I do not support weakening MPA protections off the California coast in any capacity. For example, to open recreational fishing opportunities to non-Base fishers, Petition 2023-18MPA would create a narrow alongshore State Marine Conservation Area within the existing SMR that would allow all people to fish for finfish by hook and line. This change would weaken the MPA network by officially downgrading the protections within the state's largest fully protected MPA. Instead, I support the state ensuring current Vandenberg SMR restrictions are enforced and applied to Base personnel and dependents, so that it is not only non-military community members who must comply.

California's MPA network is imperative for maintaining healthy ocean habitats, biodiversity along the California coast, and ecosystem resilience. Management of MPAs can also honor numerous knowledge systems - commercial fishers, recreational fishers, Indigenous peoples, local communities, and Western scientific knowledge systems. The adaptive management process offers a pathway to improve, and build on the successes of our globally-recognized MPA network.

[1] Grorud-Colvert, Kirsten, Jenna Sullivan-Stack, Callum Roberts, et al. 2021. "The MPA Guide: A Framework to Achieve Global Goals for the Ocean." Science, ahead of print, September 10. World. https://doi.org/10.1126/science.abf0861.

Thank you for the opportunity to clarify my position. I appreciate your leadership and your commitment to a healthy and vibrant ocean for all.



Dr. Dawn A. Murray
Professor Environmental Studies, Antioch University
Lecturer Environmental Studies Department, UC Santa Barbara

Received at California Fish and Game Commission
February 9, 2026

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.[1] In 2023, coastal tourism brought just over $2 billion in travel-related spending to Santa Barbara County and supported more than 20,000 jobs.[2]

[1] NOAA 2016, The National Significance of California's Ocean Economy
https://coast.noaa.gov/data/digitalcoast/pdf/california-ocean-economy.pdf
[2] 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,

John Steinbeck
Retired Marine Biologist
[redacted]

Received at California Fish and Game Commission
February 20, 2026

The Land Trust for Santa Barbara County

OUR MISSION

THE LAND TRUST FOR SANTA BARBARA COUNTY CONSERVES NATURAL RESOURCES, AGRICULTURAL LAND AND OPEN SPACES FOR THE BENEFIT OF PRESENT AND FUTURE GENERATIONS.

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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

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

Received at California Fish and Game Commission February 20, 2026

Point Blue Conservation Science

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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 Calfornia 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 unpublishded 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 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.

Outlook

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

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: 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

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]

Outlook

Marine Conservation Institute Comments on CDFW Recommendations for MPA Petitions

From Ali Rubin <ali.rubin@marine-conservation.org>
Date Tue 03/31/2026 03:02 PM
To FGC <FGC@fgc.ca.gov>

Dear Commissioners,

On behalf of Marine Conservation Institute, please find attached our comments on the California Department of Fish and Wildlife's Evaluations and Recommendations for the ten non-Tribally-led Marine Protected Area (MPA) petitions released on March 20, 2026 .

We appreciate your consideration of these comments and your continued work to advance effective marine conservation in California.

Sincerely,
Ali Rubin

Ali Rubin
Marine Conservation Scientist

Marine Conservation Institute

ali.rubin@marine-conservation.org
marine-conservation.org

Marine Conservation Institute

March 31, 2026

President Eric Sklar
California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244-2090
Submitted electronically to: fgc@fgc.ca.gov

Re: Comments from Marine Conservation Institute on petitions to amend the State's MPA network.

Dear California Fish and Game Commission,

On behalf of Marine Conservation Institute, we appreciate the opportunity to provide comments following the California Department of Fish and Wildlife's (CDFW) Evaluations and Recommendations for the ten non-Tribally-led Marine Protected Area (MPA) petitions released on March 20, 2026.

Marine Conservation Institute works to secure strong protection for the ocean's most important places. Through our Marine Protection Atlas (MPAtlas), we assess marine protected areas globally using The MPA Guide, a peer-reviewed framework that evaluates the level of protection and expected conservation outcomes of MPAs. Our work supports governments and partners, including in California, in advancing effective, science-based marine conservation and achieving 30x30 goals.

We recognize the significant effort undertaken by CDFW to evaluate these petitions based on the information available as of March 2025, and we appreciate the Department's acknowledgment that additional information may continue to inform Commission deliberations. As California works toward protecting 30% of state waters by 2030, maintaining the integrity and effectiveness of the existing MPA network is essential to achieving meaningful conservation outcomes.

As part of this effort, we conducted an analysis to determine the likely biodiversity outcomes of the petitions submitted to the State using The MPA Guide framework. This approach applies a consistent, science-based method to evaluate how proposed changes would affect protection levels and conservation outcomes across California's MPA network.

We strongly support CDFW's recommendations to deny petitions that would lower protection levels within California's MPA network by allowing additional recreational or commercial take of marine life. Scientific evidence consistently demonstrates that the greatest ecological benefits such as increased biomass, biodiversity, and ecosystem resilience are achieved in MPAs that are fully or highly protected from extractive activities.

We also acknowledge that localized ecological pressures, such as sea urchin overpopulation and kelp loss, may require active management. In these cases, we encourage the Commission to explore adaptive, site-specific management strategies that address these threats without reducing protection levels or opening extractive fisheries within MPAs.

In particular, we support the recommendations to deny the following petitions:

- Modify Take in 9 SMCAs to Allow Commercial Take of Sea Urchins (2023-14MPA)[1]
- Reclassify Footprint, Gull Island, and Santa Barbara Island SMRs to SMCAs to Allow Take of Highly Migratory Species (2023-15MPA_AM)
- Reclassify Stewarts Point and Bodega Head SMRs to SMCAs to Allow Commercial Salmon Trolling (2023-16MPA)
- Modify Allowed Uses at Several Santa Barbara Channel MPAs and Special Closures: Vandenberg SMR, Kashtayit SMCA, and San Miguel and Anacapa Special Closures (2023-18MPA)

1: With the exception of the Point Vicente no-take SMCA, petition 2023-14MPA does not lower the Highly Protected status of the named MPAs per our MPA Guide analysis, and may provide ecological benefits through the restoration effort of urchin culling. However, while ecosystem restoration and conservation may be complementary, they are non-substitutable actions where priority should be given to preventing the degradation of intact ecosystems.

These petitions propose changes that would reduce the level of protection in areas that currently contribute to the ecological performance of California's MPA network. Downgrading protections risks undermining biodiversity gains, weakening ecosystem resilience in the face of climate change, and compromising California's leadership in marine conservation.

To advance the state's goal of protecting 30% of nature by 2030, we do believe that the following proposals will modestly strengthen the network and urge the commission to support them:

- Designate new MPA as Chitqawi SMCA (2023-19MPA)
- Redesignate Point Buchon SMCA as Chumash SMCA to support tribal co-management and take provisions; extend northern boundary of Point Buchon SMR (2023-20MPA)
- Multiple changes to Pyramid Point SMCA (2023-21MPA)
- Reclassify all or part of Anacapa Island SMR (2023-27MPA)
- Designate new MPA as Point Sal SMR (2023-28MPA)
- Add new MPA as Mishopshno SMCA near Carpinteria (2023-29MPA)
- Reclassify and expand Duxbury Reef SMCA (2023-32MPA)
- Reclassify Point Buchon SMCA and modify regulations in Farnsworth MPAs (2023-34MPA)

California's MPA network is widely recognized as a global model for science-based ocean protection. Maintaining strong protections within this network is critical not only for achieving the State's 30x30 commitments, but also for ensuring long-term conservation benefits for marine ecosystems and coastal communities.

We respectfully urge the Commission to uphold CDFW's recommendations to deny these petitions and to continue advancing policies that strengthen, rather than diminish, the effectiveness of California's MPA network.

Thank you for your consideration.

Respectfully,

Lance E. Morgan, President
Nikki Harasta, Marine Conservation Scientist I
Alexandra Rubin, Marine Conservation Scientist I

Received April 2, 2026

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

From: Matthew Bond

Sent: Saturday, April 4, 2026 4:56 PM

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

Subject: April 14 Tribal Committee Meeting Comment From Allwaters Re Tribal MPA Petition Review Process and Tribal MPA Petitions

Hello,

Please find our comment attached.

Thank you.

Matt Bond

Allwaters.

March 30, 2026

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

Submitted electronically to fgc@fgc.ca.gov

Re: 04/14/2026 Fish and Game Commission Tribal Committee Meeting Agenda Item 4

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

My name is Matt Bond and I'm commenting on behalf of Allwaters Protection and Access Coalition. Please accept our thoughts on the Tribally led or co-led MPA petitions being evaluated by the Commission.

Because we are now unclear as to the process being used to evaluate these petitions and it doesn't seem we will be able to comment on them at the bio regional meetings, we are taking this opportunity to share our recommendations and supporting analysis with the Commission. We are equally uncertain if the guidelines we have been working with for the past two and a half years are still valid for this set of petitions. Stakeholders, The Commission and The Department were working with the understanding that petition analysis and decisions would be based on SAT guidelines from original MLPA, The Master Plan for MPAs, as much as possible site specific or at least locally relevant scientific analysis, and other historically relevant information. We are no longer sure this is the case. We strongly encourage this Committee to recommend to the full Commission that these petitions continue to be evaluated by the Department in the same manner the non-tribal petitions were. Creating a separate framework, outside of what is called for by the MLPA, potentially serves as a barrier to trust and participation and may result in outcomes that harm both the marine resources you are charged with managing as well as the people who depend on them for health, recreation, and sustenance. The following are our opinions and corresponding rational, based on the original, agreed upon process.

Petition2023-19MPA – Reject or Modify

Petition 19 requests the creation of a tribal co-managed SMCA at Morro Bay that only allows for the recreational take of finfish and invertebrates except rock scallops and mussels by hand harvest, also including a tribal take exemption within the SMCA. We believe the petition should be either rejected or amended to allow for more general recreational and commercial take as well.

We believe tribal co-management to be a great step forward in managing California's waters and should be present in all MPAs; however, creating a new MPA that restricts

exclusively commercial groups and most recreational fishing access from such an essential area should not be warranted. The commercial blocks overlapping the proposed SMCA account for 6.2% of Morro Bay's landing revenue alone. More specifically, these blocks represent 25% of the area's squid landings, 8.8% of the groundfish landings, and 15% of the area's salmon landings, per the MFDE. While not an exact correlation, recreational access in the area is likely comparable (with the exception of squid) and will likely be equally affected in the MPA regions, as this petition affects all fisheries not involving direct hand harvesting.

Additionally, there is concern that the proposed offshore wind energy program has its proposed electrical lines connecting the Morro Bay power bank stations to the offshore array crossing through the SMCA. If passed, this would need to be addressed and an additional allowance added.

Petition2023-20MPA – Reject Nearshore and Clarify/Accept Offshore

Petition 20 requests changes to the MPA cluster, the nearshore and offshore MPAs, at Point Buchon. The petition requests the offshore SMCA allow the hand harvest of finfish and invertebrates except rock scallops and mussels, allow the maintenance of artificial structures under the correct permits, and provide a tribal take exemption for federally recognized tribes. However, it is unclear if these requested allowances to the offshore SMCA at point Buchon are replacing or adding to existing recreational and commercial allowance for the take of albacore and salmon. Pursuant to the allowances being additive and not replacing the existing take allowances in the offshore MPA we support the request for the offshore region of the MPA cluster to have the added take allowances. This example in the offshore region is a clear example of how tribal components can be added to the existing network, not requiring creation of more MPAs to involve tribes.

Regarding the petitioner's request to the nearshore SMR being expanded, we believe this request should be rejected. The expansion of only the SMR section of the Point Buchon nearshore/offshore cluster would unnecessarily remove all access from the added area. The justification for this addition comes from MPA Collaborative meetings citing enforcement concerns, stating that moving the northern boundary to the physical point will provide a better reference for enforcement. The core reason the existing MPA does not go to the physical point on land is because the nearest whole decimal degree value was used as the northern boundary instead, following MLPA guidelines. This usage of a round Lat/Long number for an MPA that does not experience much shore fishing opportunity is supported by the MLPA MPA design criteria to explicitly help, not hurt, enforcement. The current northern boundary gives those fishing beyond shore an easy to understand GPS reference point to know where the boundary is. Additionally, expanding only the nearshore SMR may cause further enforcement problems with the offshore SMCA remaining its original size. The expansion of the nearshore only leads to a case of an unevenly sized MPA in the nearshore and offshore regions.

Petition2023-21MPA – Accept

Petition 21 requests the Pyramid Point SMCA in the northern bioregion be modified to remove its existing recreational allowances for take of surf smelt and give additional tribal exemption to the Tolowa Dee-ni' Nation on top of its existing tribal exemption. The petition also requests the border of the MPA be moved south to the true CA-OR state boundary line, slightly shrinking the MPA.

While this petition does remove some recreational access to take surf smelt, that access was already relatively limited and small scale. The change to the border to shrink the SMCA to align to the actual state border clears up any possible confusion or issues the overlap currently causes. Overall we are supportive of this change, and addition of another Tribal component to the existing Pyramid Point SMCA.

Petition2023-28MPA-AM1 – Reject

Petition 28 requests the establishment of a new MPA around Point Sal. This MPA would significantly impact local fisheries, recreational and commercial, despite the petitioner's claim that the effects would be minimal. For this primary reason we believe the petition should be rejected, even as amended to allow for shore based take of finfish.

The petition includes an economic analysis of the proposed area but overlooks the devastating local impacts this MPA would have economically. While the petition accurately states that the overlapping commercial fishing blocks contribute to 1.1% of the central coast's total landings by value, it fails to consider the actual local implications of that 1.1% and what it represents. Using the same time range (2012 to 2022) on the MFDE, the local port nearest to the proposed MPA, Port San Luis/Avila, derived 28.12% of its total commercial revenue from the overlapping blocks 631 and 632. More specifically, 25.92% of the port's groundfish revenue and 57.79%, over half, of its crab revenue came from these areas. If recreational effort even somewhat mirrors commercial effort in the area, not only is Point Sal relevant commercially, but recreationally too offshore. Establishing an MPA at Point Sal will significantly harm the community of Avila and other nearby ports, threaten local businesses, harm or remove people's sources of income, and remove recreational and subsistence access to the area by boat.

Providing shore based take of finfish would allow for beach anglers to continue fishing as they have been, but would do so at the loss of all offshore activity. More notably, this also results in a drop of the LOP of the SMCA to moderate-low. This LOP ranking per the MLPA fails any connectivity requirements making the final proposed SMCA a protected area that does not add to total MPA network connectivity. This brings into question the main argument of the petitioner to add this MPA in order to maintain MPA connectivity, as the final amended SMCA would not accomplish this.

Petition2023-29MPA-AM1 – Reject

Petition 29 requests a new MPA be created at Carpinteria. This MPA would be a tribally allowed SMCA that would be closed to non-federally recognized tribal fishing (general recreational and commercial fishing); the petition was amended to reduce its overall size and allow shore-based take of finfish. The petition's three primary arguments for the new SMCA are to meet habitat connectivity/MPA spacing requirements, to protect habitat surrounding juvenile white shark grounds, and to allow for tribal access. While tribal co-management of all California MPAs should be considered, we believe for the following reasons this specific MPA proposal should be rejected.

Regarding habitat connectivity, the petition asserts that the spacing of the existing MPA network exceeds the recommendations set by the MLPA scientific advisory team, which suggests a minimum spacing of 31 to 62 miles. The petition argues that the nearest coastal MPAs, Campus Point and Point Dume, are too far apart, claiming they are separated by 63.8 nautical miles or 73.4 miles (Image 1).

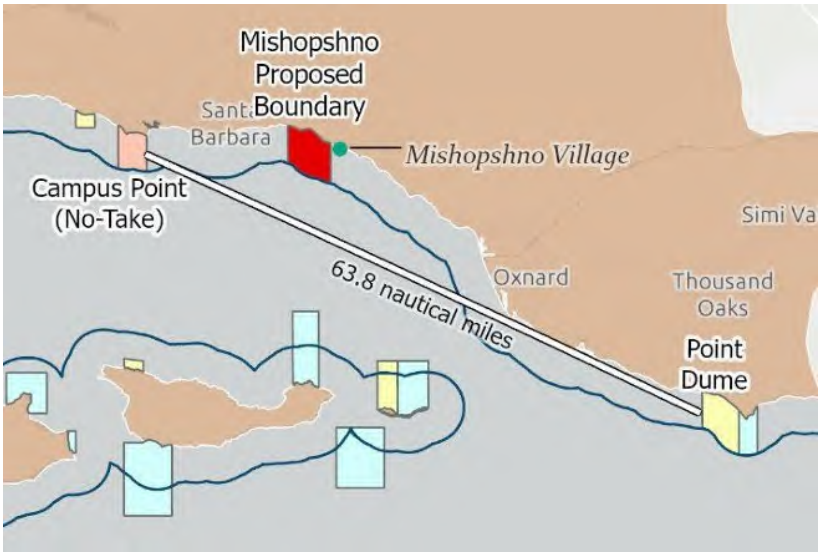

Image 1: Petition 29's image displaying proposed area and claimed spacing between existing Pt. Dume and Campus Point SMAs to be 63.8 nm (73.4 mi), which, if true, would exceed the southern MLPA MPA spacing requirements.

Note: the shown MPA is the original, pre-amendment size.

Discussions with the CDFW clarified that MPA spacing is measured by the, "shortest distance over water between two MPAs." When measuring the distance between Campus Point and Point Dume, we find that it is in fact less than 62 miles, indicating that the current spacing distribution is adequate along the coast (see below Image 2).

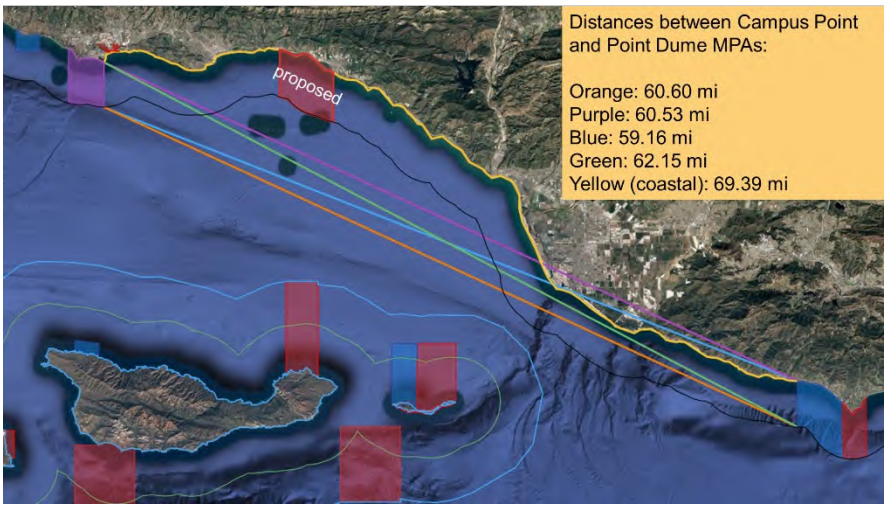

Image 2: Actual spacings between nearest existing MPAs around the proposed site. All but one straight line measurement exceeds 62 miles. The length that would be used by CDFW according to their provided input would be 60.60 mi (orange line) which falls within the spacing requirement.

Following the CDFW and MLPA guidelines, the shortest water distance between the two existing MPAs is ~60.60 miles, viewable by the orange line. This distance falls within the 31–62-mile MLPA spacing requirement. None of the provided measurements, including a measurement along the coastline (yellow) exceeded 73.4 miles of separation as the petitioner claims, again bringing into question the purpose for the new MPA if connectivity is already met.

In addition, the provided shore based take of finfish does allow for some form of recreational take but this now raises connectivity concerns. As mentioned in previous petitions, allowance of shore fishing of finfish reduces an MPAs LOP to moderate-low, losing its MPA connectivity with the network, this is confirmed by SeaSketch. Connectivity was a major reason for this MPAs proposal. With connectivity now lost due to these allowed take methods begs to question the purpose for this implementation in the first place if its foundational goals are not even accomplished. The LOP chart for the southern bioregion, moderate low protection is provided below.

	Mod-low	**SMCA SMP**	**Shore fishing** (H&L, hoop net); **kelp bass, barred sand bass, lingcod, cabezon, and rockfish** (H&L, spearfishing); **sheephead** (H&L, spearfishing, trap); **spotted sand bass and halibut** (H&L); **lobster** (trap, hoop net, diving); **urchin** (diving); **rock crab and Kellet's whelk** (trap); **catch and release** (H&L-general) **In water depth <10m: Catch and release** (H&L-single barbless hooks and artificial lures) **In water depth <50m at islands and <30m on mainland: pelagic finfish, bonito and white seabass** (H&L);

Regarding the protection of juvenile white shark nursery grounds, a similar petition was submitted in 2020 (Petition 2020-012 AM1) to close off a smaller section of beach at Carpinteria for the same purpose. Like Petition 29, this earlier petition aimed to protect juvenile white sharks within the currently proposed area. This 2020 petition was rejected by the Department and the Fish and Game Commission (FGC), which stated that MPAs are designed to protect nearshore ecosystems rather than individual species, especially

highly migratory species like white sharks. Given that this issue was previously addressed at the same location just four years ago, the same arguments against the current petition apply today regarding white sharks.

Lastly, regarding the tribal access portions of the petition, while tribal access and co-management should be explored across the entire MPA network, current access to the area by tribes is not limited in any way. Regardless of a tribal MPA designation or not, federally recognized tribes will have access in the area just like the public. Closing this area off to all groups except those of the federally recognized Santa Ynez Band of Chumash Indians would have the additional side effect of restricting any non-federally recognized tribes, as the petition does mention. In addition to the above counter reasons of the petition's primary claims, there exists additional effects to be considered at the proposed MPA site. The proposed area was considered during the MLPA for the southern section but was traded off for two other SMCAs on the coast, Naples and Kashtayit that were present in different MPA alternatives that Carpinteria was not in. If allowed, the new MPA would essentially break the agreements struck during the MLPA. Lastly, the pre- and post-amended boundaries overlap existing oil infrastructure that is maintained year round, no existing exemptions or conversations have been had regarding this infrastructure overlap. For these reasons we believe the petition should be denied.

Thank you very much for this opportunity to comment and for your dedicated work in supporting both the interests of California's Tribal People as well as the health and perseverance of the natural resources shared in trust by all Californians.

Respectfully,

Matt Bond

Allwaters Protection and Access Coalition

FGC@FGC

From: John Hood
Sent: Monday, April 6, 2026 1:53 PM
To: FGC
Subject: Expanding California's Marine Protected Area

Categories: Exhibit

April 6, 2026

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

Re: Support for Petitions 2023-28MPA and 2023-29MPA

Dear President Zavaleta and Honorable Commissioners:

I am writing to express my family's 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. As a family with longstanding roots with these coastal regions, conserving these two special areas will help protect and restore ocean health. It will enhance coastal recreation experiences and help ensure Santa Barbara County's coastal economy thrives for decades to come. The Hood family urges 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,

John Hood

From: Lisa Damrosch-PCFFA <lisa@pcffa.org>
Sent: Thursday, April 9, 2026 05:08 PM
To: California Fish and Game Commission
Subject: RE: Agenda Item 4 – Tribally Led and Co-Led MPA Petitions (April 14, 2026 Tribal Committee)

Attached please find PCFFA's public comment on Agenda Item 4 regarding tribally led and co-led MPA petitions for the April 14, 2026 Tribal Committee meeting.

Thank you,
Lisa

--

PCFFA PACIFIC COAST FEDERATION OF FISHERMEN'S ASSOCIATIONS
LISA DAMROSCH
EXECUTIVE DIRECTOR
650-255-2063-WWW.PCFFA.ORG

PCFFA PACIFIC COAST FEDERATION OF FISHERMEN'S ASSOCIATIONS

April 14, 2026

The Honorable Jacque Hostler-Carmesin
Chair, Tribal Committee
California Fish and Game Commission

RE: Agenda item 4- Tribally Led and Co-Led Marine Protected Area (MPA) Petitions

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

On behalf of the Pacific Coast Federation of Fishermen's Associations (PCFFA), we appreciate the opportunity to provide input regarding Marine Protected Area (MPA) petitions scheduled for discussion at the April 14 Tribal Committee meeting.

PCFFA is a statewide organization of commercial fishing associations from San Diego to Crescent City and represents the majority of active commercial fishermen in California. Our members fish across multiple regions, fisheries, and gear types, supporting working waterfronts and the production of locally sourced seafood. At a time when the U.S. relies on imports for more than 80% of the seafood it consumes, decisions that reduce access to sustainably harvested domestic seafood directly undermine food security and increase dependence on foreign supply chains with lower environmental and labor standards. We have a direct stake in decisions that change access to fishing grounds, including the use of the State's MPA network to impose additional closures within an already highly regulated and actively managed system.

We recognize the importance of Tribal stewardship and the cultural connections between Tribal communities and marine resources. We support collaborative approaches to co-management where they are grounded in meaningful engagement, sound science, and transparency. Commercial fishermen are not separate from conservation. We have been ocean stewards for generations. Our businesses depend on healthy ocean ecosystems, and we have a direct, daily stake in how those systems function in the real world, not just in theory. We have seen the consequences of these decisions play out in our coastal communities. The fleet disappears, businesses shut down, and consumers are pushed toward imported seafood with fewer protections and a much larger carbon footprint, undermining the climate goals these policies claim to support.

The current consideration of these petitions highlights broader issues with process, standards, and how decisions regarding additional permanent closures are being made. Petitions affecting the same statewide MPA network are being advanced through separate venues, rather than evaluated within a single, consistent framework. Decisions of this scale carry long-term ecological, economic, and social implications and should be subject to clear, comparable standards. As structured, there is a risk that similar proposals will not receive the same level of analysis, comparison, and scrutiny.

Lisa Damrosch • Executive Director • lisa@pcffa.org • 650-255-2063 • www.pcffa.org

PCFFA PACIFIC COAST FEDERATION OF FISHERMEN'S ASSOCIATIONS

Across these petitions, in both the Tribal and non-Tribal pathways, there is a pattern of petitions seeking additional restrictions without demonstrating they will produce a measurable benefit. There is little clarity on what specific problem is being solved, or whether the proposed tool matches that problem at the scale being proposed.

We need to be clear about whether these petitions are actually solving a problem, or simply creating the appearance of action while imposing real costs on working food producers and coastal communities. These closures remove access to active fishing grounds that support ongoing commercial activity and cannot be replaced by shifting effort elsewhere, with direct consequences for fishing families, processors, distributors, and working waterfronts.

Commercial fishing has become a convenient target for additional restrictions, not because it is always the primary driver of the issue, but because it is one of the easiest sectors to regulate.

PCFFA will continue to engage in these processes and work toward solutions that are grounded in sound science and real outcomes. We will not support actions that restrict domestic food production and damage coastal communities without a clear, demonstrated benefit.

We respectfully ask the Tribal Committee to ensure that any recommendations to the Commission reflect the need for a clear, consistent standard for evaluating MPA petitions. That standard should include a clear definition of the problem being addressed, evidence that the proposed closure is necessary to address that problem, and an evaluation of the resulting impacts to food production and coastal economies. Petitions that would result in additional closures to commercial fishing should not move forward. We provide more petition-specific comments in Appendix A.

Sincerely,

Lisa Damrosch
Executive Director

Lisa Damrosch • Executive Director • lisa@pcffa.org • 650-255-2063 • www.pcffa.org

PCFFA PACIFIC COAST FEDERATION OF FISHERMEN'S ASSOCIATIONS

APPENDIX A – Petition-Specific Comments

Petition 2023-29 – Mishopshno (Carpinteria Reef)

This petition targets Carpinteria Reef, one of the most heavily utilized nearshore fishing areas in the Santa Barbara Channel. The Carpinteria Reef / Block 652 area has produced more than 200,000 pounds of trap-caught landings over the past decade, with 100–200 vessels and up to 2,500 landing receipts recorded.

SeaSketch mapping conducted with 53 commercial fishermen identified this area as high to maximum value for trap fisheries. This is not marginal habitat. It is core working ground that supports ongoing fishing activity and cannot be replaced by shifting effort elsewhere.

The proposal would remove access to this area without demonstrating a clear ecological need or showing that a permanent closure at this scale is necessary. It also does not address how displaced fishing effort will be redistributed or what the resulting economic and operational impacts will be.

This applies a broad, permanent closure to a core fishing area and reflects a level of overreach that is not supported. This petition should not move forward.

Petition 2023-27 – Anacapa Island (Frenchy's Cove)

This petition proposes expanded MPA protections at Anacapa Island, including areas currently used by commercial trap fisheries. These grounds are actively fished and part of the working footprint of the fleet in the Santa Barbara Channel. The stated concern relates to eelgrass habitat, which available information indicates is concentrated in the 20–45 ft depth range.

The proposed closure extends well beyond that range in both depth and geographic scope. That mismatch between the identified issue and the scale of the closure raises a basic question of fit.

A broad, permanent closure is being applied where a more targeted approach could address the stated concern without removing access to the surrounding fishing grounds. This petition should not be advanced as proposed.

Petition 2023-28 – Point Sal

This petition proposes expanded MPA protections along the Point Sal coastline, covering active fishing areas used by multiple gear types. Unlike other proposals that at least point to a defined resource concern, this petition does not clearly identify a site-specific condition that requires permanent closure.

Instead, it applies a broad spatial restriction across working fishing grounds without establishing why this location, at this scale, requires that level of action. In the absence of a defined problem tied to the footprint of the closure, the proposal reads as a blanket restriction rather than a targeted response. This petition should not move forward.

Lisa Damrosch • Executive Director • lisa@pcffa.org • 650-255-2063 • www.pcffa.org

PCFFA PACIFIC COAST FEDERATION OF FISHERMEN'S ASSOCIATIONS

Petition 2023-21 – Pyramid Point (Big Sur)

This petition proposes additional MPA protections in the Big Sur region, including areas used by commercial fisheries operating along the Central Coast. The proposal introduces additional closures without demonstrating that permanent restrictions are necessary at this location. There is no clear showing of why existing conditions cannot be addressed through current management tools or why a closure at this scale would produce a measurable benefit. Without that connection, the proposal extends the use of MPAs beyond a clearly defined need and should not move forward.

Petition 2023-20 – Central Coast (Chumash-related proposals)

This petition proposes changes to how MPAs are structured and applied along the Central Coast. Unlike the other petitions, this proposal focuses on structural changes rather than clearly defined new closures. However, changes to how MPAs function can affect access depending on how they are implemented. Evaluating these changes through a separate pathway raises concerns about consistency, particularly if modifications to the MPA network that affect access are not held to the same standards applied elsewhere. That issue is not about any one location, but about how decisions affecting the same system are being made. Changes to the MPA network that affect access should not move forward through a separate pathway.

Lisa Damrosch • Executive Director • lisa@pcffa.org • 650-255-2063 • www.pcffa.org

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Co-Executive Director
Nancy Avoce
Assistant Director
Joyce Howerton
Consultant

SANTA BARBARA COUNTY ACTION NETWORK
P.O. Box 6174
Santa Maria, CA 93456
info@sbcan.org
www.sbcan.org
Facebook.com/SBCANorg
916.541.0582

April 9, 2026

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

Re: Support for Petitions 2023-28MPA and 2023-29MPA

Dear President Zavaleta and Honorable Commissioners:

Santa Barbara County Action Network strongly supports 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 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. We 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,

Jeanne Sparks, Co-Executive Director

Ken Hough, Co-Executive Director

From: Saule Baipsys <outreach@dunescenter.org>
Sent: Wednesday, April 15, 2026 11:03 AM
To: FGC <FGC@fgc.ca.gov>
Subject: Point Sal Support from Guadalupe Students

Good morning, President Sklar and Honorable Commissioners,

I am Saule Baipsys the Outreach Coordinator and Educator at the Guadalupe-Nipomo Dunes Center. I am emailing to share our local students support of the Point Sal MPA. Through lessons, discussions, and activities, our students have cultivated a great love for this area and are eagerly anticipating its designation as a State Marine Protected Area. Please see their letters and drawings of support attached in this email.

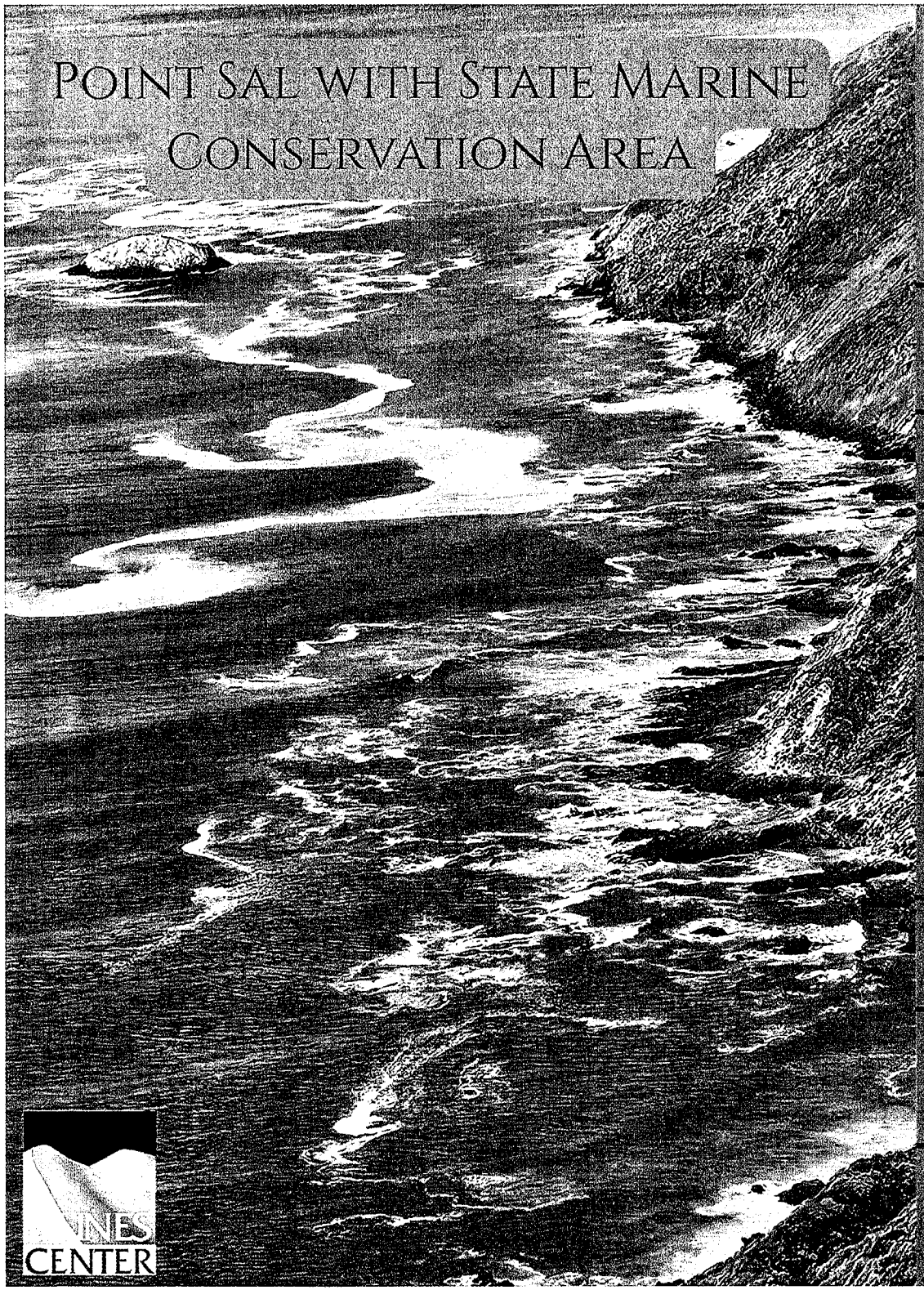
Thank you for your commitment to serving the natural resources of our state and sowing hope for California's next generation of ocean advocates.

With gratitude,

Saule Baipsys

Outreach Coordinator
Guadalupe-Nipomo Dunes Center
1065 Guadalupe Street
Guadalupe, CA 93434
www.dunescenter.org
805-343-2455 phone
310-844-2369 cell

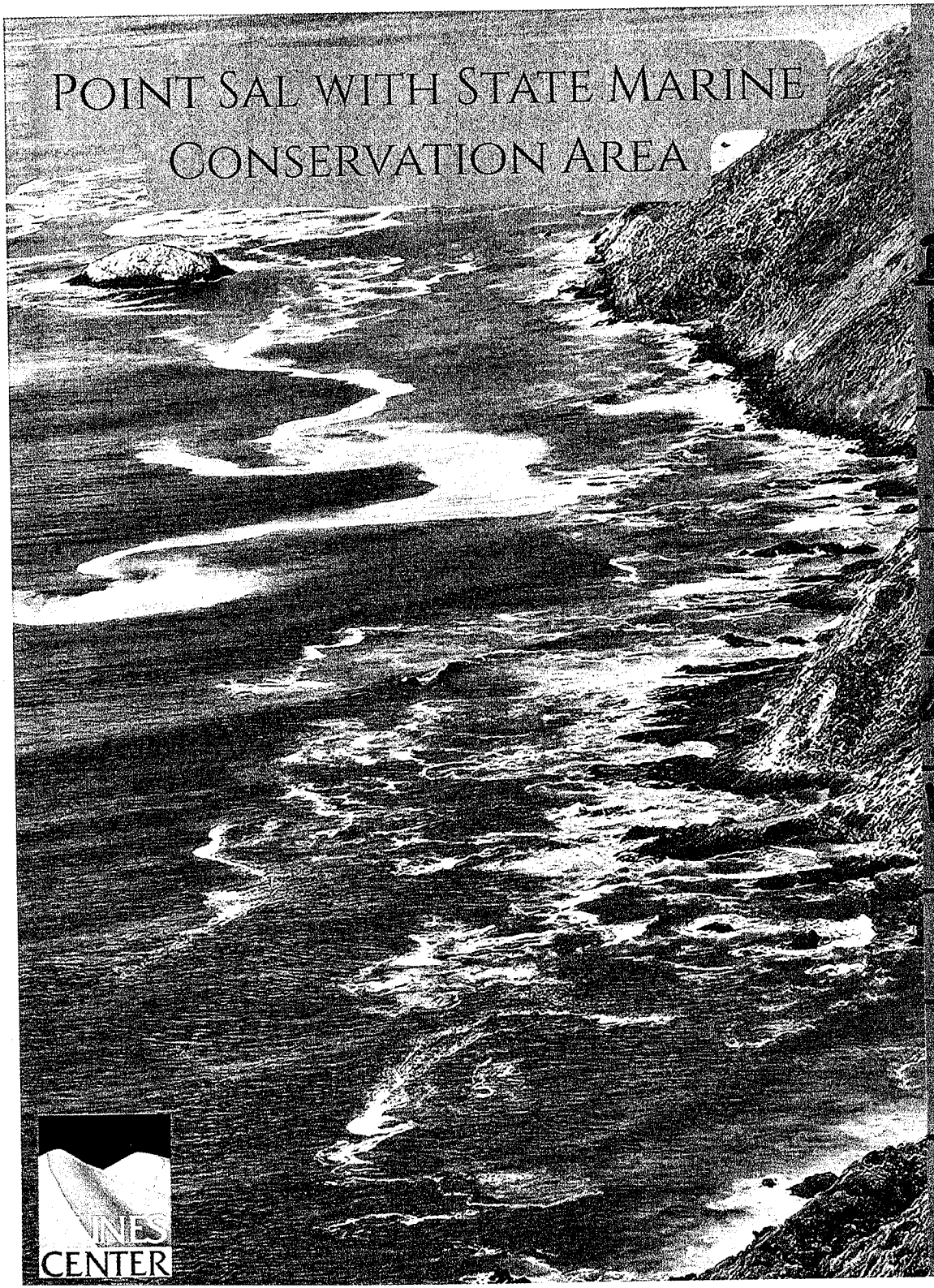
Promoting the conservation of the Guadalupe-Nipomo Dunes ecosystem through education, research, and the support of cooperative stewardship.



POINT SAL WITH STATE MARINE CONSERVATION AREA

MLPA INITIATIVE

MARINE LIFE PROTECTION ACT

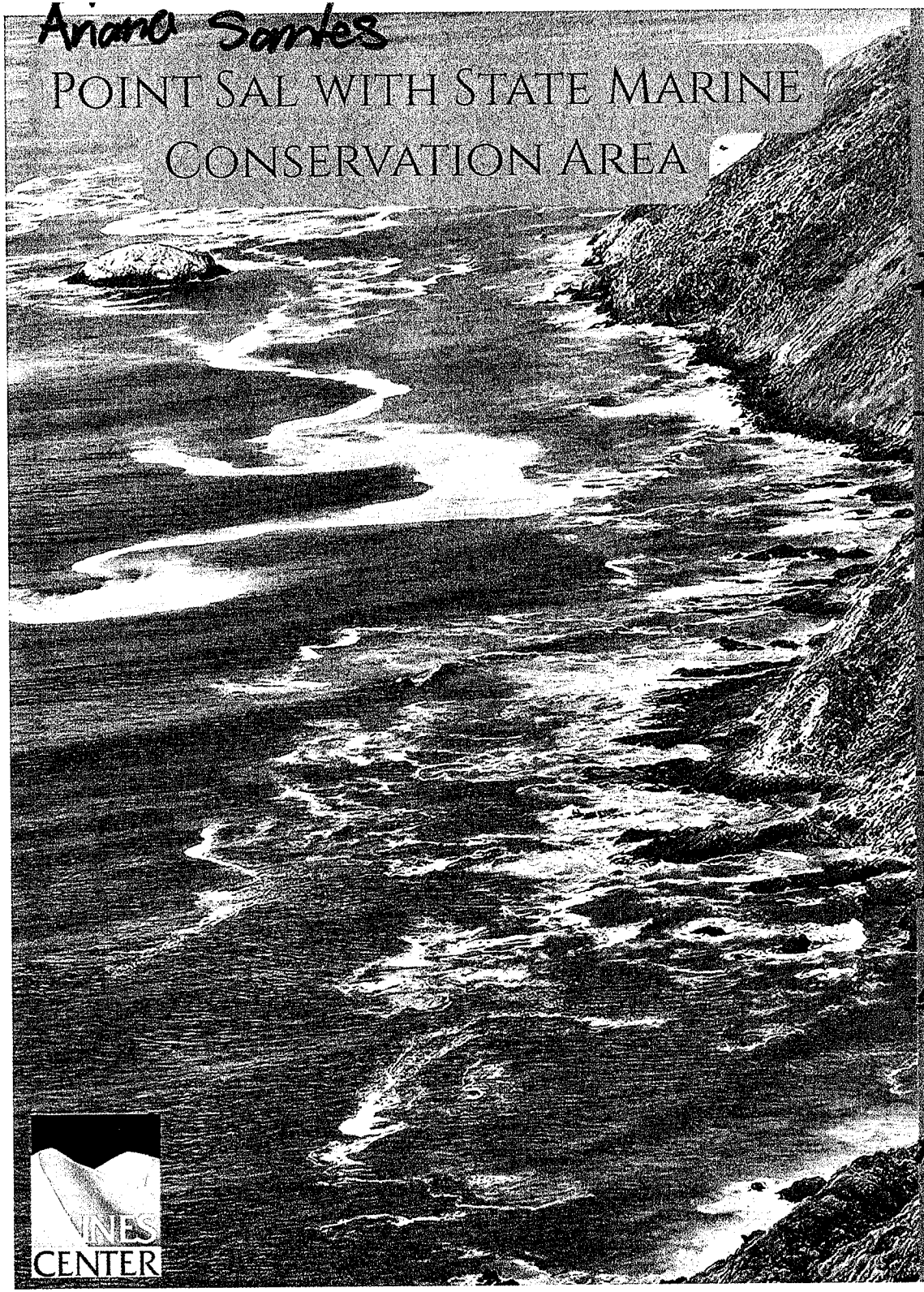


UNPROTECTED POINT SAL

I think that Protection for Point Sal is important because I want the sea like that live there to have a safe and clean place to live, birth, and raise their young. I hope that they get the protection that they deserve and get to live longer and stronger lives.

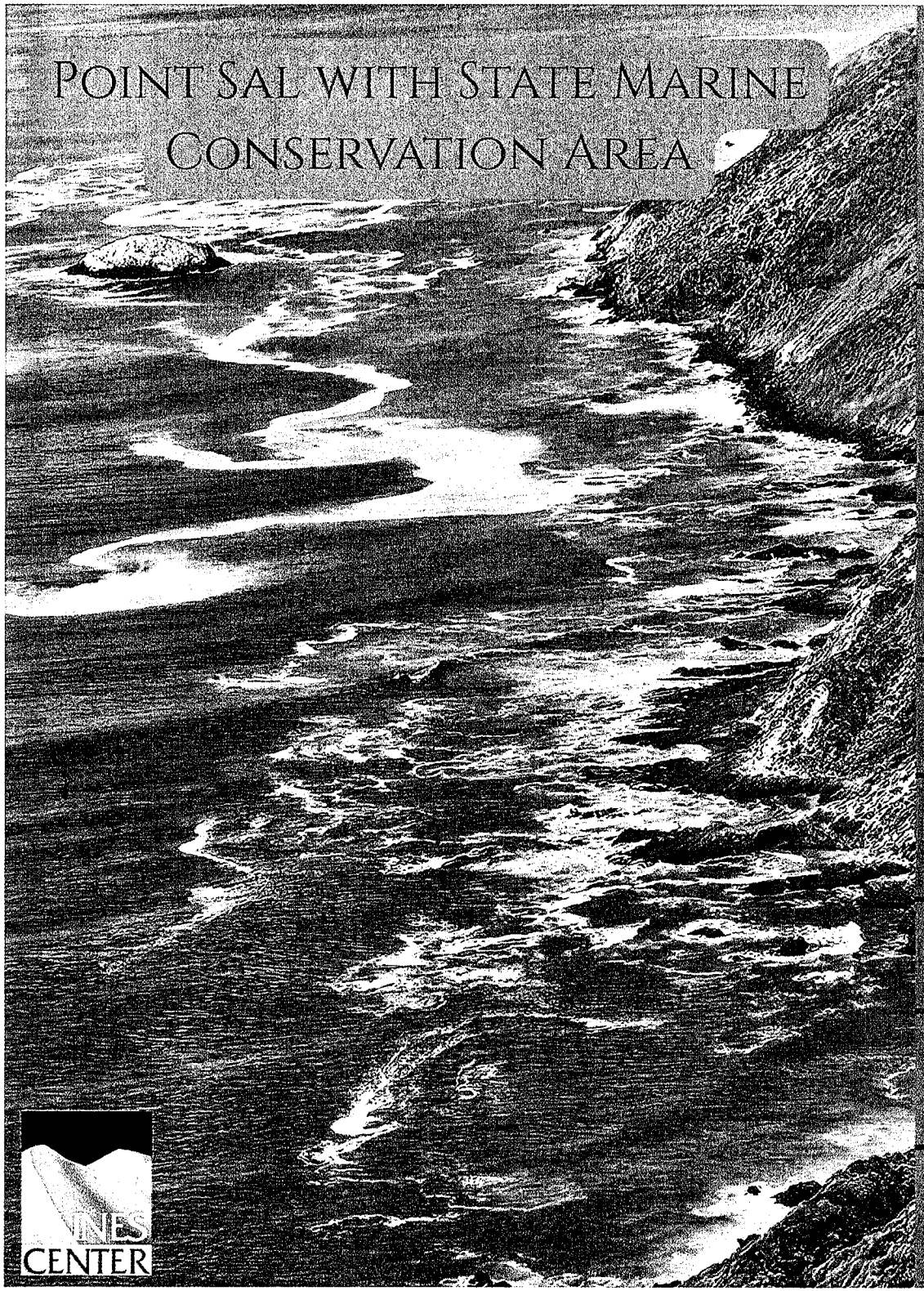
-Ekkie Avila

Ariana Santos



UNPROTECTED POINT SAL

If we do not protect Point Sal then we might lose some of the animals who live their That would be terrible if we lost animals to some cruel people so I can the bottom of my heart please protect this ecoSystem.



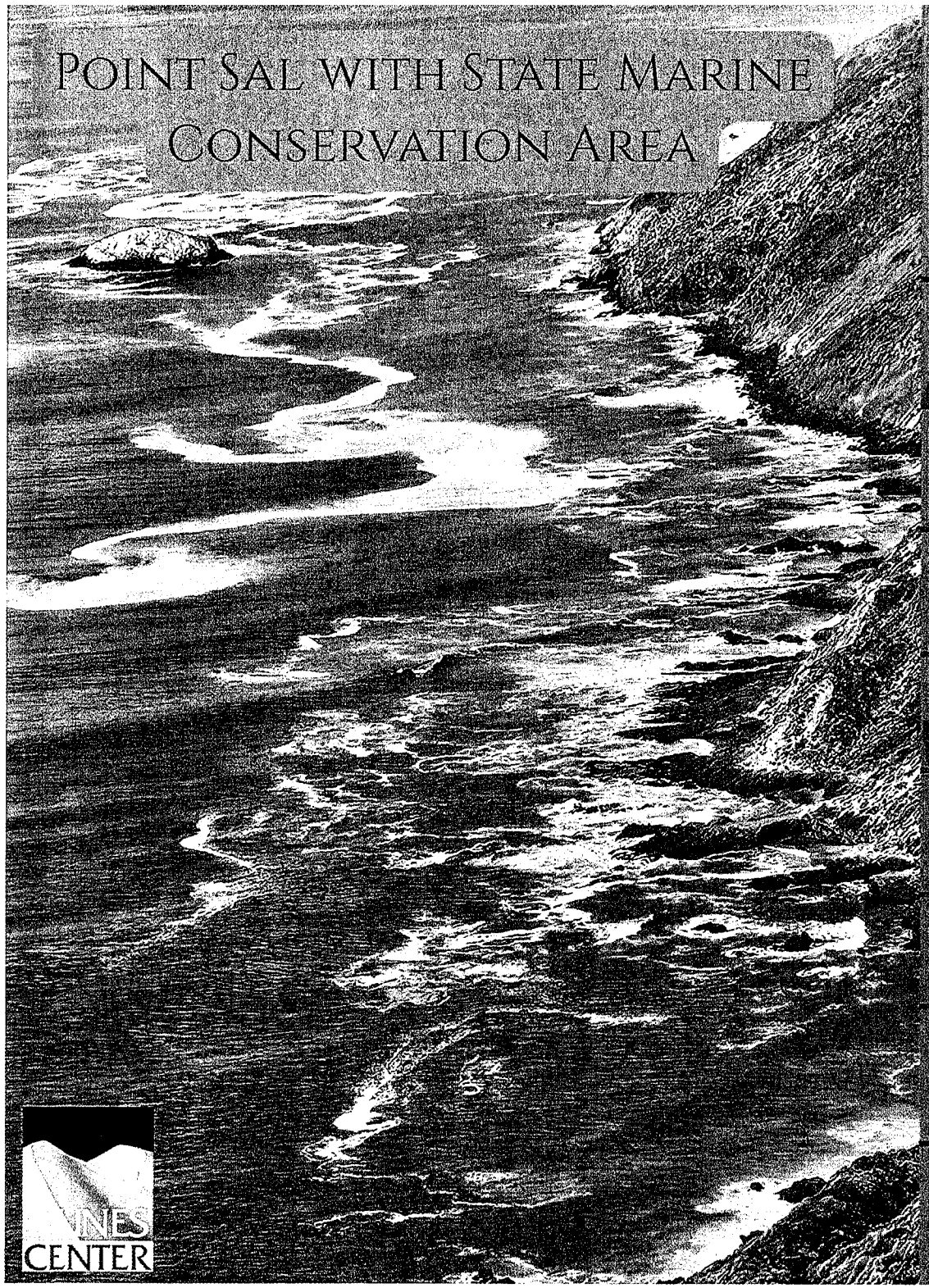
Point Sal with State Marine Conservation Area

beta

Unprotected Point Sal

This area should be ~~for~~ protected ~~be~~ so that animals have a safe ~~Place~~ place to live.

MMES CENTER



Point Sal with State Marine Conservation Area

Unprotected Point Sal

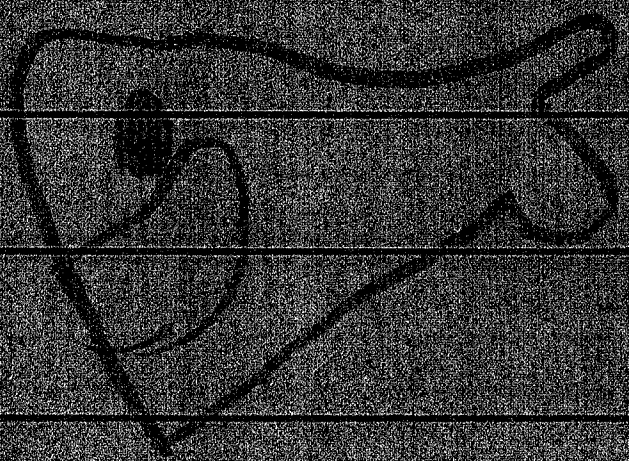
Wccc Side

Mar y Bure N

Point Sal is

beautiful

what



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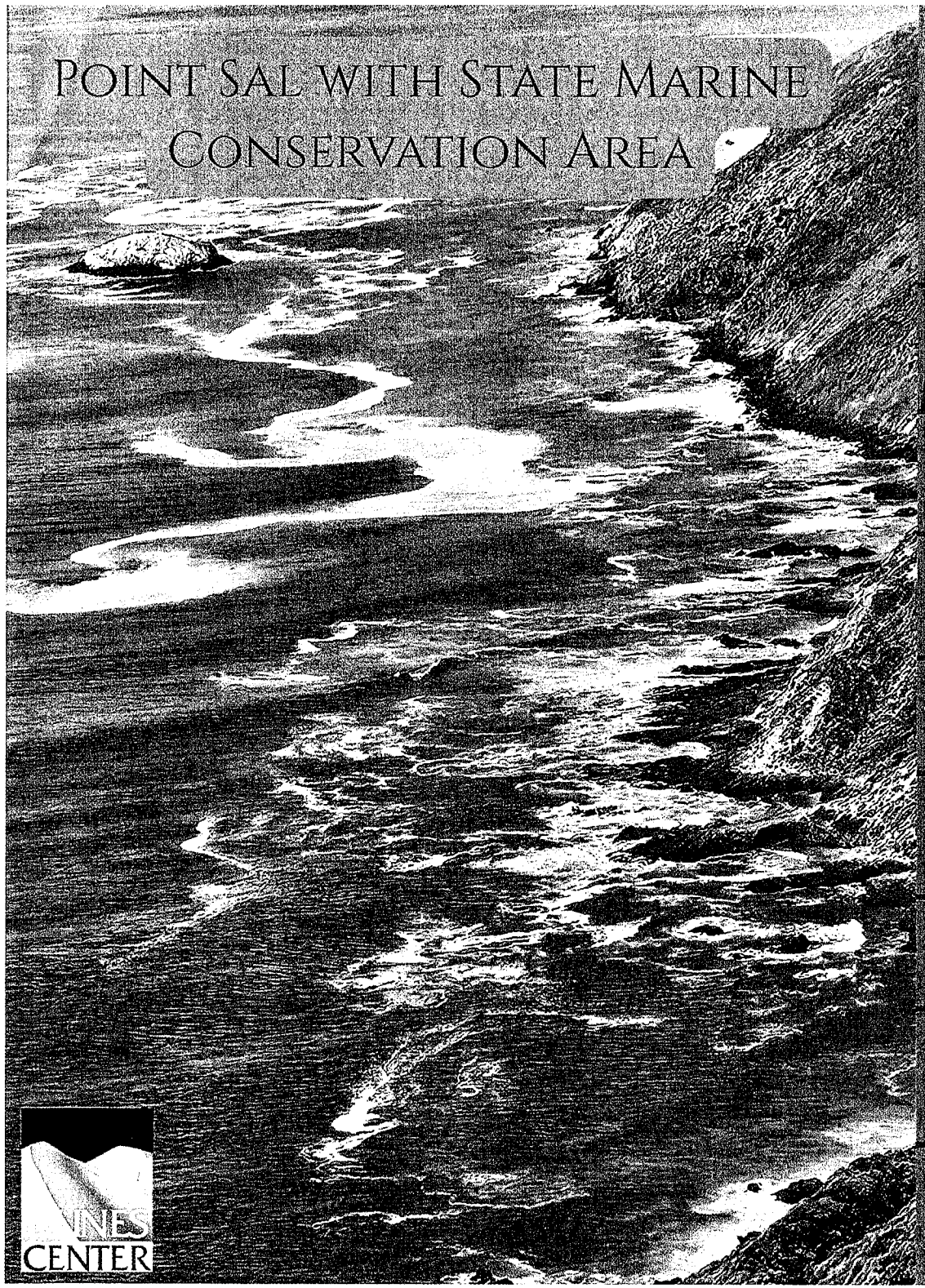


POINT SAL WITH STATE MARINE CONSERVATION AREA

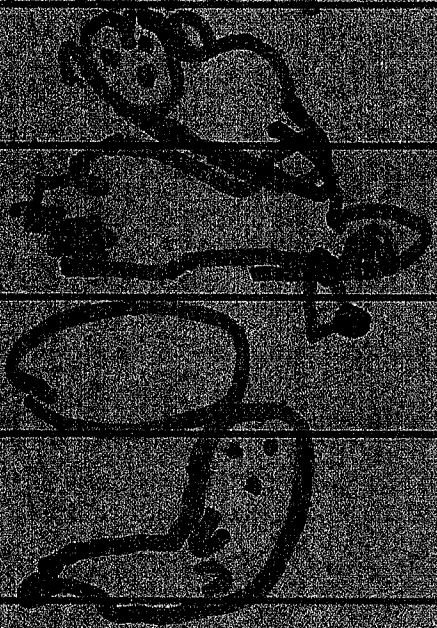
UNPROTECTED POINT SAL

Gerardo Angeles

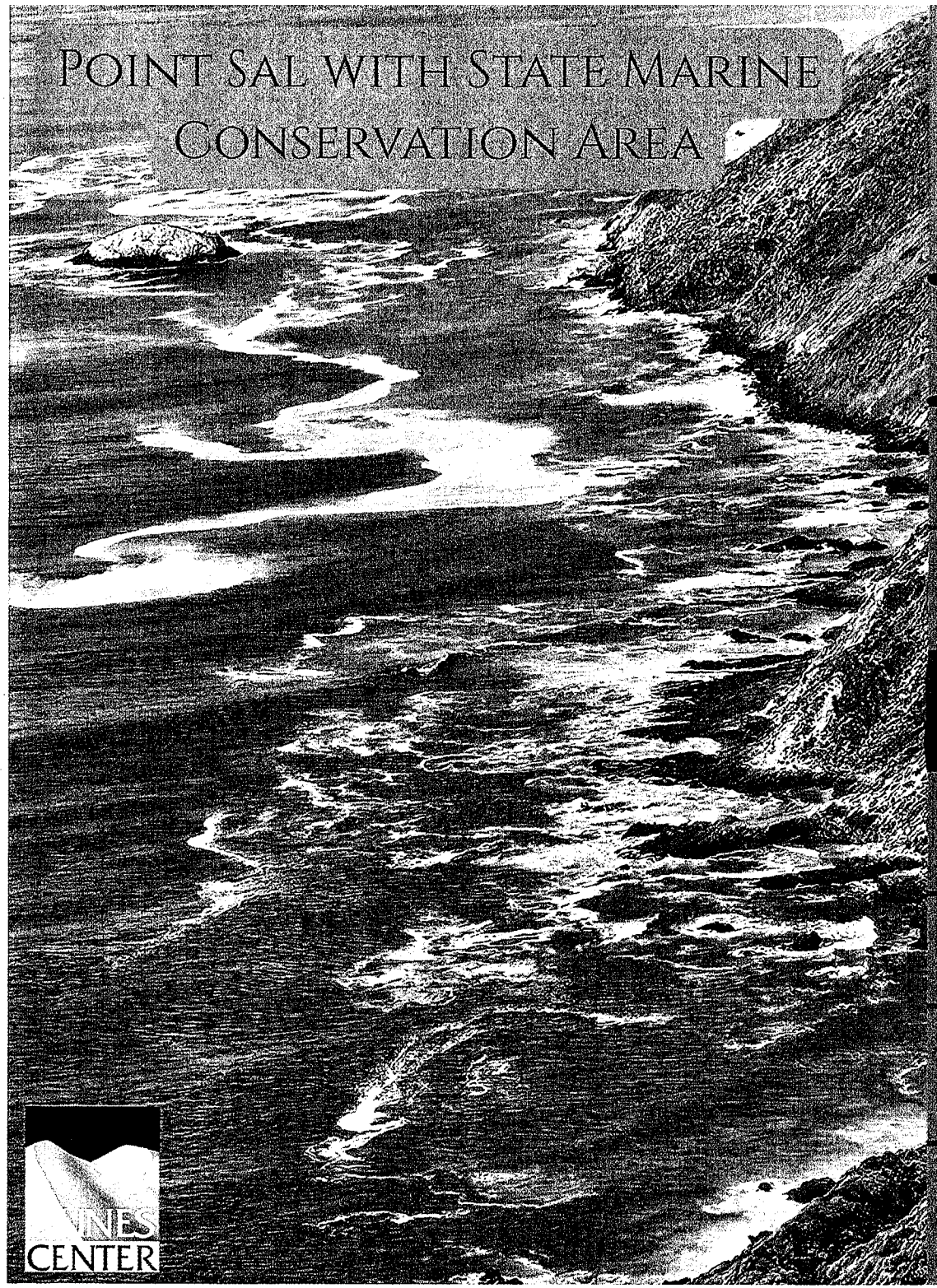
Mary Burch

Sea otter

I love Point Sal



MARINE CENTER



My name is Cami

UNPROTECTED POINT SAL

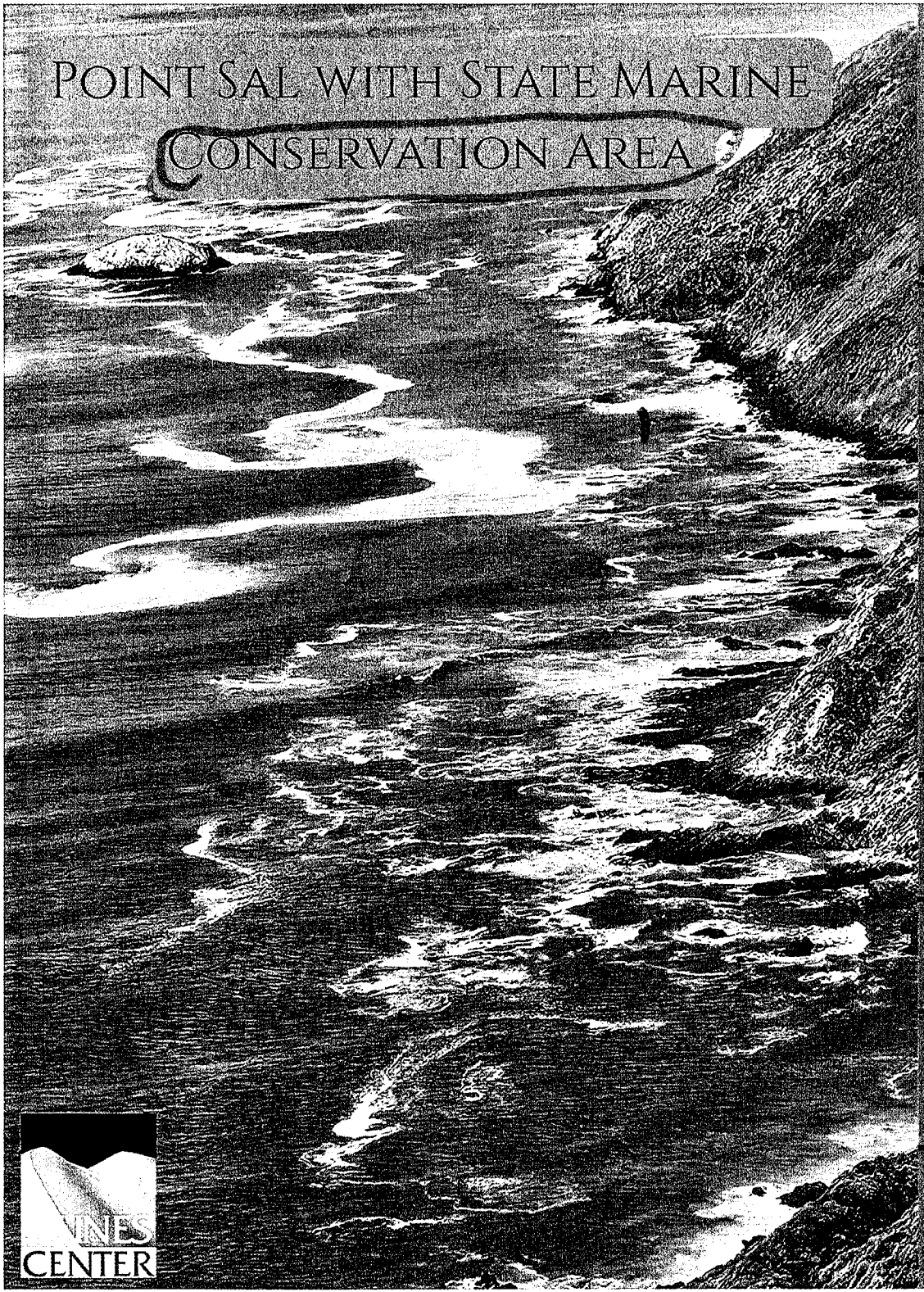
Camila

I go to Mary

Buren Point

Sal. Help Keep

Point Sal beautiful!



Point Sal with State Marine Conservation Area

Unprotected Point Sal

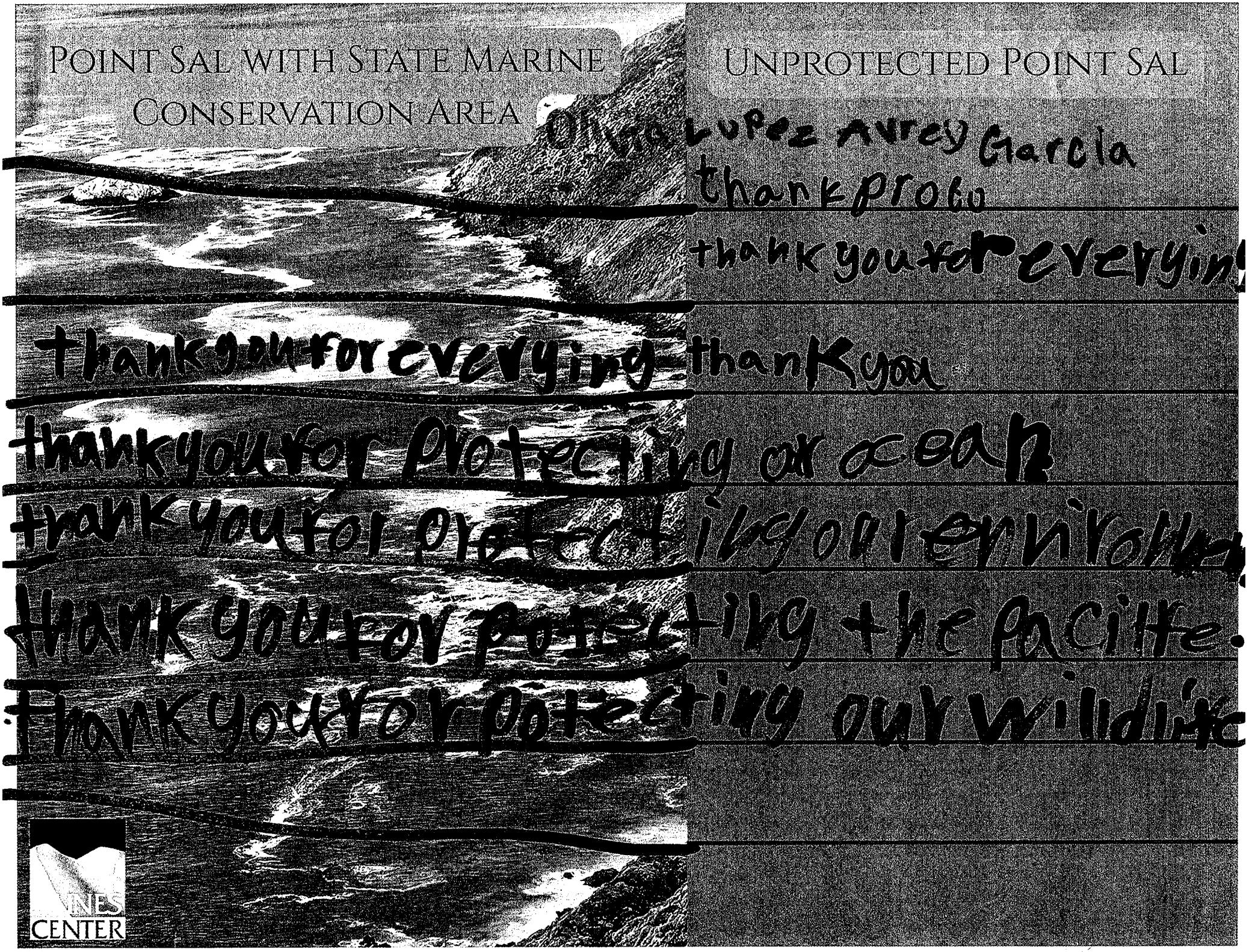
Ivan Rivera

Fresh Water

Pool Favorite

Animal is a fox

VNES CENTER


POINT SAL WITH STATE MARINE CONSERVATION AREA
UNPROTECTED POINT SAL
Olivia Lopez Aurey Garcia
thank you
thank you for everying
thank you for everying
thank you for protecting our ocean
thank you for protecting our environment
Thank you for protecting the pacific.
Thank you for protecting our wildlife
NES CENTER

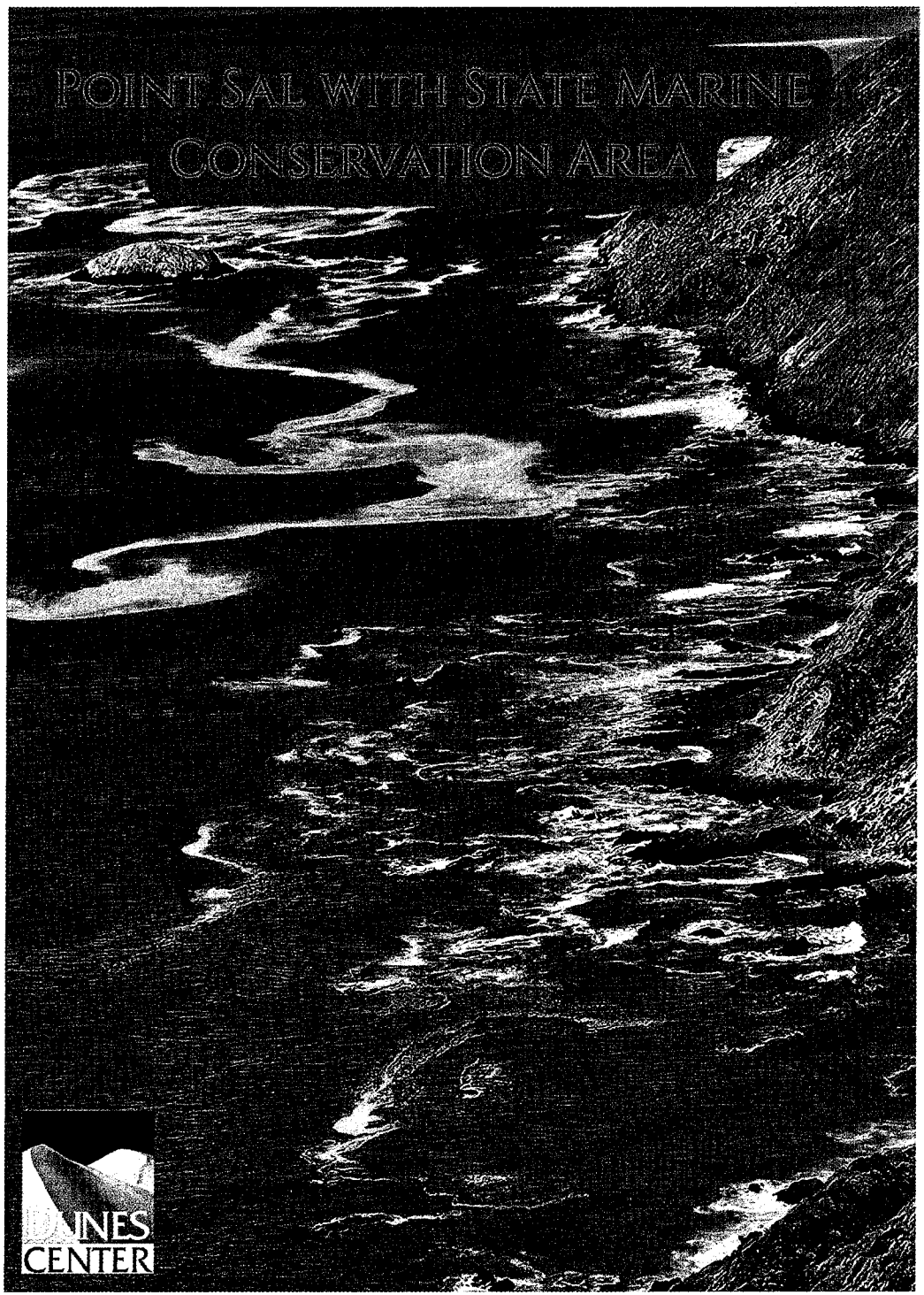
UNPROTECTED POINT SAL

Brycen Jaumin

Thank you for protecting

Thank You For

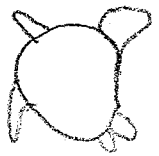
Protecting

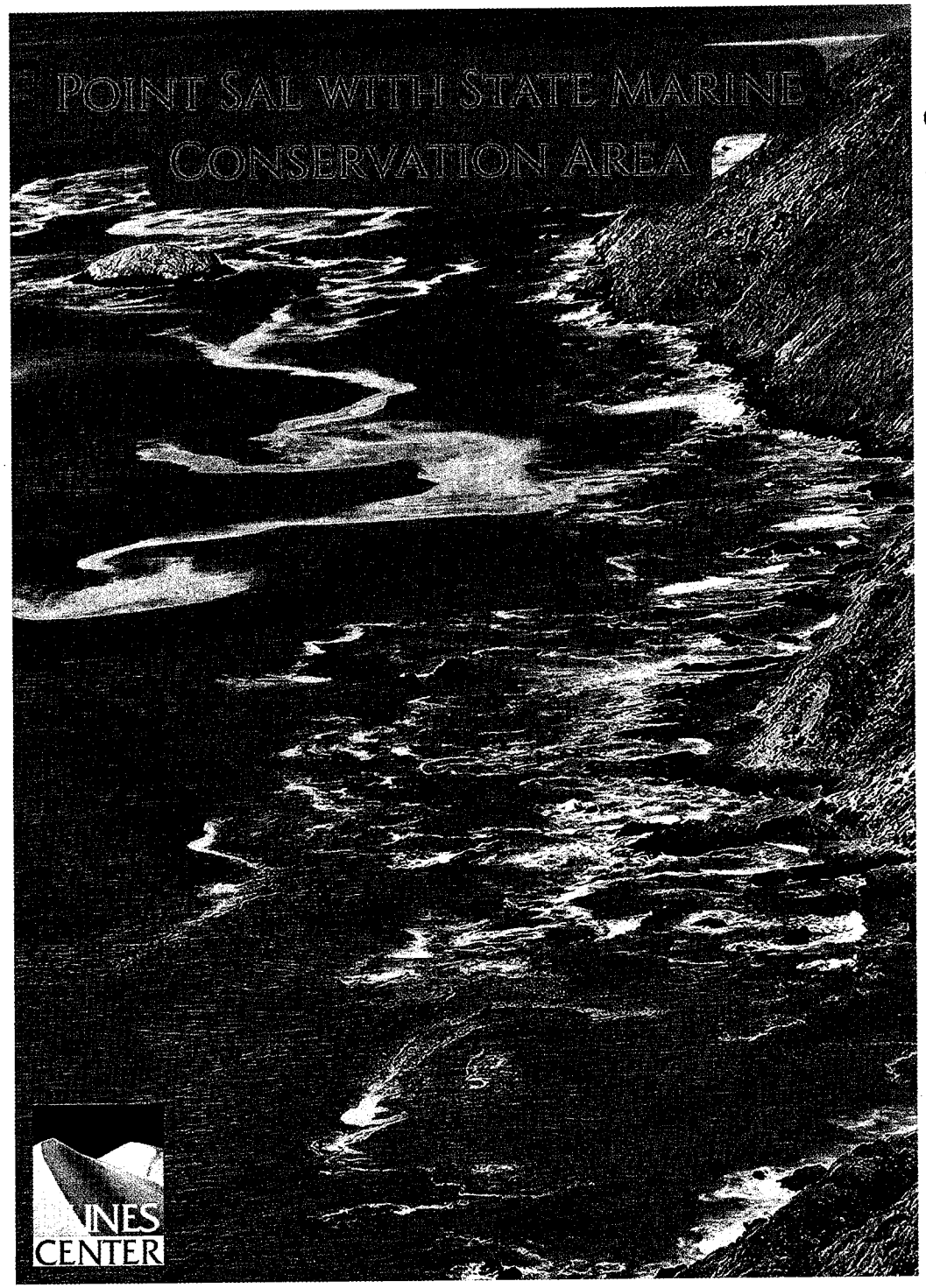


NAME: Jordan Bernal

GRADE & SCHOOL:: fairlawn mr stephenson

Point Sal is important because they protect turtles and turtles are threatened



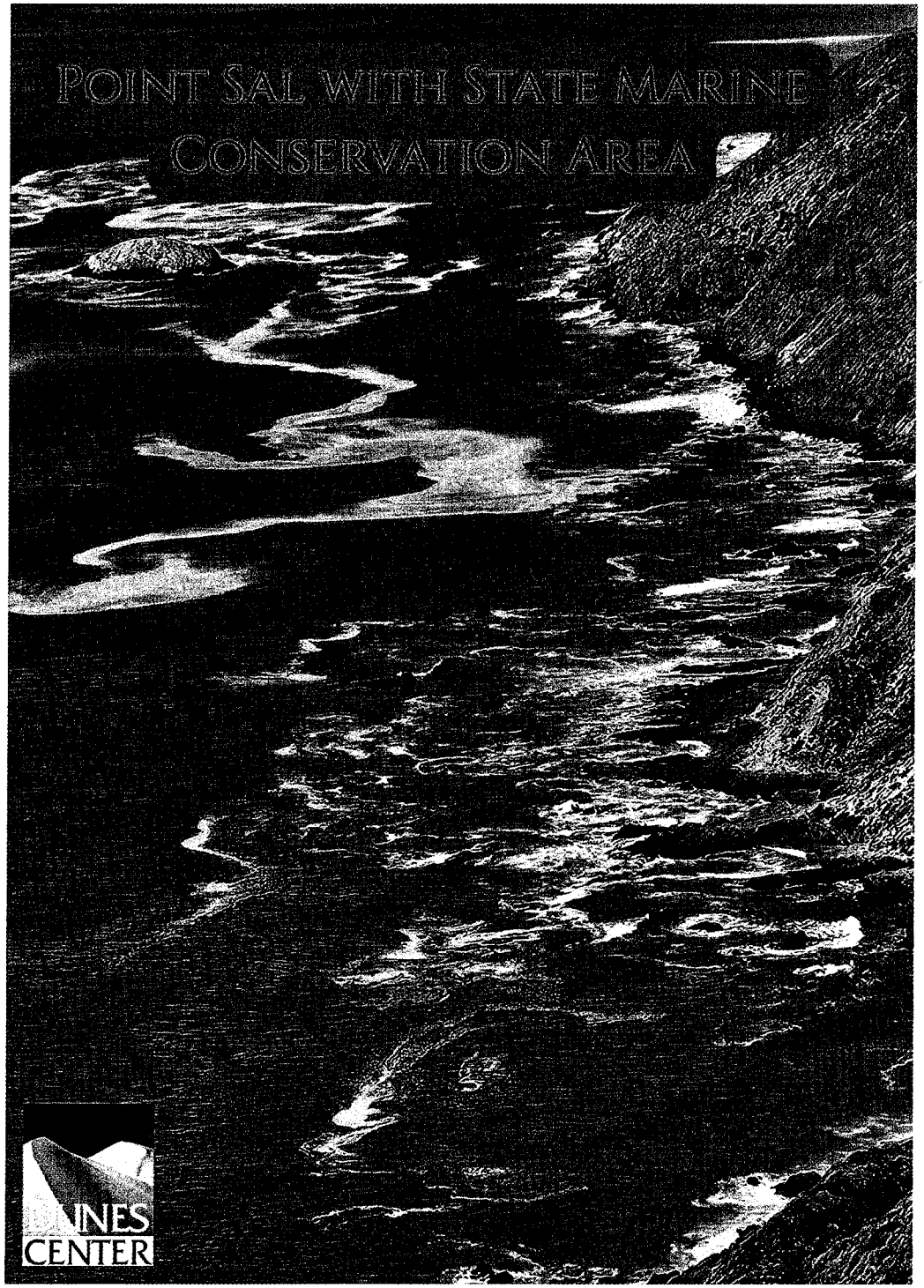


NAME: Catia Hernandez

GRADE & 6th

SCHOOL: Fairlawn

I want to save the sea otters because they keep the ecosystem intactes

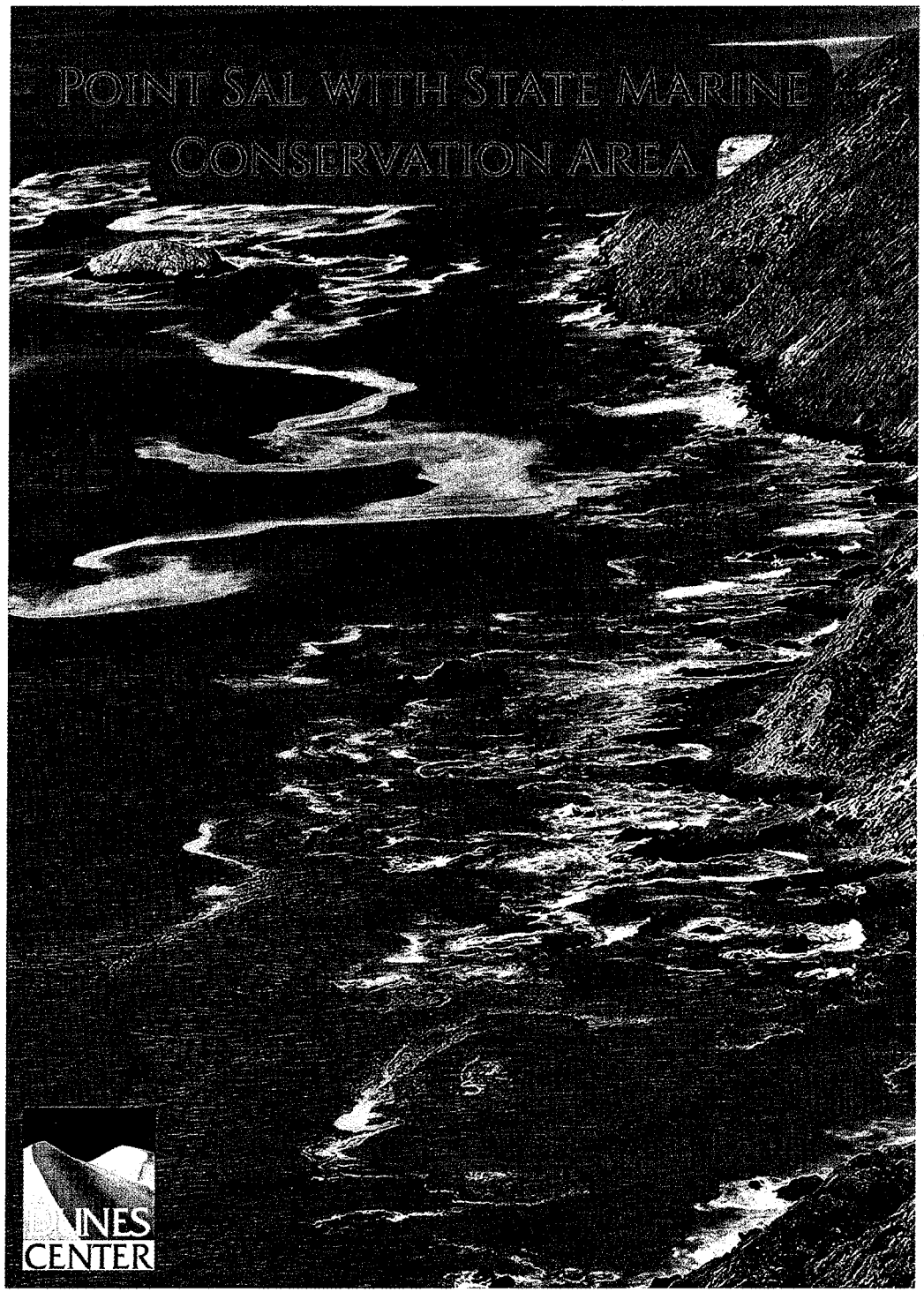


NAME: Alena

GRADE & 6th

SCHOOL: Fairlawn Mr. Stephenson

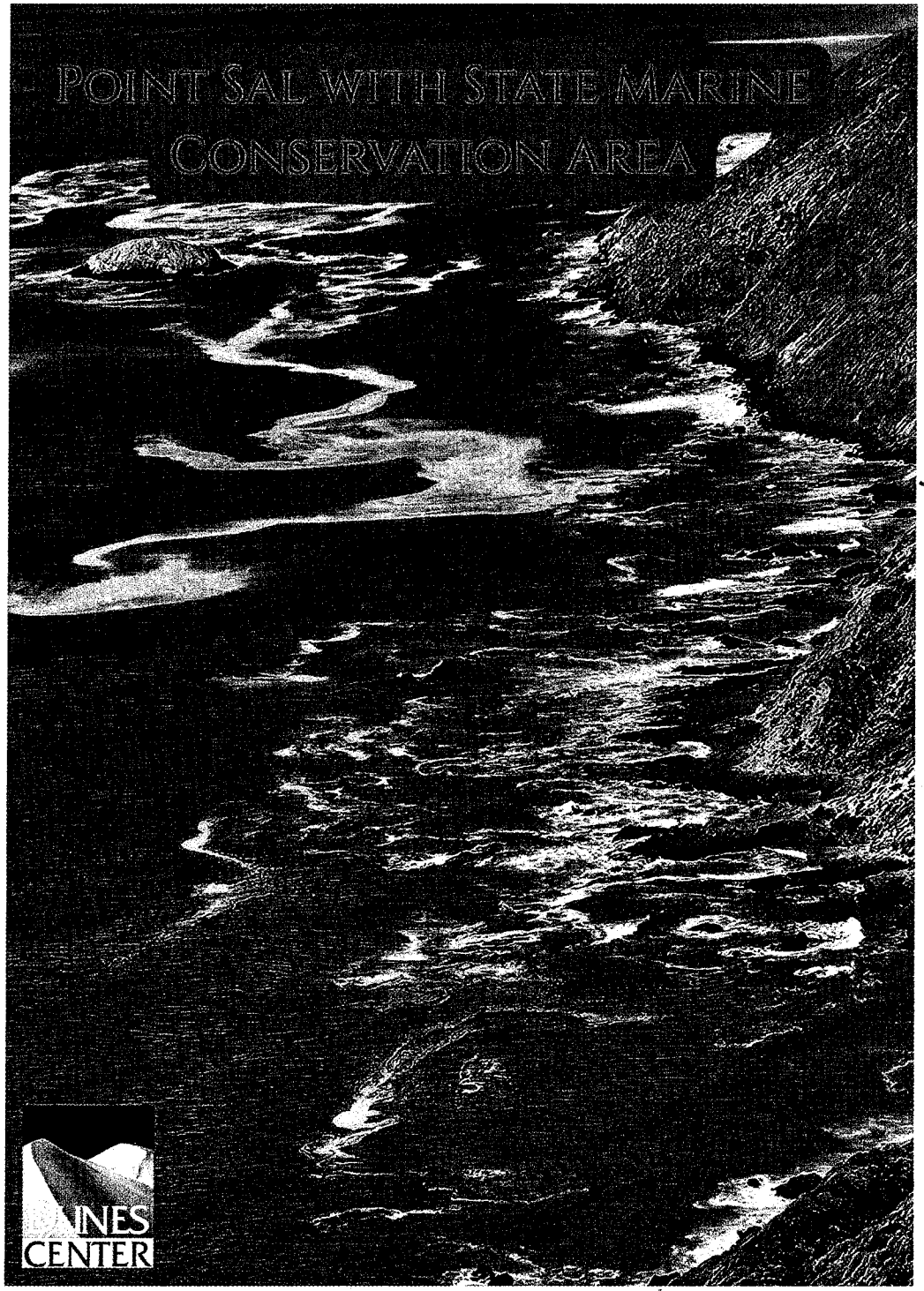
Sea otters should be Protected because people kill them for their soft fur which leads to a risk of extinction.



NAME: Jery Lopez

GRADE & SCHOOL: 6 Grade Stephenson

Batrars are in D and plz protect them



NAME: Amario Hernandez

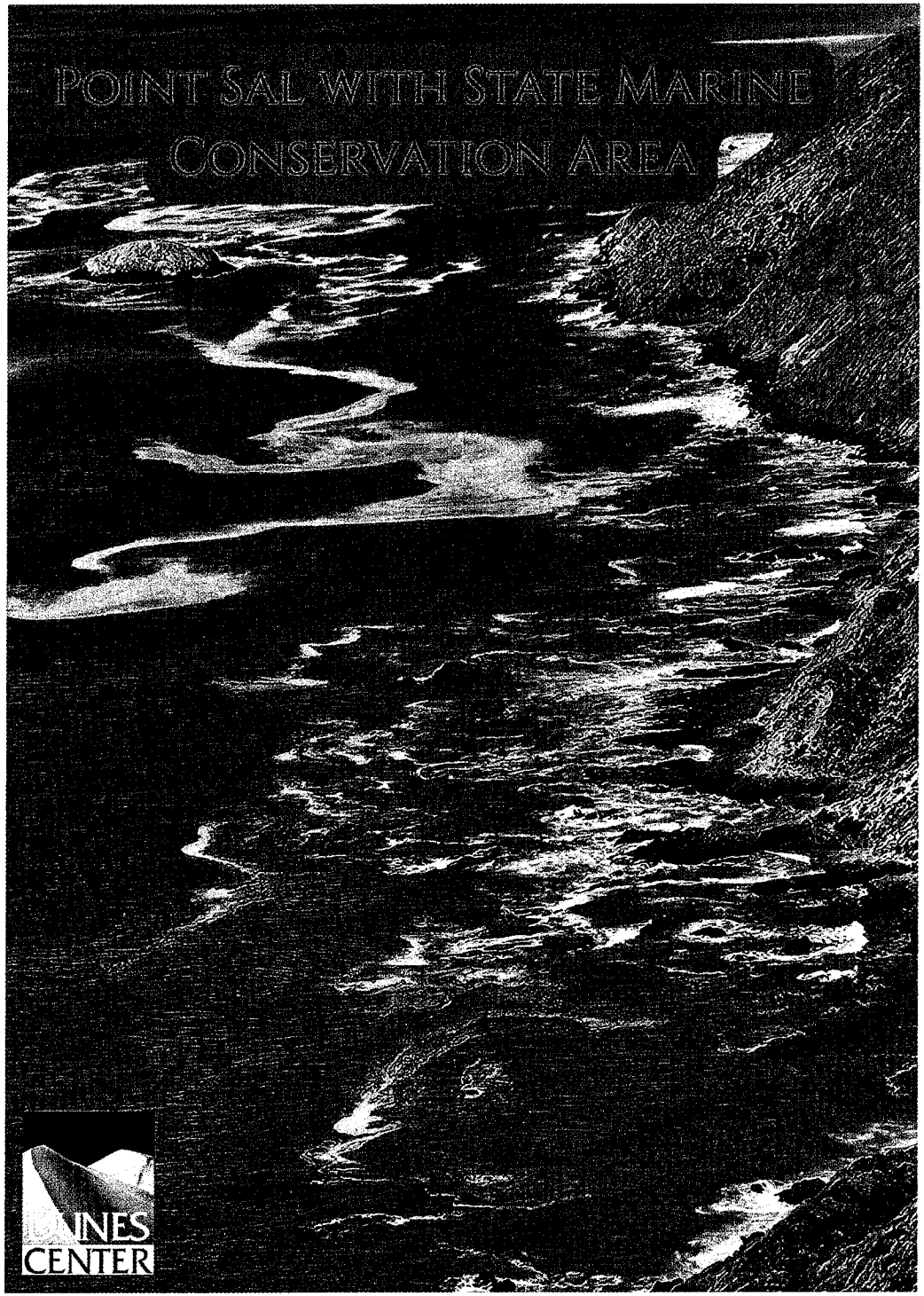
GRADE & 6th/Mr. Stephenson

SCHOOL: Fairlawn elementry School

Dear, Dunes center

I want to save the sea otters
becuase the Pepole are killing
them for there fur and keeping
them away from there enviernment.

:)

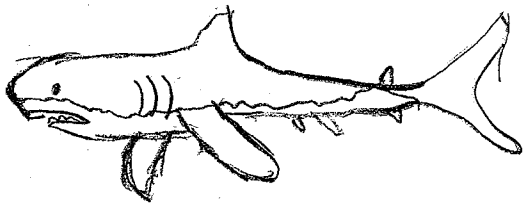


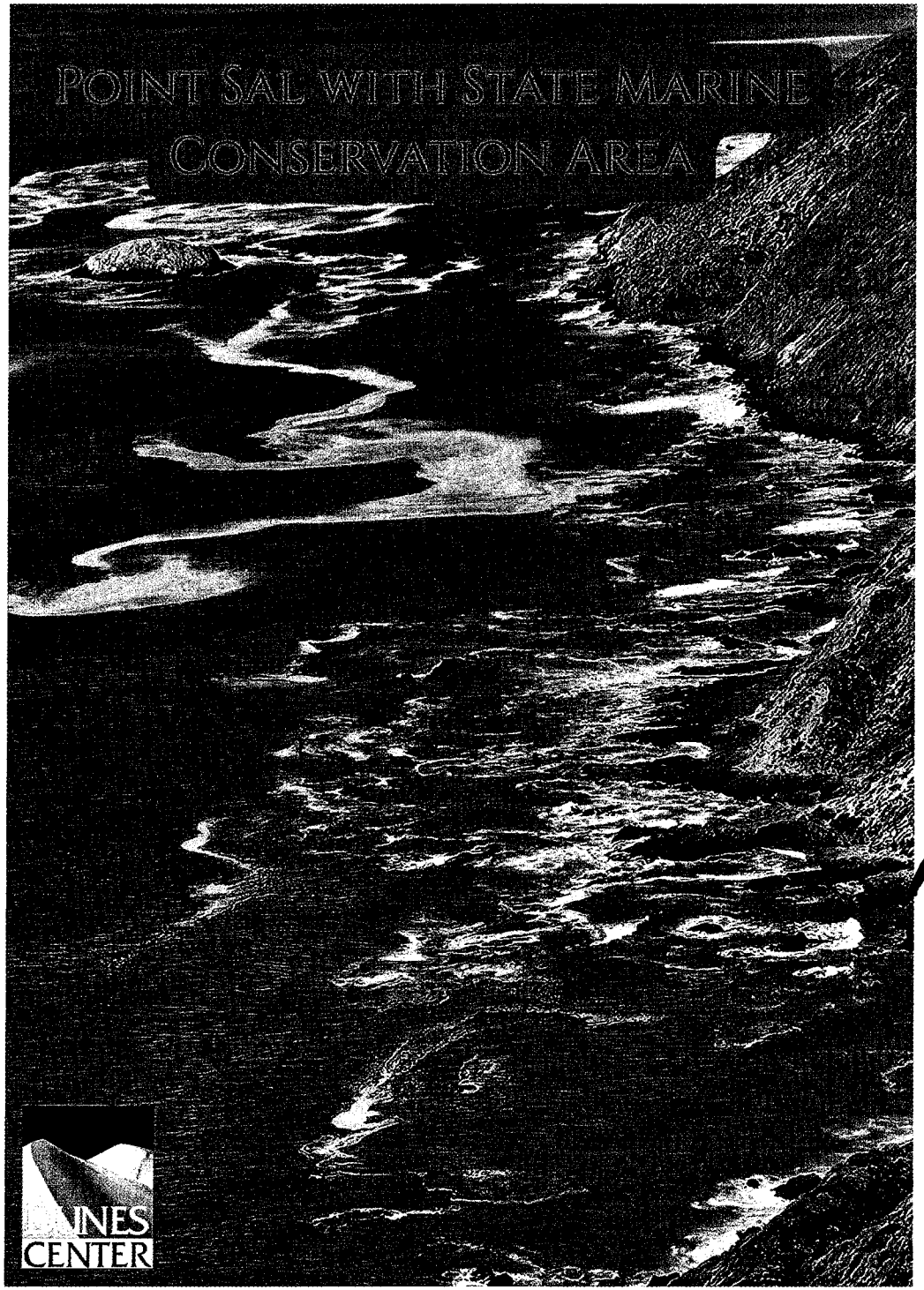
NAME: Brandon castillo mecca

GRADE & SCHOOL: 6th grade fairlawn Mr teacher stephenson

Plz save this shark

Because I like sharks



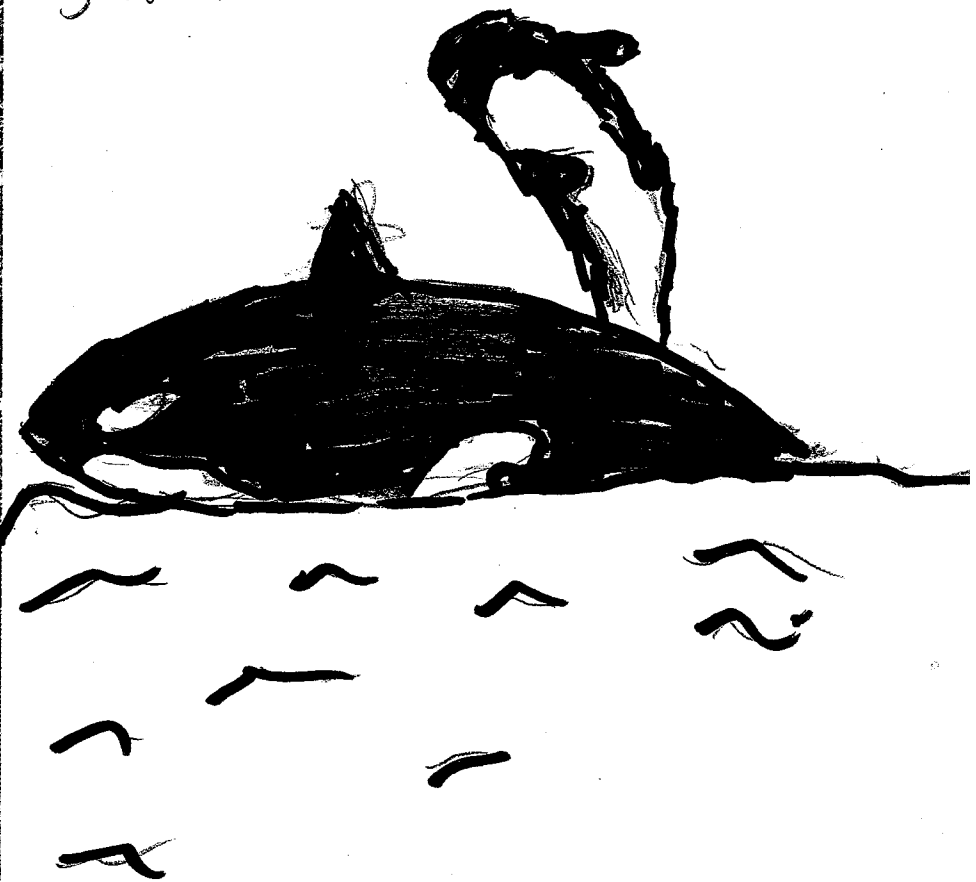


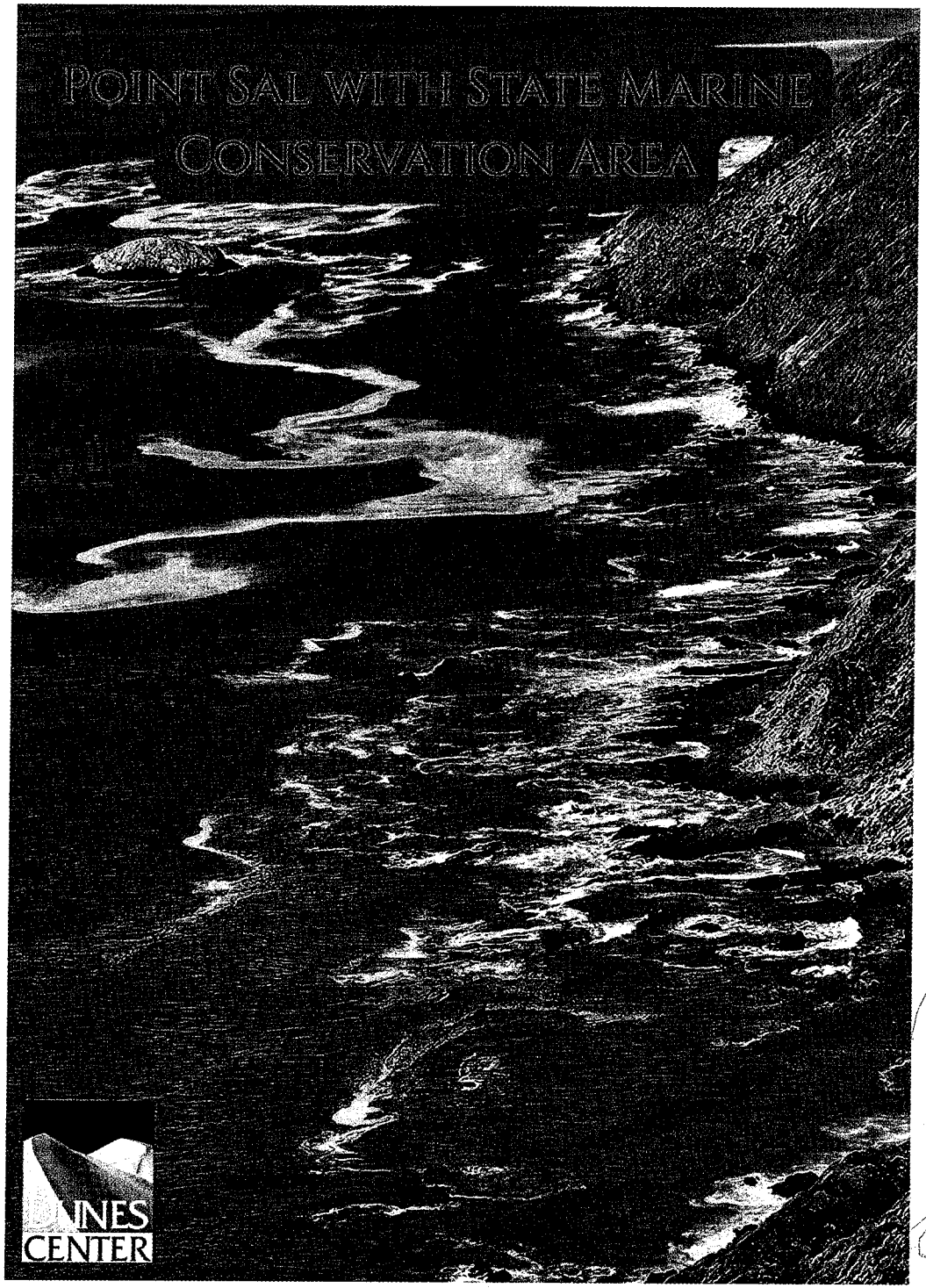
NAME: Jayden M

GRADE & SCHOOL: 6 - Stephenson - Fairlawn

Orca

Save the Orcas



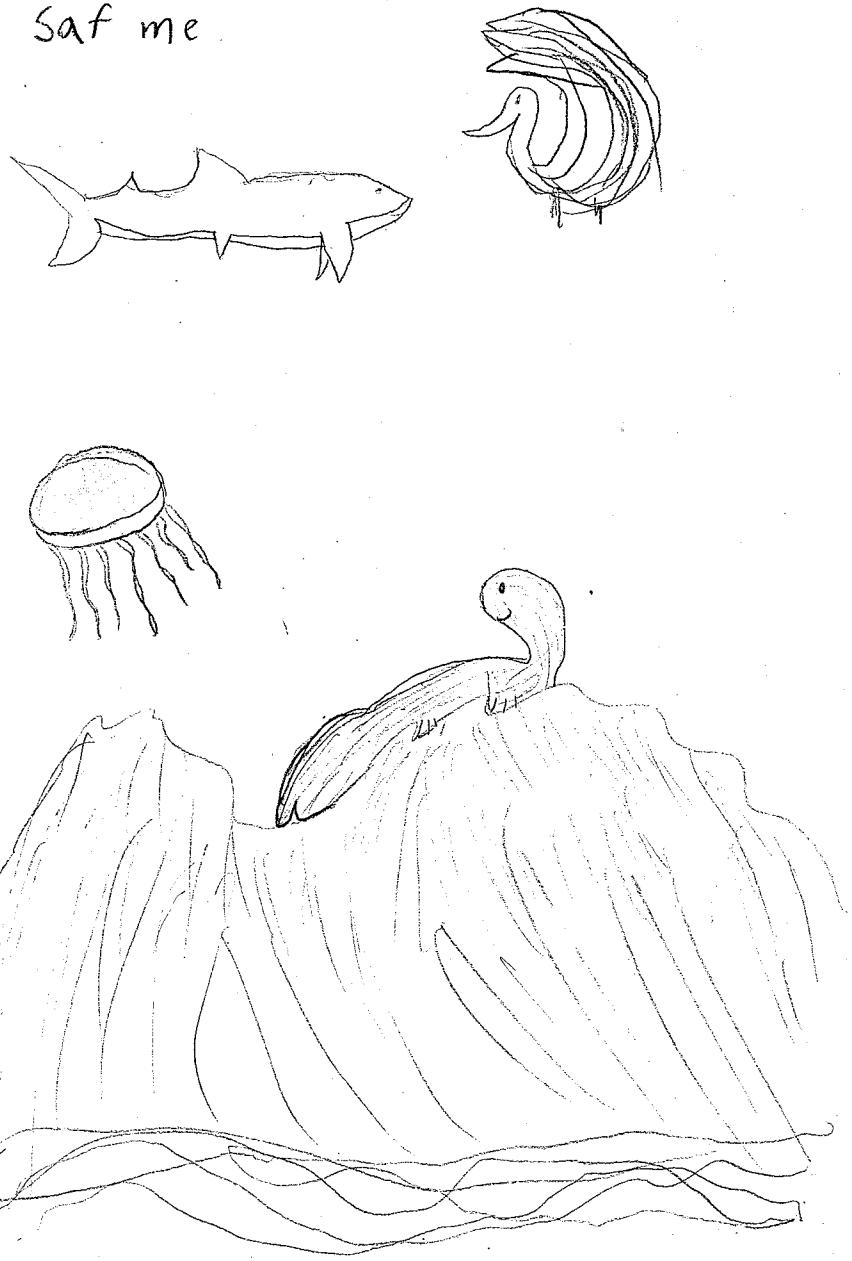


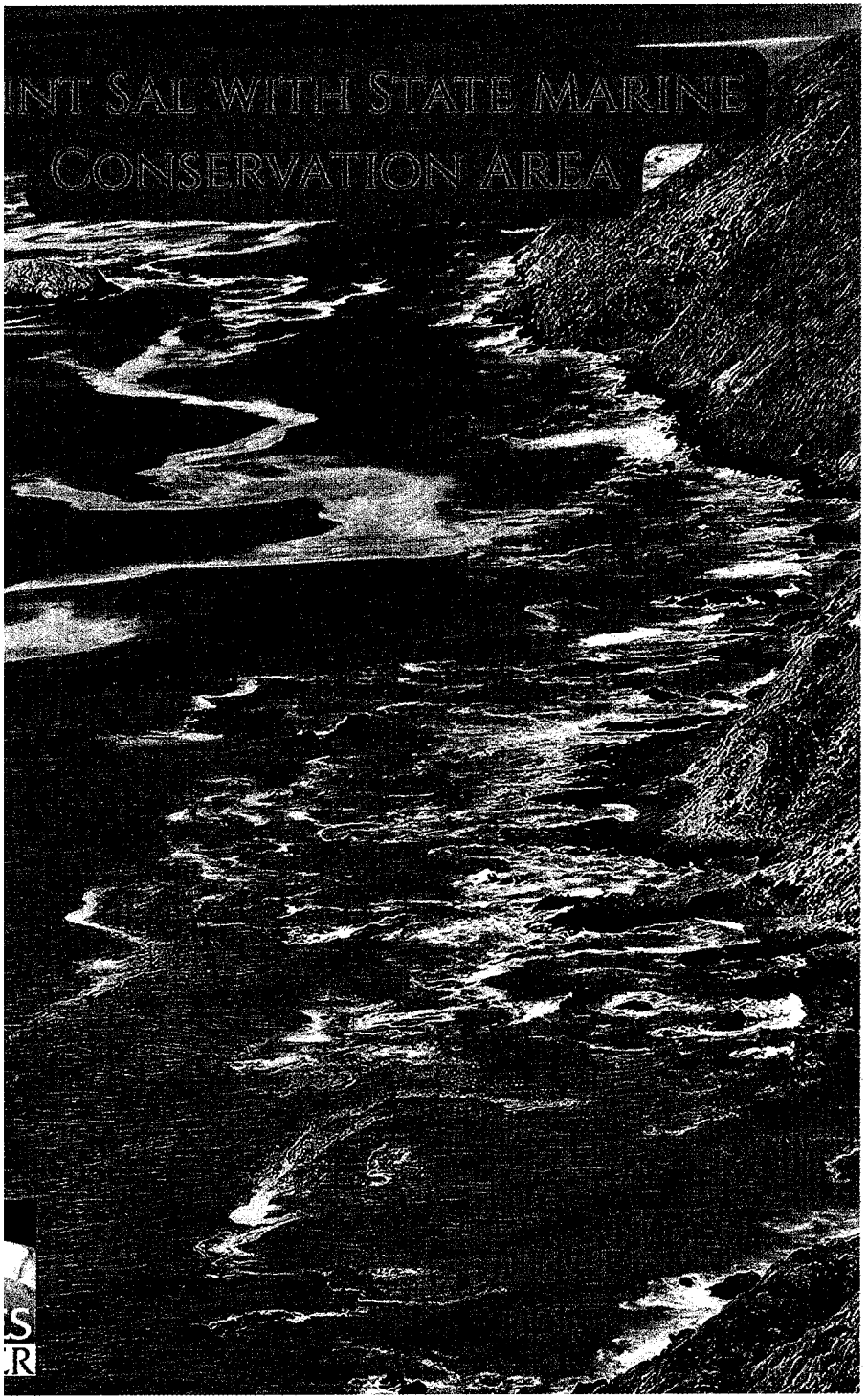
NAME: Dafne Lopez

GRADE & : 4th 6

SCHOOL: MS. Lee

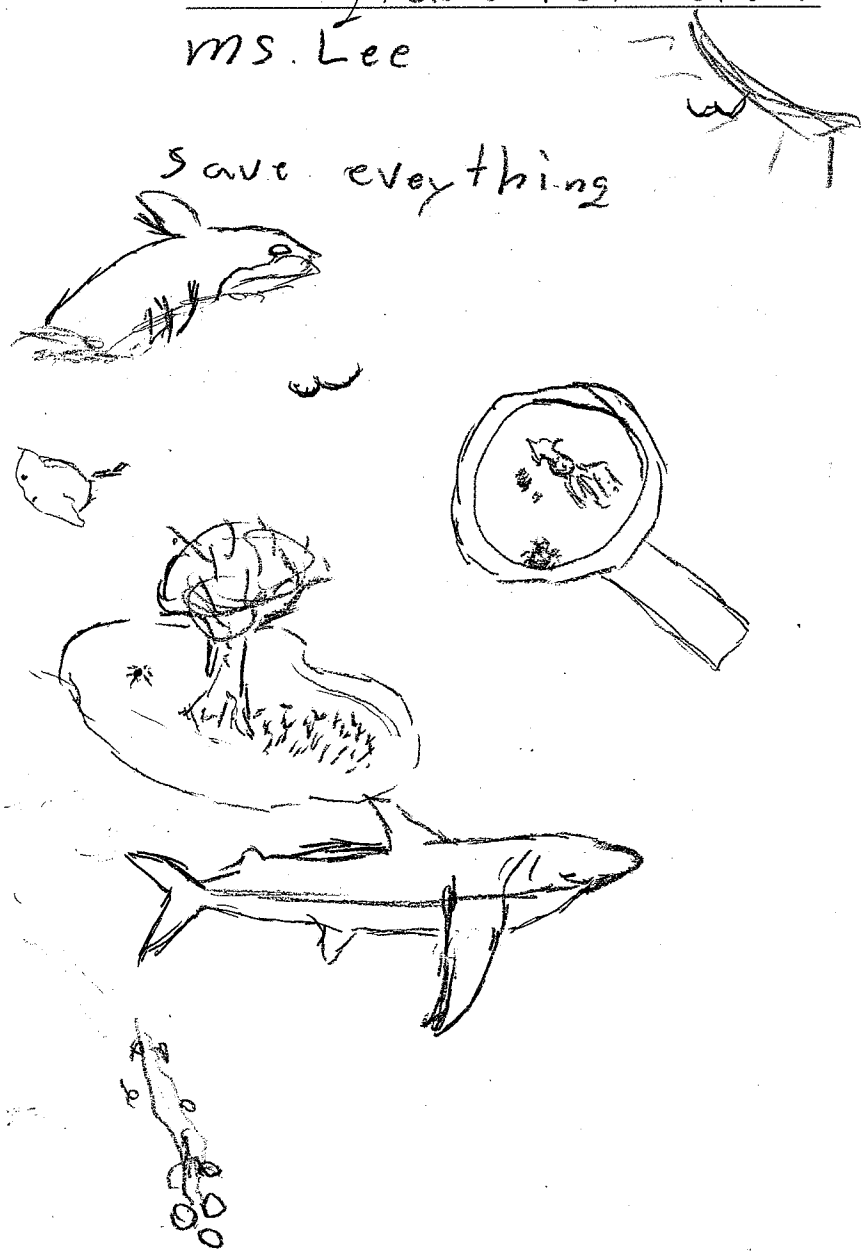
Saf me

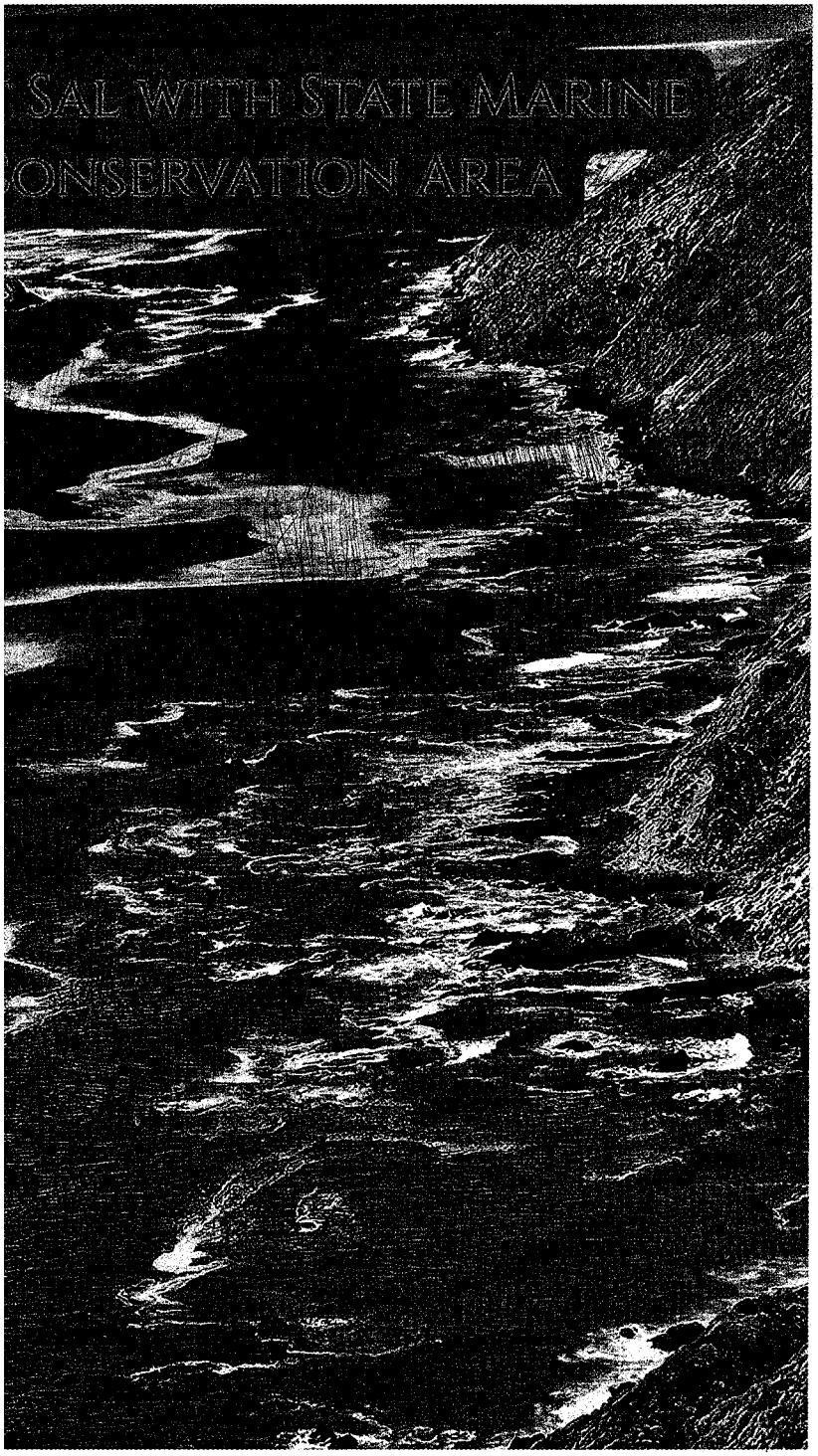




NAME: Reynaldo Ordaz

GRADE & SCHOOL: 6th grade Fairlawn
ms. Lee

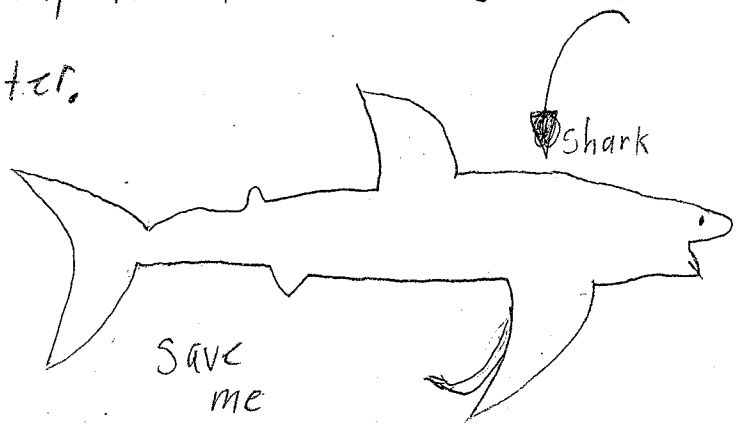




NAME: Krystal

GRADE & SCHOOL: 6th fairlawn Ms.Lee

Point Sal should be protected because one day me and my family want to visit Dunes Center.



20 April 2026

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

Submitted electronically to fgc@fgc.ca.gov

Re: Proposed Changes to California's Marine Protected Area Network

Dear President Sklar and Honorable Commissioners,

We respectfully submit this letter for consideration in the decision making process for the petitions submitted in response to the adaptive management process following the Decadal Review of the California Marine Protected Area (MPA) Network. As marine scientists at the University of California, we are writing to highlight the myriad demonstrated benefits of MPAs documented in the scientific literature that we are confident support maintaining the existing MPA network and provide evidence for the value of expanding protections in California's marine and coastal areas.

MPAs Offer Diverse, Proven Benefits to California's Coast and Ocean

One of the primary benefits of MPAs is **fisheries spillover.** This has been documented in many other ecological contexts (Lynham & Villaseñor-Derbez 2024, Di Lorenzo et al. 2020), but specifically in California has been observed as **a boon to the California commercial and recreational spiny lobster fisheries** (Lenihan et al. 2021, Kay et al. 2012). The recreational fishery has been valued at $40 million (CDFW 2016) and the commercial fishery is among the top commercial fisheries by ex-vessel value in the state (CDFW 2021). Research has demonstrated that in Southern California, a 35% reduction in fishing area resulting from MPA designation was compensated for by a 225% increase in total lobster catch after 6-years, thus indicating at a local scale that the trade-off of fishing ground for no-fishing zones benefitted the fishery (Lenihan et al. 2021). Analysis of SCUBA diving charter boat data in the Northern Channel Islands demonstrated the significant preference of recreational lobster hunting for the border zones of MPAs (Morse et al. 2024).

Beyond fisheries, there are myriad non-extractive benefits of MPAs in California. The first is **biodiversity and ecosystem health**. To reiterate the findings of science conducted as part of the Decadal Review, Smith et al. (2025) concluded that **MPAs increased fish biomass across the whole California MPA network.** Older MPAs, and those with a greater diversity of habitats, showed the highest amount of fish biomass, especially in fishery-targeted species, like rockfishes. This suggests that the protection from fishing really does help boost these populations' health (Spiecker et al. 2025). Stronger protections also correlated with more pronounced results: MPAs with more stringent protections saw greater gains, as did areas that had previously experienced heavy fishing. Older and larger MPAs also produced more significant results (Ziegler et al. 2024).

Although older MPAs generally realize greater biodiversity benefits, Caselle et al. (2015) evaluated the impacts of the Northern Channel Islands MPAs in the 10 years after their designation in 2003. Here, **biomass of targeted fish species increased significantly inside all MPAs, with a rate approximately four times faster than outside MPAs**.

MPAs provide significant benefits to **recreation and California's marine ecotourism industry.** Marine and coastal ecotourism is one of the largest sectors in the ocean economy, accounting for 50% of all global tourism. In California, marine and coastal tourism contributes approximately $26 billion in GDP per year (NOAA 2018). Research from our lab analyzed millions of data points on where SCUBA diving charter boats put divers in the water in the Northern Channel Islands and found that these **SCUBA charters significantly prefer visiting MPA dive sites over non-MPA dive sites** (Morse et al. 2024). Dive vessels engaged in ecotourism activities (e.g., wildlife viewing, underwater photography) prefer areas protected inside MPAs, and dive vessels primarily taking clients recreational lobster hunting prefer MPA border zones where the spillover effect is occurring (Lenihan et al. 2021). When asked about their reasons for targeting the MPAs, boat captains cited higher abundance of big fish and marine megafauna like giant sea bass and sheephead, and the health of the kelp forests in these areas.

MPAs offer **ecosystem resilience to environmental perturbations such as ocean warming and marine heat waves.** By removing one source of stress in fishing, this allows ecosystems to have a healthier baseline and increase their likelihood of withstanding or recovering quickly from extreme conditions. Fully protected MPAs significantly enhance kelp forests' resistance to and recovery from marine heatwaves, particularly in Southern California (Kumagai et al. 2024). In this region specifically, this is likely driven by the high densities of urchin predators (lobster and sheephead) inside fully protected MPAs, which keep urchins in check and prevent excessive kelp predation (Caselle et al. 2015). Additionally, Ortiz-Villa et al. (2025) found that California MPA implementation led to a 8.5% increase in kelp coverage compared to reference areas.

MPAs – particularly larger MPAs or well-connected networks of MPAs – can also provide **population resilience by enhancing genetic diversity.** Because fecundity increases with maternal age and size, protecting older, larger individuals in a given population within MPAs contributes to increased overall reproductive output and ensures the necessary supply of recruits to maintain healthy population sizes and genetic diversity (Koeck et al. 2024). Larger population sizes with a broader age distribution, as commonly found in fully and highly protected MPAs, may speed up recovery following disturbance through maintenance of greater demographic and genetic diversity and reproductive output and juvenile recruitment (Baskett & Barnett 2015).

Taken individually, we believe that these benefits of MPAs make a strong case for the value of maintaining the existing network and taking advantage of opportunities to establish new ones. Particularly in the face of climate change, pollution, and coastal development, the combined positive benefits of MPAs will position California's invaluable coastal and marine areas to achieve the resilience necessary to weather these now inevitable stressors.

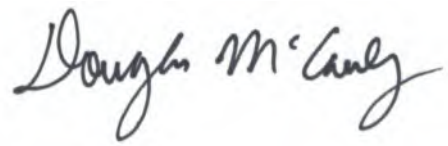
We Support the Mishopshno SMCA and Point Sal SMCA Petitions

We would like to conclude this letter with an endorsement of two of our local petitions: Mishopshno SMCA and Point Sal SMCA. The Mishopshno SMCA would help advance California's Tribal Marine Stewardship goals, increase overall MPA network connectivity, add habitat replicates to the South Coast MPAs, and create a conservation corridor for coastal wildlife that spans from land to sea. Specifically, our lab's research has demonstrated that the proposed area is an important habitat for the North Pacific population of white sharks, and that juvenile white sharks have site loyalty to Carpinteria and specific habitat needs that are present in the Carpinteria waters (McCauley et al. 2024).

The Point Sal SMCA would protect important marine life and habitats, advance the state's goals toward Tribal co-stewardship of California's coastal waters, create an area where both land and sea are conserved, and support local and network-wide resilience to the impacts of climate change and growing ocean threats into the future. As California's coastal waters face the mounting pressures of increased warming and coastal development, a new MPA at Point Sal would protect habitats in the region that are less exposed to local stressors than the closest nearby MPAs (Vandenberg SMR and Point Buchon SMR/SMCA), strengthening the state's MPA network by adding a critical replicate site—an ecological safeguard or "insurance policy"—that enhances resilience and reduces risk across California's broader MPA system.

We thank you for your work to thoughtfully consider the adaptive management of California's MPA Network and appreciate your consideration of the evidence contained in this letter for strengthening the Network.

Sincerely,



Douglas McCauley, PhD
Professor, Ecology, Evolution and Marine Biology
Director, Benioff Ocean Science Laboratory
UC Santa Barbara

Molly Morse, MS
Senior Manager, Benioff Ocean Science Laboratory
UC Santa Barbara

The viewpoints expressed in the preceding letter represent our personal perspectives and do not represent the viewpoints of the UCSB Marine Science Institute, UC Santa Barbara, or the University of California system.

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From: BILL WOODBRIDGE <[redacted]>
Sent: Tuesday, April 21, 2026 03:12 PM
To: FGC <FGC@fgc.ca.gov>
Subject: Please support the Pt. Sal Marine Protected Area

This area is exceptionally rich ecologically and supports diverse ocean wildlife and habitats, including kelp beds, rocky reefs, tide pools, sandy beaches, a migratory whale corridor, a critical larval retention zone, and a seabird and sea lion rookery.

It is an ancestral Chumash territory. Designating this MPA would honor and strengthen Chumash stewardship of their ancestral waters, and elevate historical and present-day Chuash connections to the region.

I implore you add this MPA to help close the missing links to other MPAs.

Thank you!

Bill Woodbridge
Santa Barbara

Ventura County Commercial Fishermen's Association
1237 S. Victoria Ave #284
Oxnard, CA 93035
(805) 663-2152
venturacountyfishermen@gmail.com

21st April, 2026

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

Subject: **Opposition to Petition 2023-28MPA – Point Sal SMCA**

Dear California Fish and Game Commission,

My name is Dave Colker, and I serve as the Executive Director of the Ventura County Commercial Fishermen's Association (VCCFA). Through my role with VCCFA, I represent a growing network of commercial fishermen, industry partners, and stakeholders who are directly connected to and dependent upon access to California's coastal resources.

Our association has been actively engaged throughout the Marine Protected Area (MPA) petition process, carefully reviewing proposals, participating in meetings, and working to ensure that the voices of the commercial fishing community are heard and considered. We are committed to responsible ocean stewardship, sustainable fisheries, and collaborative management approaches that are grounded in sound science, practical application, and a full understanding of both ecological and socioeconomic impacts.

On behalf of the Ventura County Commercial Fishermen's Association (VCCFA), I respectfully submit comments regarding Petition 2023-28MPA proposing a new State Marine Conservation Area at Point Sal.

While we recognize the ecological value of the Point Sal region, our concerns center on the **lack of a comprehensive socioeconomic analysis** and the failure to evaluate **regional impacts—particularly effort displacement—across the Morro Bay to Los Angeles fishing corridor**.

The petition concludes that economic impacts would be minimal based on the relatively small percentage of reported landings within the affected fishing blocks . However, this conclusion does not reflect how fisheries operate in reality along the Central and Southern California coast.

Fishermen operating out of **Morro Bay, Santa Barbara, Ventura, Channel Islands Harbor, and Los Angeles/Long Beach** rely on access to a network of fishing grounds that shift seasonally, environmentally, and economically. Areas like Point Sal are not isolated—they are part of a broader working system that allows fishermen to distribute effort, manage risk, and maintain viable operations.

When access to one area is removed, fishing effort does not disappear—it is **redistributed**.

This petition does not adequately analyze what happens when that effort is displaced into surrounding open areas, including:

- Waters off **Point Conception and Santa Barbara Channel**
- Fishing grounds off **Ventura and the Northern Channel Islands**
- Already constrained areas accessible to fleets working out of **Los Angeles and Long Beach**

The result of this displacement is predictable and already observed in other regions:

- Increased competition in remaining open areas
- Crowding of productive fishing grounds
- Gear conflicts between fishermen
- Reduced catch efficiency and increased operating costs
- Greater pressure on fish stocks in open-access areas

These are not theoretical impacts—they are **direct socioeconomic consequences** that affect the viability of commercial fishing businesses and the communities that depend on them.

Additionally, the petition acknowledges that recreational fishing data was not available at the time of submission . This highlights that the socioeconomic analysis is incomplete. Recreational and commercial fisheries both contribute to pressure on open areas, and without a full accounting, the Commission is not being provided with a complete picture of cumulative impacts.

The economic analysis presented is also insufficient. By focusing narrowly on reported landings within the proposed footprint, the petition fails to account for:

- The economic role of **mobility and access** in fishing operations
- The dependence of fishermen on **alternative grounds when conditions change**
- The broader economic ripple effects on **processors, suppliers, fuel docks, and working waterfronts** from Morro Bay through Los Angeles

In short, the analysis does not capture the **regional economic system** that this closure would affect.

While the petition emphasizes ecological benefits within the proposed boundaries, it does not adequately consider the **trade-offs outside those boundaries**, where displaced fishing pressure will concentrate. This imbalance is a critical omission.

For these reasons, VCCFA urges the Commission to proceed with caution. At a minimum, we recommend:

1. A full regional socioeconomic analysis from **Morro Bay to Los Angeles**, including fleet behavior and mobility
2. A detailed evaluation of **effort displacement and its impacts on open areas**
3. Inclusion of **complete recreational fishing data** before any determination is made
4. A broader economic impact assessment that reflects the **true operational realities of California's commercial fisheries**

We appreciate the Commission's work in navigating these complex petitions and respectfully

request that these critical gaps be addressed to ensure balanced, informed decision-making.

Respectfully submitted,

Dave Colker
Executive Director
Ventura County Commercial Fishermen's Association (VCCFA)

April 22, 2026

Eric Sklar, President
California Fish and Game Commission
715 P Street, 16th Floor
Sacramento, CA 95814

Re: <u>Support for designating a new State Marine Conservation Area at Point Sal (Petition 2023-28MPA)</u>

Dear President Sklar and Honorable Commissioners:

The undersigned organizations write to express our strong support for designating a new Tribally co-managed State Marine Conservation Area (SMCA) protecting the waters around Point Sal. This designation would protect important marine life and habitats, advance the state's goals toward Tribal co-stewardship of California's coastal waters, create an area where both land and sea are conserved, and support local and network-wide resilience to the impacts of climate change and growing ocean threats into the future.

Point Sal is an ecologically rich headland along the Santa Barbara County coastline that supports a diversity of ocean life. Its waters contain kelp forests, tidepools, soft and hard bottom habitat, sandy beaches, and supports iconic marine mammals such as humpback whales, gray whales, sea otters, sea lions, and elephant seals. A small islet off the point called Lion Rock provides important habitat for seabird nesting, roosting, and foraging as well as an important marine mammal haul out area. Point Sal holds historical and cultural significance for Chumash people, who have inhabited this area and lived in close connection with its lands and waters for millennia. Historical villages called Atajes and Lopse were located nearby, and abundant evidence of Chumash inhabitance has been found on the point itself.

California's coastal waters are facing mounting pressures, such as warming waters, increasingly frequent marine heatwaves, and the potential expansion of industrial uses like offshore oil and gas drilling, offshore wind energy, coastal desalination, and aquaculture. The two nearest MPAs to the Point Sal proposal—Vandenberg State Marine Reserve (SMR), located 17 km to the south of this proposed area, and the Point Buchon SMR/SMCA complex, located 50 km to the north—are both sited near potential future offshore wind development projects, and may experience adverse impacts related to the development of industrialized renewable energy projects in the coming decade. In addition, the Point Buchon SMR/SMCA complex is located just north of the Diablo Canyon Power Plant, which still uses seawater for its once-through cooling process, estimated to kill roughly 1.5 billion marine organisms in early life stages each year. A new MPA at Point Sal would protect comparable habitats in the region that are less exposed to local stressors, strengthening the state's marine protected area (MPA) network by adding a critical replicate site—an ecological safeguard or "insurance policy"—that enhances resilience and reduces risk across California's broader MPA system.

In addition, Point Sal is a beloved wild space for local community members and visitors alike – many of whom hike the 11-mile round-trip trail to the point and its beaches to gaze upon panoramic vistas, experience land and sea in its natural state, and fish from its undeveloped shores. Safeguarding Point Sal's relatively undisturbed waters now will help bolster ocean health in the face of impacts, promoting ecological resilience into the future while still supporting important recreational, cultural, and subsistence uses.

The designation of a new MPA at this site could also bring additional educational, outreach, and research opportunities to local Tribal members and nearby disadvantaged communities of Guadalupe, Santa Maria, and Lompoc[1] via the state's MPA Management Program. Importantly, the MPA Management Program's activities are supported by funds generated by the Ocean Protection Council's Once-Through Cooling Interim Mitigation Program, which collects mitigation payments from California power plants not compliant with state standards—including the nearby Diablo Canyon plant.[2] A new SMCA at Point Sal would offer a powerful opportunity to reinvest mitigation funds into the local communities and marine ecosystems most affected by the ecological impacts of nearby coastal power plant operations.

[1] As defined by CA Senate Bill 535. OEHHA, "CalEnviroScreen 4.0," Text, CA.Gov, September 20, 2021, https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40; OEHHA, "Final Designation of Disadvantaged Communities Pursuant to Senate Bill 535" (CalEPA, May 2022).
[2] https://opc.ca.gov/once-through-cooling-interim-mitigation-program/

Finally, coastal marine ecosystems are influenced by both ocean- and land-based activities. This proposal presents a unique possibility for the state to advance a holistic, ridge-to-reef, seascape-level approach to conservation. The majority of the lands directly adjacent to the proposed SMCA are protected by Santa Barbara County, the Bureau of Land Management, and California State Parks, thanks to extensive, community-led, terrestrial conservation efforts that took place over the past two decades. If designated, this SMCA would be free of negative impacts from incompatible land-use changes and pollution from upstream sources. Protected waves would crash upon protected shores.

We deeply appreciate the Commission's continued efforts to promote and champion the conservation of California's precious marine resources. Accepting this petition will promote a thriving and healthy ocean, protect important marine habitat, enhance ecosystem-level resilience, and advance Tribal co-stewardship of California's coastal waters. We respectfully urge the Commission to pursue ambitious ocean conservation actions like this petition as this process moves forward. Thank you for your consideration.

Sincerely,

Azul

California Coastal Protection Network

California Environmental Voters

California Marine Sanctuary Foundation

California Native Plant Society Alta Peak Chapter

CleanEarth4Kids.org

Center for Biological Diversity

Defenders of Wildlife

Endangered Habitats League

Environment California Research and Policy Center

Environmental Center of San Diego

Environmental Defense Center

EPIC (Environmental Protection Information Center)

FishOn

Guadalupe Dunes Center

Heal the Ocean

Hispanic Access Foundation

Inland Ocean Coalition

Latino Outdoors

LIFT Economy

Marine Conservation Institute

Monterey Waterkeeper

Morongo Basin Conservation Association

National Ocean Protection Coalition

National Parks Conservation Association

Native Coast Action Network

Ocean Defense Initiative

Patagonia

Point Blue Conservation

Salted Roots

SBCAN

SeaChange Scientific Consulting, LLC

Sierra Club California

Sierra Club Santa Barbara-Ventura Chapter

Sierra Club Santa Lucia Chapter

The Ocean Project

The Wilderness Society

Tolowa Dee-ni' Nation Natural Resources Dept.

Tuleyome

Turtle Island Restoration Network

Western Watersheds Project

WILDCOAST

From: Rick Duenas <[redacted]>
Sent: Wednesday, April 22, 2026 09:56 AM
To: FGC <FGC@fgc.ca.gov>
Subject: Public comment: May 5-6, 2026: Central Region Petitions

Dear President Sklar and Members of the Commission,

My name is Rick Duenas and I am a recreational angler and diver in Northern California who often recreates on the central coast. I am writing regarding the MPA petitions for San Luis Obispo through Santa Barbara County including the Northern Channel Islands. I urge you to deny most of these petitions or encourage petitioners to carve out recreational access as noted below.

2023-28: **Deny**. The remoteness and aspect of this location serve as refuge as it is fishable only in calmer weather patterns already. Also, this location is already inside the Chumash Heritage National Marine Sanctuary and therefore already counted in 30x30. I would prefer that any new MPAs contribute to increasing the 30x30 percentage.

2023-29: **Deny or revise.** This area provides important near-shore access for divers and small-craft anglers. I would like to see spearfishing, spiny lobster, and boat-based hook-and-line finfish take allowance. From the Tribal Committee Meeting, it was not clear to me what cultural activities would be supported by this MPA that are not already allowed. I recognize the importance of protecting submerged ancestral sites, so I would prefer that restrictions be tailored to barring the use of destructive bottom gear or anchoring instead of restricting lower impact gear types.

2023-19: **Accept with revision**. I appreciate that the petitioner allowed for the take of finfish as the location is one of the better areas for salmon and halibut trolling in the region. However, this area is also important to the commercial sector, particularly for market squid, so I would like to see commercial access with low impact gear preserved as well.

2023-20: **Accept** as clarified in Tribal Committee Meeting. I appreciate the petitioner not changing general public fishing access to salmon and albacore while allowing for tribal take and co-management.

2023-34: **Deny**. I support CDFW's recommendation. I appreciate allowance for low impact pelagic take wherever possible.

2023-33: **Deny.** I support CDFW's recommendation. The proposed actions would severely limit in-shore recreation access.

2023-18: **Deny**. I support CDFW's recommendation. I appreciate opportunities for more access but I am okay with the status quo and do not wish to trade access elsewhere in the network in order to balance this change.

2023-27: **Deny**. I dive Anacapa every fall and the amended 0-30m proposal seemed like one of the more reasonable and targeted petitions but I support CDFW's recommendation.

2023-14: **Deny**. I support CDFW's recommendation. I believe that these reserves should serve as control treatment groups relative to urchin barren mitigation being done outside of reserves.

2023-15: **Deny**. I support CDFW's recommendation. I appreciate opportunities for more access but I am okay with the status quo and do not wish to trade access elsewhere in the network in order to balance this change.

In short, please consider denying or requesting revision to the vast majority of the central region bin-2 petitions. Thank you for your time.

Sincerely,

Rick Duenas

State of California – Fish and Game Commission
PETITION TO THE CALIFORNIA FISH AND GAME COMMISSION FOR REGULATION CHANGE
FGC 1 (Rev 06/19) Page 1 of 3

Tracking Number: (_____)

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: Lisa Suatoni
Address: Natural Resources Defense Council, [redacted]
Telephone number: [redacted]
Email address: [redacted]
Co-sponsors: Sam Cohen - Santa Ynez Band of Chumash Indians, Azsha Hudson - Environmental Defense Center

2. Rulemaking Authority (Required) - Reference to the statutory or constitutional authority of the Commission to take the action requested:

Authority cited: Sections 200, 205(c), 265, 399, 1590, 1591, 2860, 2861 and 6750, Fish and Game Code; and Sections 36725(a) and 36725(e), Public Resources Code.

3. Overview (Required):

The attached document describes a proposal for an additional California-Chumash co-management SMCA in the Ssouth Cecoast region to be named Mishopshno, afterfollowing the ancestral Chumash village located in the area to honor the cultural heritage of the Chumash people and their continued relationship to their ancestral lands and waters. The Mishopshnoproposed SMCAMPA would prohibit the injury, damage, take, or possession of all living, geological, or cultural marine resources with the exception of Tribal take using hand based equipment by the Santa Ynez Band of Chumash Indians, and following exceptions: recreational take of finfishfishing from shore using hook and line. These permitted activities would; and allow for enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the public including, federally recognized tribe of the the Santa Ynez Band of Chumash Indians (SYBCI) , and for who will work to extend access to other non-federally recognized Chumash people.

The proposed area aligns with state MPA Master Plan design and feasibility guidelines provided by CDFW, and is bounded by the mean high tide line, the tip of Salt Pointthe 3-nm state waters boundary,

and straight lines connecting the following points in the order listed:

1. SE: 119.53589W long. 34.366106N lat.
2. NE: 119.53589W long. 34.395977N lat.
3. NW: 119.587711W long. 34.416944N lat.
4. SW: 119.587711W long. 34.366106N lat.

4. Rationale (Required) - Describe the problem and the reason for the proposed change:

The intent of the SMCA is to 1) help meet the Master Plan's size and spacing guidelines for spacing between protected habitats, promoting connectivity in the network and representation of habitat types, 2) protect habitat attractive to marine wildlife, such as juvenile white sharks, and 3) honor the nearby historical Mishopshno village and cultural heritage of the Chumash in the area and restore management to the SYBCI of this portion of coastal waters. This petition calls for a co-management agreement between the State of California and the SYBCI through continued access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for all Chumash people. ~~allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians, who will work to extend access to other non-federally recognized Chumash people. See attached documentation for further details.~~

SECTION II: Optional Information

5. Date of Petition: 11/30/2023

6. Category of Proposed Change

- ☐ Sport Fishing
- ☐ Commercial Fishing
- ☐ Hunting
- ✖☐ Other, please specify: MPAs, Section 632

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): Westlaw Regulations
- ☐ 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

- ✖☐ 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: At the discretion of the Commission.

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

a. Proposed Mishopshno SMCA petition narrative (updated as of 3/26/2025)

b. Appendix A – Expanded synthesis of juvenile white shark aggregation at proposed Mishopshno SMCA
c. Appendix B – Proposed Mishopshno SMCA letter of support

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:

Some commercial fishing and fishing by commercial passenger fishing vessels (CPFVs) occurs in this area. The proposed Mishopshno SMCA is located in California fishing block number 652, which provides a very small proportion of landings for the Santa Barbara Port Area by weight and value (see petition narrative for more detailed data). The proposed SMCA would close 18% of this fishing block to fishing. Furthermore, the regulations and boundaries for the SMCA have been amended following extensive outreach and discussions with local Tribes and fishers, in order to limit direct, near-term impacts to extractive activities to the greatest extent possible while still adhering to the MLPA's science-based size criteria and guidance around high levels of protection (see petition narrative for more detail). Considering the relatively low proportion of landings and value coming from this fishing block, the small size of the proposed SMCA within the fishing block, and the amended boundaries that allow continued access to a locally important fishing areas, we anticipate that establishing this SMCA would have limited impact on commercial fishing vessels and CPFVs in the area.

Further, previous designations of local MPAs have resulted in benefits for the commercial CA spiny lobster fishery.

~~Unknown. However, t~~This ~~region is a popular fishing spot for spiny lobster in particular and preventing take in the region may not be welcomed by recreational fishers in the area. Yet, research has shown an increase in lobster populations within local MPAs and a resulting increase in lobster catch in neighboring zones.~~ Recent work found that a 35% reduction in fishing area was compensated for by a 225% increase in total catch after 6 ~~-~~years, demonstrating local scale trade-offs provided benefits to fisheries. The designation of this MPA is likely to have a similarly positive impact on this fishery in the medium- to long-term.

Finally, enhanced ocean protections can also benefit our economy, as millions of visitors travel to California's iconic coastline each year to recreate and enjoy a healthy ocean, supporting our state's blue economy. This area holds special importance for visitors and residents alike engaging in ocean and coastal recreation, as well as for local Chumash people engaging in cultural and subsistence practices and for recreational fishers. The proposed SMCA would support these activities, allowing public access and all non-consumptive activities, allowing fishing from shore using hook-and-line, and granting a Tribal take exemption for the federally recognized Santa Ynez Band of Chumash Indians to fish with the use of traditional hand-based equipment. While there are concerns among recreational and commercial fishers about the fiscal impacts of the proposed SMCA, many businesses assert that the creation of the Mishopshno SMCA would bolster their business through indirect tourism and recreation impacts. By making the ocean healthier and more resilient to climate change, marine protections help safeguard everyone's ability to enjoy these areas through a variety of recreational activities, far into the future.

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: **3/26/2025**

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

March 26, 2025

Erika Zavaleta, President
California Fish and Game Commission
715 P Street, 16th Floor
Sacramento, CA 95817

Submitted electronically to fgc@fgc.ca.gov

RE: Amendments to Petition 2023-29MPA: Mishopshno State Marine Conservation Area

Dear President Zavaleta and Honorable Commissioners:

In 2023, the Santa Ynez Band of Chumash Indians (SYBCI), Environmental Defense Center (EDC), and Natural Resources Defense Council (NRDC) submitted petition 2023-29MPA to the Fish and Game Commission (FGC) proposing a California-Chumash co-managed marine protected area (MPA) off the coast of Carpinteria, to be named Mishopshno State Marine Conservation Area (SMCA) after the ancestral Chumash village located in the area.

Given the significance of the area to the Chumash people and the important scientific research and monitoring being conducted within the proposed boundary, the original petition proposed the following suggested regulations:

> *Take of all living, geological, or cultural marine resources is prohibited except:*
> *1. The following federally recognized tribe is exempt from the area and take regulations found in subsection 632(b)(9) of these regulations and shall comply with all other existing regulations and statutes: The federally recognized tribe of the Santa Ynez Band of Chumash Indians. Within the proposed SMCA, the Chumash would be allowed to fish with the use of hand-based equipment. The proposed exemptions would be consistent with allowing tribal take exemptions as currently defined in Title 14, §632(a)(11), which identify how a member of a federally recognized tribe may be authorized to take living marine resources from an MPA with site-specific take restrictions. Members taking living marine resources under this provision are subject to current seasonal, bag, possession, gear and size limits in existing Fish and Game Code statutes and regulations of the Commission, except otherwise provided for in Title 14, §632(b).*
> *2. Scientific research pursuant to the MLPA regulations for SMCAs. (14 C.F.R. section 632(a)(1)(C).*

Since January 2024, our Tribal Nation and our two organizations have conducted over 100 in-person, video and phone meetings with community members and interested parties to discuss the Mishopshno SMCA proposal. These conversations have improved our understanding of the Carpinteria area, highlighted community support for protecting the coastal waters, and shaped our supplemental site-specific research. Our discussions with local Tribes, Tribal organizations, and fishers in particular have informed our decision to amend the original petition submitted to the FGC.

We developed the amendments to Petition 2023-29MPA to ensure non-federally recognized Tribes retain shore fishing access, and to limit direct, near-term impacts to extractive activities to the greatest extent possible, while still adhering to the Master Plan science-based design criteria and guidance around high levels of protection. Our amended proposed regulations are:

- Allow for the recreational take of finfish from shore using hook-and-line, promoting access to certain important marine and cultural resources for all Chumash people – including non-federally recognized Tribes;
- Allow for recreational take of finfish from shore using hook-and-line for the public;
- Reduce the SMCA in size to 9 square miles, with boundaries that leave Armpit Reef, the easternmost edge of Carpinteria Reef, and the eastern portion of the kelp forest associated with Carpinteria Reef outside of the MPA's boundaries, to allow for continued recreational and commercial fishing access to certain important local fishing grounds.

These amendments are supplemental to the amendment submitted on February 9, 2024, which excluded the Carpinteria Salt Marsh Reserve from the proposed Mishopshno SMCA boundaries given its existing protection and management under the UC Natural Reserve System.

We hope these amendments, which are informed by the additional insight and information gathered through our outreach efforts with local communities and interested parties, encourage the Commission to approve the Mishopshno SMCA.

Thank you for your consideration.

Sincerely,

Sam Cohen
Government Affairs and Legal Officer
Santa Ynez Band of Chumash Indians

Azsha Hudson
Marine Conservation Analyst & Program Manager
Environmental Defense Center

Sandy Aylesworth
Director, Pacific Initiative, Nature
Natural Resources Defense Council

Overview

The intent of this marine protected area (MPA) is to 1) help meet the Master Plan design guidelines for spacing between protected habitats, promoting connectivity in the network and representation of habitat types, 2) protect habitat important to marine wildlife, such as juvenile white sharks (JWS), and 3) restore management to the Santa Ynez Band of Chumash Indians (SYBCI) of this portion of coastal waters. This petition calls for a co-management agreement between the State of California and the SYBCI and continued access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for all Chumash people.

We propose a new SMCA named Mishopshno for a prominent Chumash coastal village that was proximate to the marine area to be protected. Mishopshno village was an important coastal site in the ancestral lands of the diverse Chumash people because of its use for boatbuilding and its close proximity to the ocean. It was described by members of the Portolá expedition who encountered the town on August 17, 1769 as "...at the very edge of the sea a large village or very regular town here at this point, appearing at a distance as though it were a shipyard, because at the moment they were building a canoe that still had its topmost plank lacking from it (dubbed by soldiers La Carpinteria, the Carpenter Shop)."[1] The canoes described here were tomol, Chumash watercraft built using sophisticated techniques for production of wooden planks and waterproofing with specialized local clay.[2] Chumash tomol paddlers still use the area to practice for their annual crossing to Limuw, also known as Santa Cruz Island.

Designation of a new Tribal MPA supports California and Biden era federal initiatives to enhance tribal co-management.[3] The Mishopshno SMCA would provide an additional Tribal co-management MPA for the South Coast and is an example of two of the four coastal 30x30 "key strategies:" 1) adaptive management of the MPAs network, and 2) advancing Tribally led conservation.[4] Further, it would help advance Recommendation 2 of the CDFW DMR Report, "Create a Pathway to Tribal Co-Management."[5] *This petition is co-sponsored by the federally recognized Santa Ynez Band of Chumash Indians, the Natural Resources Defense Council, and Environmental Defense Center.*

Rationale

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[1] Lynn H. Gamble, "Historic Chumash Settlements on the Mainland Coast," in *The Chumash World at European Contact: Power, Trade, and Feasting Among Complex Hunter-Gatherers* (University of California Press, 2011).
[2] John Peabody Harrington et al., *TOMOL: Chumash Watercraft as Described in the Ethnographic Notes of John P. Harrington*, Ballena Press Anthropological Papers ; No. 9 (Socorro, N.M.: Ballena Press, 1978).
[3] California Department of Fish and Wildlife, *California's Marine Protected Area Network Decadal Management Review,* 2022, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=209209&&inline.; State of California, *Pathways to 30x30: Accelerating Conservation of California's Nature,* April 2022, https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/30-by-30/Final_Pathwaysto30x30_042022_508.pdf; AB-1284 Tribal ancestral lands and waters: cogovernance and comanagement agreements. (2023-2024) https://leginfo.legislature.ca.gov/faces/billStatusClient.xhtml?bill_id=202320240AB1284; U.S. Secretary Of Agriculture, Secretary Of Interior, and Secretary Of Commerce, "Joint Secretarial Order on Fulfilling the Trust Responsibility to Indian Tribes in the Stewardship of Federal Lands and Waters," 2021, https://www.doi.gov/sites/doi.gov/files/elips/documents/joint-so-3403-a1_0.pdf.
[4] Wishtoyo Foundation, *Tribal Marine Protected Areas: Protecting Maritime Ways and Practice,* 2004, https://static1.squarespace.com/static/5459dd35e4b0eb18b9b5599b/t/56bb76be859fd0422da8978d/1455126215937/TribalMPAsWhitePaper.pdf

[5] CDFW, *California's Marine Protected Area Network Decadal Management Review,* 2022

1. Habitat, Spacing, & Connectivity

The MPA Network was designed to function as an ecological network to ensure the protection of California's diverse coastal ecosystems.[6] During the design and planning phase, a science advisory team (SAT) identified the key metrics needed to achieve network connectivity, including MPA size, spacing, and key habitat representation and replication.[7] Currently, mainland coastal MPAs in the Santa Barbara region, Campus Point and Point Dume, are approximately 74 miles apart, 12 miles further than the recommended maximum MPA spacing distance of 62 miles to ensure ecological connectivity (Figure 1).[8] This proposal aims to address that gap by adding a protected area around what is now called Carpinteria, CA (the ancestral home of the SYBCI).

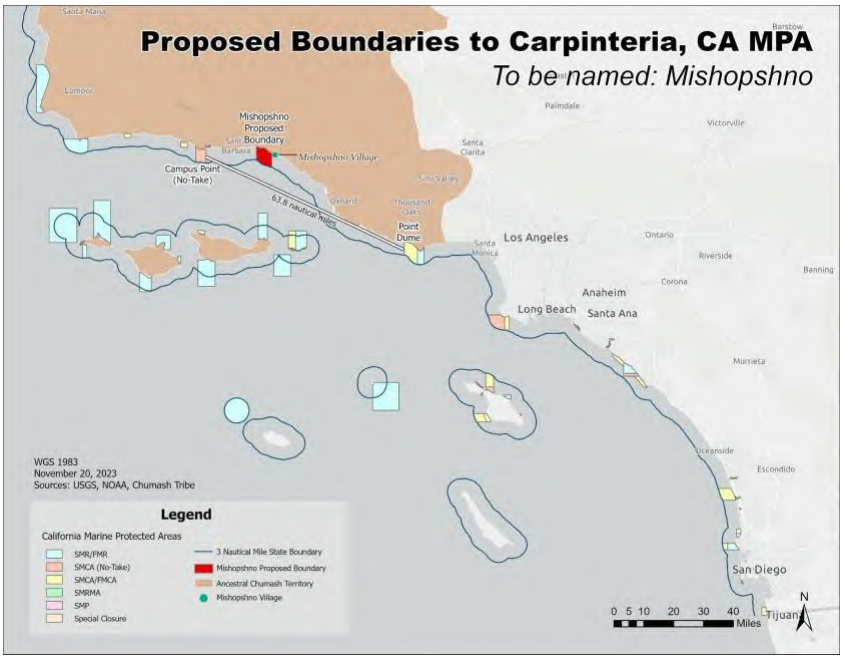

Figure 1: Map of southern California MPAs with the proposed SMCA near Carpinteria shown in red. The 64 nm distance between two existing MPAs at Campus Point and Point Dume is indicated. This distance is greater than the maximum suggested spacing to ensure ecological connectivity. Mishopshno was one of the many Chumash villages in the region at the time of European colonization.

Carpinteria, initially proposed to be the site for an MPA in the original planning stages for the network, lies on the mainland coast north of the Channel Islands.[9] Within a relatively small area, a diversity of habitat types exist including rocky reef, rocky intertidal, sandy habitats, sandy beaches, kelp forests, and surfgrass beds. Associated with these habitat features are higher trophic level species including halibut, lobster, nearshore sharks and rays, and multiple harbor seal haulouts. Research shows that MPAs with a diversity of habitat types and depths facilitate increased connectivity among habitats.[10]

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[6] CDFW, *California's Marine Protected Area Network Decadal Management Review,* 2022

[7] California Department of Fish and Wildlife, *Master Plan for Marine Protected Areas,* 2016 https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=112487&inline.; Saarman, Emily, et al., 2013. "The Role of Science in Supporting Marine Protected Area Network Planning and Design in California." Ocean & Coastal Management, Special Issue on California's Marine Protected Area Network Planning Process, 74 (March):45–56. https://doi.org/10.1016/j.ocecoaman.2012.08.021.

[8] CDFW *Master Plan for Marine Protected Areas* 2016, Appendix A, page A-35.

[9] California MLPA South Coast Study Region, Description of Marine Protected Areas (MPAs) in Revised External MPA Proposal C (Round 2) Created May 14, 2009.

[10] Carr, Mark H., et al., 2017. "The Central Importance of Ecological Spatial Connectivity to Effective Coastal Marine Protected Areas and to Meeting the Challenges of Climate Change in the Marine Environment." Aquatic Conservation: Marine and Freshwater Ecosystems 27 (S1): 6–29. https://doi.org/10.1002/aqc.2800; Hopkins, Charlotte R., et al., 2020. "Evaluating Whether MPA Management Measures Meet Ecological Principles for Effective Biodiversity Protection." Acta Oecologica 108 (October):103625. https://doi.org/10.1016/j.actao.2020.103625.

The proposed SMCA would protect the marine waters adjacent to Carpinteria Salt Marsh Reserve, which protects a critically important Southern California estuary. The marsh lies adjacent to a sandy beach, subtidal rocky reef, and kelp beds, enabling the exchange of nutrients. The marsh also provides a regional nursery for halibut and other marine and estuarine fish, which supports a productive nearshore marine ecosystem.[11] Carpinteria Reef, part of which would be within the SMCA's boundaries, is a large rocky reef with kelp beds. The reef supports one of the more abundant marine life communities and persistent kelp beds in Santa Barbara County.[12] The proposed SMCA encompasses 90% of local biodiversity and counts as a "replicate," as determined from biological surveys, for the following habitat types: kelp forest (2.2 mile length), beaches (3.6 mile length), and nearshore (0-30m) soft bottom substrate (3.2 mile length).[13] The proposed SMCA also contains the following habitat types: hardened shores (1.7 mile length), tidal flats (0.1 mile length), nearshore hard-bottomed substrate (0.34 square mile area and 0.2 mile length at 0-30m depth), deeper hard-bottomed substrate (0.02 square mile area at 30-100m depth), and deeper soft-bottom substrate (2.94 square mile area at 30-100m depth).[14] Furthermore, the South Coast MLPA Planning region protects a lower proportion of nearshore hard-bottomed habitat than other regions.[15] Incorporation of the Mishopshno SMCA would increase the representation of these habitat types for the region.

Ecological connectivity modeling has advanced since the initial network design process. Recent studies have confirmed that the system is generally functioning as an effective network, and that MPAs are well-connected both demographically and environmentally.[16] In addition, modeling results suggest that the positive effect of MPAs on the size and abundance of species within their boundaries also enhances their contribution to larval connectivity outside their boundaries.[17] The proposed Mishopshno SMCA may further this beneficial contribution, by providing an additional MPA in the network with increased larval and reproductive output.

In the coming decades, ocean temperature thresholds will be exceeded more often because of the combination of marine heatwaves and long-term warming.[18] The inclusion of a diversity of upwelling regimes and habitat types in California's MPA network, such as those in the mainland and Channel Island MPAs, is thought to offer additional insurance against changing conditions.[19] As a general matter, ensuring proper spacing, placement, and consequently connectivity of southern mainland MPAs is increasingly important in light of climate change.[20]

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[11] University of California Natural Reserve System, "Carpinteria Salt Marsh," accessed September 2023, https://ucnrs.org/reserves/carpinteria-salt-marsh-reserve/.
[12] Levenbach, Stuart. 2008. "Community-Wide Ramifications of an Associational Refuge on Shallow Rocky Reefs." Ecology 89 (10): 2819–28. https://doi.org/10.1890/07-0656.1.
[13] SeaSketch, "California MPA Petitions," https://www.seasketch.org/california/app. Accessed March 11, 2025.
[14] SeaSketch, "California MPA Petitions," https://www.seasketch.org/california/app. Accessed March 11, 2025.
[15] Jennifer E. Caselle, et al., "A Synthesis of Ecological and Social Outcomes from the California Marine Protected Area (MPA) Network", 2023, https://opc.ca.gov/wp-content/uploads/2023/01/NCEAS_MPA_Report_Final.pdf.
[16] CDFW Decadal Management Review 2022; Yeager ME, et al., *Assessing connectivity across the California Marine Protected Area Network*, 2023, https://opc.ca.gov/wp-content/uploads/2024/10/MPA-Connectivity-Final-Report-508.pdf.
[17] Yeager et al. 2023.
[18] Frölicher, Thomas L., Erich M. Fischer, and Nicolas Gruber. 2018. "Marine Heatwaves under Global Warming." Nature 560 (7718): 360–64. https://doi.org/10.1038/s41586-018-0383-9; Laufkötter, Charlotte, Jakob Zscheischler, and Thomas L. Frölicher. 2020. "High-Impact Marine Heatwaves Attributable to Human-Induced Global Warming." Science 369 (6511): 1621–25. https://doi.org/10.1126/science.aba0690.
[19] Shelby L. Ziegler et al. 2023, "Marine Protected Areas, Marine Heatwaves, and the Resilience of Nearshore Fish Communities," *Scientific Reports* 13, no. 1 (January 25, 2023): 1405, https://doi.org/10.1038/s41598-023-28507-1.
[20] Carr et al. 2017

2. Habitat attractive to White Sharks (see Appendix A for further detail)

The habitat distribution for the northeast Pacific population of white sharks is broad, spanning from Baja California to a point northwest in the Bering Sea off the Aleutian Islands.[21] However, research suggests that juveniles of this population are utilizing a narrower band of coastal waters for nursery habitat, stretching from the Southern California Bight to Baja.[22] Spatial data of white shark movements show that in areas off Carpinteria, JWS form aggregations for periods of weeks to months.[23] These spatial patterns suggest that this habitat attracts JWS, and that the area serves as an important white shark nursery.

White sharks are listed under Appendix II of the Convention on International Trade of Endangered Species of Wild Fauna and Flora (CITES).[24] The species is slow to reach reproductive maturity and produces only a small number of young each year, making it vulnerable to human stressors.[25] Research conducted in the Southern California Bight has found that fisheries bycatch is likely the main source of mortality for JWS.[26] Another factor threatening white sharks is a warming climate and ocean that has led to many species' historic distribution changing.

Juvenile white sharks inhabit a narrow habitat range, choosing shallow habitats (< 1000 m deep) close to land (< 30 km of the shoreline) in waters ranging from 14 to 24°C.[27] They can form aggregations at these ideal locations and display a high degree of residency.[28] Historically, Southern California was a suitable habitat eight months of the year, while coastal habitats in Baja California were suitable year-round.[29] Recent research shows that the average observed white shark density in Carpinteria increased significantly across three years beginning in 2019.[30] Utilizing detection data, a study found a JWS hot spot at Padaro Beach in Carpinteria in the months from May to December in 2020.[31] In this study, the tagged individuals were observed across a stretch of coastline from Loon Point south to Carpinteria State Beach.[32] Padaro Beach was classified as an ideal JWS aggregation spot due to its sandy beach with a rocky reef adjacent to an estuary inlet and low wave energy compared to many of the other nursery habitats available.[33] Although it was previously believed that JWS do not show site fidelity, there is growing evidence that the Southern California Bight is a region of primary nursery habitat,

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[21] Office of National Marine Sanctuary, "White Shark Conservation, White Shark Stewardship Project," Government Website, Greater Farallones National Marine Sanctuary, accessed November 17, 2023, https://farallones.noaa.gov/eco/sharks/sharks_conservation.html.
[22] Anderson, James M., et al., 2021. "Interannual Nearshore Habitat Use of Young of the Year White Sharks Off Southern California." Frontiers in Marine Science 8 (March). https://doi.org/10.3389/fmars.2021.645142.
[23] Anderson et al. 2021; Spurgeon, Emily, et al., 2022. "Quantifying Thermal Cues That Initiate Mass Emigrations in Juvenile White Sharks." Scientific Reports 12 (1): 19874. https://doi.org/10.1038/s41598-022-24377-1.
[24] Office of National Marine Sanctuary 2023.
[25] Ibid.
[26] Benson, John F., et al., 2018. "Juvenile Survival, Competing Risks, and Spatial Variation in Mortality Risk of a Marine Apex Predator." Journal of Applied Ecology 55 (6): 2888–97. https://doi.org/10.1111/1365-2664.13158.
[27] White, Connor F. et al., 2019. "Quantifying Habitat Selection and Variability in Habitat Suitability for Juvenile White Sharks." PLOS ONE 14 (5): e0214642. https://doi.org/10.1371/journal.pone.0214642.
[28] Lyons, Kady, et al., 2013. "The Degree and Result of Gillnet Fishery Interactions with Juvenile White Sharks in Southern California Assessed by Fishery-Independent and -Dependent Methods." Fisheries Research 147 (October):370–80. https://doi.org/10.1016/j.fishres.2013.07.009.
[29] Ibid.
[30] John K. Parsons, "Using Unoccupied Aerial Vehicles to Uncover Patterns of Density, Size Structure, and Distribution of White Sharks (Carcharodon Carcharias) at a Southern California Coastal Aggregation Site" (UC Santa Barbara, 2022), https://escholarship.org/uc/item/2f74m5fz.
[31] Spurgeon et al. 2022.
[32] Ibid.
[33] Ibid.

with specific “hotspots” like Carpinteria attracting fairly stable aggregations, and that the suitability of the habitat has been increasing relative to areas further south as a result of climate change.

3. The Importance of Tribally led Marine Stewardship and Tribal Co-Management

The Marine Life Protection Act (MLPA) did not direct how state agencies were to engage or consult with Tribes during the establishment process of California’s MPA network, and does not acknowledge coastal Indigenous peoples’ long-standing relationships to, dependence on, and stewardship of marine resources.[34] During the MLPA implementation process, there were opportunities for Tribes to engage in stakeholder groups through the Blue Ribbon Task Force and regional stakeholder process. However, Tribes are sovereign nations and require government-to-government consultation. These factors resulted in California Tribes’ initial opposition to the creation of the MPA network – many Tribes were fearful the MLPA could restrict Indigenous cultures and ways of life.

By the time the MLPA planning process came to the fourth and final coastal region, the North Coast, Tribes in the North were raising concerns about the lack of an official consultation with Tribal Nations on MPA designations in their ancestral waters. This resulted in state agencies implementing a consultation process that included Tribes as sovereigns and creating the exemption of “Tribal take,” to ensure that Tribes would retain access to their cultural and subsistence resources.[35] In the years following the MPA network’s implementation, Tribes, state agencies, and policymakers have made extensive progress to encourage and facilitate Tribal marine co-management and access in MPAs.[36]

Now, as California is conducting its first-ever adaptive management process, there is an opportunity to more thoroughly include the groups that were underrepresented during the initial implementation of the network, both Tribal and non-Tribal entities. This petition and Petition 2023-19MPA for the Chitqawi SMCA are the first Tribally proposed state MPAs in California. Designating this MPA would strengthen the role and authority of California Tribes in the state’s ocean and marine life protection efforts. With co-management, the Mishopshno MPA would also contribute to the integration of Tribes in California’s marine monitoring and management initiatives. Furthermore, this proposal aligns with the state’s goal of supporting Tribally led conservation.[37]

Socioeconomic Considerations

This area holds special importance for residents and visitors engaging in ocean and coastal recreation, for local Chumash people engaging in cultural and subsistence practices, and for commercial and recreational fishers.

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[34] Curtis G. Berkey & Scott W. Williams, 2019, “California Indian Tribes and the Marine Life Protection Act: The Seeds of a Partnership to Preserve Natural Resources,” 43 AM. INDIAN L. REV. 307, https://digitalcommons.law.ou.edu/ailr/vol43/iss2/2; California Marine Life Protection Act. https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=FGC&division=3.&title=&part=&chapter=10.5.&article=

[35] Berkey and Williams 2019

[36] McGinnis 2022

[37] *“30x30: Conserving 30% of California’s Coastal Waters by 2030 - California Ocean Protection Council.”* California Ocean Protection Council, 7 Jan. 2025, opc.ca.gov/30x30/.

Carpinteria is a popular area for surfers, swimmers, kayakers, birdwatchers, beach walkers, freedivers, shore fishers, and more. For instance, there are multiple surf schools in the area, and vessels cluster along the shore during the summer to observe JWS.[38] By making the ocean healthier and more resilient to climate change, strong marine protections help safeguard everyone's ability to enjoy these areas through a variety of recreational activities, far into the future. Enhanced ocean protections can also benefit our economy, as millions of visitors travel to California's iconic coastline each year to recreate and enjoy a healthy ocean, supporting our state's blue economy. In 2023, ocean tourism brought just over $2 billion in travel-related spending to Santa Barbara County and supported more than 20,000 jobs.[39]

One of the primary goals of this SMCA is to honor the Chumash people's cultural heritage and continued relationship with their ancestral lands and waters. Many culturally significant species for the Chumash are found in Carpinteria and the area proposed for protection, including but not limited to: sheep and kelp crab, Giant keyhole limpet, California mussel, Pacific sand dollar, several octopus species, wavy turban snail, California cone snail, harbor seal, leopard shark, brown pelican, Heerman's gull, Brandt's cormorant, double-crested cormorant, and more.[40] As mentioned previously, Chumash tomol paddlers use the beaches and waters of the Carpinteria area to practice for their annual crossing to Limuw, also known as Santa Cruz Island. Local Chumash people also fish from shore for cultural, recreational, and subsistence purposes, typically using hook-and-line gear.

This is a popular area for recreational fishing as well. The sandy shores of Santa Claus and Padaro Beaches are known as particularly desirable surf fishing locations. Carpinteria Reef and its associated kelp forest provide critical habitat for many marine species, including several targeted by recreational fishers.[41] The nearby sandy beaches provide a safe entry point for people entering the water in California's often challenging coastal ocean conditions (e.g. large surf or swell), making this area a popular spearfishing and freediving location. Spearfishing can have a substantial negative effect on populations of marine fishes with small home ranges due to the targeted selection of larger individuals, which have the highest reproductive output. Some popular spearfishing and freediving targets, such as California sheephead, many species of rockfish, kelp bass (also known as calico bass), and California spiny lobster, have small home ranges and have been shown to benefit from the protections of California MPAs.[42]

Commercial fishing and fishing by commercial passenger fishing vessels (CPFVs) also occurs in this area. The proposed Mishopshno SMCA makes up 18% of California fishing block number 652. According to publicly available data accessed via the Marine Fisheries Data Explorer (MFDE), commercial fishing in this block represents an extremely small proportion of landings for the Santa Barbara Port Area, both by weight and value. In 2023, landings from fishing block 652 represented 0.22% of total landings by weight, and 1.1% of total landings by value, reported

[38] Personal communications to local businesses and residents, February – March 2025.
[39] Visit California, 2024. The Economic Impact of Travel in California. https://industry.visitcalifornia.com/research/economic-impact.
[40] Wishtoyo Foundation 2004; Santa Barbara Coastal LTER Data Catalog, https://sbclter.msi.ucsb.edu/data/catalog/, accessed September 2023.
[41] While our request to CDFW for recreational lobster fishing data from this area was being processed at time of submission, several conversations with local fishers confirm that Carpinteria Reef is a popular area for recreational lobster fishing by hand.
[42] California MPA Long Term Monitoring Program Final Reports: 1) Carr et al. 2021, Monitoring and Evaluation of Kelp Forest Ecosystems in the MLPA Marine Protected Area Network, https://caseagrant.ucsd.edu/system/files/2022-06/Kelp%20Forest%20Technical%20Report%20Narrative_v2.pdf 2) Hamilton et al. California Collaborative Fisheries Research Program (CCFRP) – Monitoring and Evaluation of California Marine Protected Areas. https://caseagrant.ucsd.edu/sites/default/files/CCFRP_Final_Report.pdf.

for the Santa Barbara Port Area from Southern California waters.[43] Over the previous ten-year period from 2013-2023, fisheries landings from fishing block 652 represented 0.16% of total landings by weight, and 0.63% of total landings by value, reported for the Santa Barbara Port Area from Southern California waters.

The MDFE data shows fishing block 652 represents a very small percentage of landings for halibut and California spiny lobster as well, which are both important commercial fisheries in the area. In 2023, halibut landings from block 652 represented 0.5% of total halibut landings by weight, and 0.6% of total halibut landings by value for the Santa Barbara Port Area. [44] Over the previous ten-year period from 2013-2023, halibut landings from this block represented 4.3% of total halibut landings by weight, and 3.9% of total halibut landings by value for the Santa Barbara Port Area. In 2023, California spiny lobster landings from block 652 represented 2.2% of total lobster landings by weight, and 2.2% of total lobster landings by value for the Santa Barbara Port Area. Over the previous ten-year period from 2013-2023, California spiny lobster landings from this block represented 2% of total lobster landings by weight, and 1.9% of total lobster landings by value for the Santa Barbara Port Area from Southern California waters.

Considering the above data and the size of the proposed Mishopshno SMCA, which makes up 18% of fishing block 652, we anticipate that closing this area to commercial fishing would have limited impact on overall commercial fisheries landings for the Santa Barbara Port Area. Overall, regional and statewide fishery landings and values were not negatively impacted by California's MPAs.[45] The commercial California spiny lobster fishery in the Santa Barbara region has seen significant benefits from MPAs – commercial landings more than doubled in the six years after local MPAs were established, with fishermen able to "fish the line" to intercept mature lobster leaving the MPAs.[46] A 35% reduction in fishing area resulted in a 225% increase in total catch, "indicating at a local scale that the trade-off of fishing ground for no-fishing zones benefitted the fishery."[47]

However, we are sensitive to the fact that the proposed MPA would limit some fishing access in the Carpinteria area and understand that these data above do not necessarily mean an MPA designation would not have an impact on individual fishers and businesses. In 2023, the latest year with data available, a total of 15 fishers, 19 businesses, and 16 vessels reported landings from fishing block 652. With this in mind, discussions with local fishers and fishing representatives have helped to further characterize the nature and spatial distribution of fishing in the area proposed for protection. We have amended the proposed SMCA's size and boundaries to exclude some of the preferred fishing areas and reduced the proposal as much as the Master Plan's scientifically informed size guidelines allow (see "Boundary Description" below).[48]

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[43] Southern California waters defined as all fishing blocks from Point Conception to the US-Mexico border (blocks 652-2035): https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=227793&inline.

[44] Including California halibut, Pacific halibut, and "Unspecified halibut" as reported in the MFDE

[45] Murray, Samantha, and Tyler T. Hee. 2019. "A Rising Tide: California's Ongoing Commitment to Monitoring, Managing and Enforcing Its Marine Protected Areas." Ocean & Coastal Management 182 (December):104920. https://doi.org/10.1016/j.ocecoaman.2019.104920.

[46] Lenihan, Hunter S., et al., 2021. "Evidence That Spillover from Marine Protected Areas Benefits the Spiny Lobster (Panulirus Interruptus) Fishery in Southern California." Scientific Reports 11 (1): 2663. https://doi.org/10.1038/s41598-021-82371-5.

[47] Lenihan et al. 2021

[48] CDFW Master Plan for Marine Protected Areas 2016, Appendix A, page A-35.

Private conversations and publicly available data from MFDE show that commercial and recreational vessels in the Santa Barbara port area 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. According to several fishers with knowledge of the area, fishing near Carpinteria Reef is often considered dangerous for vessels due to its shallow depth. Navigational charts and observations of breaking waves on the reef structure during certain conditions substantiate these accounts. Several commercial and recreational fishers noted that Armpit Reef, a hard-bottom structure located offshore of Carpinteria Reef, is a desirable and productive fishing location in the area that is fished when the islands are otherwise inaccessible. To preserve this option, we changed the southern boundary of the proposed Mishopshno SMCA so that Armpit Reef lies outside of the MPA boundaries, thereby maintaining locally accessible and frequented fishing locations for individual commercial and recreational vessels fishing in the area.

As stated in the original Mishopshno SMCA proposal, this MPA would allow for public access, all non-consumptive activities, and a Tribal take exemption for the SYBCI to fish with the use of hand-based equipment. After subsequent discussions with local stakeholders and Tribal members related to the consumptive activities noted above, we are proposing the below amendments to the original petition. These amendments will help limit direct, near-term impacts to extractive activities to the greatest extent possible, while still adhering to the Master Plan science-based size criteria and guidance around high levels of protection:

- Allow for the recreational take of finfish from shore using hook-and-line, promoting access to certain important marine and cultural resources for all Chumash people – including non-federally recognized Tribes
- Allow for recreational take of finfish from shore using hook-and-line for the public.
- Establish boundaries for the SMCA that leave Armpit Reef, the easternmost edge of Carpinteria Reef, and the associated kelp forest outside of the MPA's boundaries to allow for continued recreational and commercial fishing access to certain important local fishing grounds.

See "Boundary Description" and "Proposed Regulations" for more detail.

Conclusion

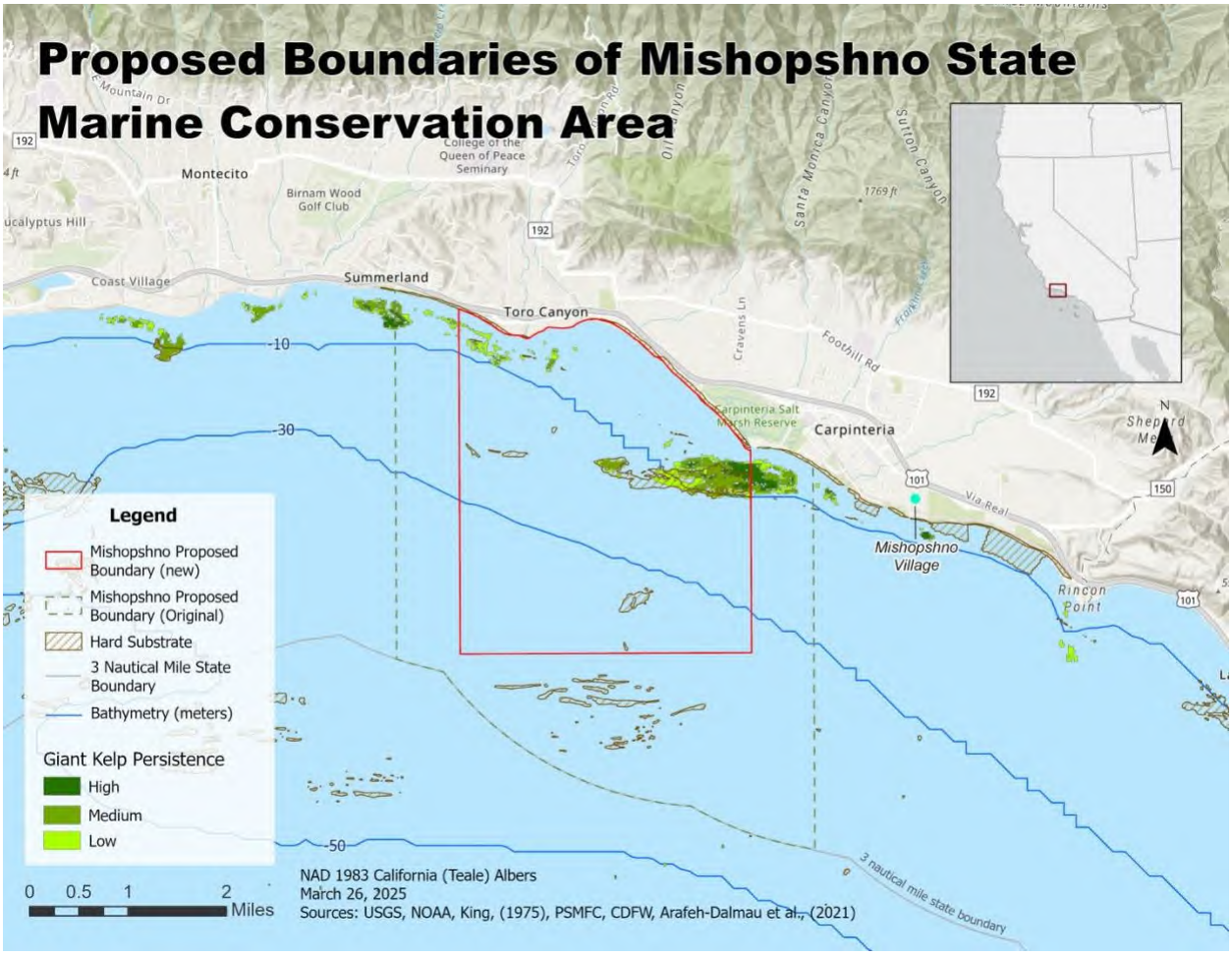
The proposed MPA would address a physical gap in the MPA network and increase the proportion of rocky reef habitat in the southern portion of the MPA network. Research focused on JWS has shown the waters off Carpinteria are a frequent hotspot for juvenile white sharks, offering specific habitat features that support this critical life stage. The proposed MPA would allow some forms of recreational fishing within its boundaries, and its boundaries are designed to allow fishing access to a popular offshore rocky reef area while still meeting the MLPA Science Advisory Team criteria and having a high level of protection. Finally, designation of the proposed MPA would add a new Tribal MPA in the region, strengthening the role of the Tribes in co-management, monitoring, and marine education activities.

Boundary Description

The proposed boundaries of the SMCA were informed by extensive outreach and discussions with local Tribes and fishers. The proposed boundaries meet a difficult-to-achieve compromise between upholding science-based size and area criteria,[49] protecting critical habitat and

[49] CDFW Master Plan for Marine Protected Areas 2016, Appendix A, page A-35.

promoting connectivity for the broader network, while allowing continued fishing access to important local fishing areas.



The western boundary is located at 119.54W, extending from the shore at Summerland to 34.37N. The eastern boundary is located at 119.58W, extending from the coast at Franklin Creek (also known as Santa Monica Creek) to 34.37N.

Area: 9.05 square miles

Shore adjacent distance: 3.63 miles

MPA coordinates:

1. SE: 119.53589W long. 34.366106N lat.
2. NE: 119.53589W long. 34.395977N lat.
3. NW: 119.587711W long. 34.416944N lat.
4. SW: 119.587711W long. 34.366106N lat.

The eastern boundary, located at the eastern shore of Santa Monica Creek at Salt Point, would ensure the protection of important habitat and food sources for JWS at the mouth of the Carpinteria Salt Marsh. This eastern boundary would allow for continued fishing access to the eastern edge of Carpinteria Reef and the eastern portion of its associated kelp forest. This eastern portion of the reef is a known popular fishing area for recreational fishers, especially

those who access the reef and kelp bed from the downshore sandy beach using public parking areas nearby. This placement would also provide a known, easily recognizable landmark and shoreline feature as the starting point for the eastern boundary of this MPA, allowing for a common, easily referenced understanding of this boundary per CDFW guidelines.[50]

The southern boundary would ensure protection of the ecologically important nearshore rocky reef and kelp habitat of Carpinteria Reef while allowing access to the popular fishing area offshore called Armpit Reef.

The western boundary, located just west of Loon Point, would ensure the protection of important sandy-bottom habitat for JWS off Padaro Beach and additional hard-bottom substrate and kelp forest cover around Loon Point. In addition to conserving these important habitats, the revised western boundary at this location would ensure the SMCA meets the Master Plan minimum size and spacing guidelines while allowing continued fishing opportunities in the areas west of Loon Point.

As described above, the proposed SMCA boundaries adhere to the Master Plan design guidelines. The designation of an SMCA that is smaller than these minimum size guidelines would hinder the area's ability to meet the design objectives and MLPA goals for which they were developed: protect adult populations; protect the diversity of species that live at different depths; and accommodate the movements of individuals across depth zones (MLPA goals 2 & 6).[51] It is therefore imperative that the SMCA be no smaller than these recommended minimum size guidelines.

Proposed Regulations

This petition proposes the following regulations for an SMCA for the region outlined above:

Take of all living, geological, or cultural marine resources is prohibited except:

1. *The following federally recognized tribe is exempt from the area and take regulations found in subsection 632(b)(9) of these regulations and shall comply with all other existing regulations and statutes:*
   The federally recognized tribe of the Santa Ynez Band of Chumash Indians.
   Within the proposed SMCA, the Chumash would be allowed to fish with the use of hand-based equipment. The proposed exemptions would be consistent with allowing Tribal take exemptions as currently defined in Title 14, §632(a)(11), which identify how a member of a federally recognized Tribe may be authorized to take living marine resources from an MPA with site-specific take restrictions. Members taking living marine resources under this provision are subject to current seasonal, bag, possession, gear and size limits in existing Fish and Game Code statutes and regulations of the Commission, except otherwise provided for in Title 14, §632(b).

2. *Scientific research pursuant to the MLPA regulations for SMCAs (14 C.F.R. section 632(a)(1)(C) is allowed.*

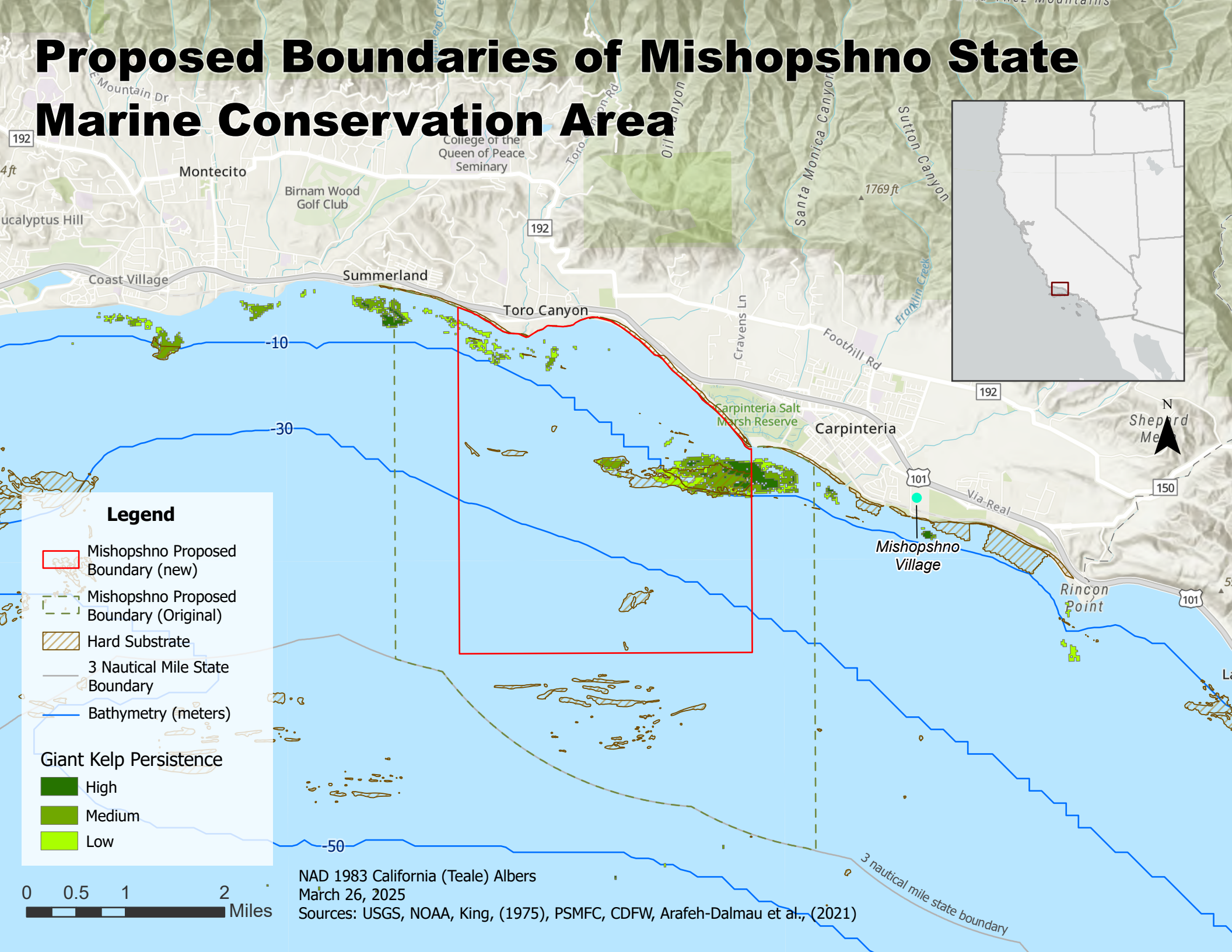
3. *Recreational take of finfish by hook-and-line from shore is allowed.*

[50] CDFW Master Plan for Marine Protected Areas 2016; Saarman et al. 2013
[51] CDFW Master Plan for Marine Protected Areas 2016, Appendix A.

These regulations would allow access to the area for scientific research and allow some recreational take using a low-impact gear type.[52] The regulations would allow use of shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the SYBCI and for non-federally recognized Chumash people. The state should consult with the SYBCI to formalize a co-management agreement for the SMCA. The SYBCI will work to include non-federally recognized Tribal members in the management of the area. With the regulations detailed above, the Mishopshno SMCA would qualify as a "highly protected" MPA according to science-based criteria set forth by The MPA Guide.[53] Research shows that fully and highly protected MPAs are more likely to benefit populations of targeted species, protect high levels of biodiversity, and promote ecosystem resilience.[54]

[52] Single lines (hooks, pole and line, rod, troll) and low-impact traditional extraction are identified by The MPA Guide as small-scale, selective gear with low impact and therefore compatible with highly protected MPAs. Grorud-Colvert, Kirsten, et al. 2021. "The MPA Guide: A Framework to Achieve Global Goals for the Ocean." Science, September. https://doi.org/10.1126/science.abf0861.
[53] Grorud-Colvert et al. 2021
[54] Grorud-Colvert et al. 2021

Proposed Boundaries of Mishopshno State Marine Conservation Area



NAD 1983 California (Teale) Albers
March 26, 2025
Sources: USGS, NOAA, King, (1975), PSMFC, CDFW, Arafeh-Dalmau et al., (2021)

Original Petition

State of California – Fish and Game Commission
PETITION TO THE CALIFORNIA FISH AND GAME COMMISSION FOR REGULATION CHANGE

Tracking Number: (2023-29MPA)

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: Lisa Suatoni
Address: Natural Resources Defense Council
Telephone number:
Email address:
Co-sponsors: Sam Cohen - Santa Ynez Band of Chumash Indians, Azsha Hudson - Environmental Defense Center

2. Rulemaking Authority (Required) - Reference to the statutory or constitutional authority of the Commission to take the action requested: Authority cited: Sections 200, 205(c), 265, 399, 1590, 1591, 2860, 2861 and 6750, Fish and Game Code; and Sections 36725(a) and 36725(e), Public Resources Code.

3. Overview (Required) – The attached document describes a proposal for an additional California-Chumash co-management SMCA in the south coast region to be named Mishopshno, following the ancestral Chumash village located in the area. The proposed MPA would prohibit the injury, damage, take, or possession of all living, geological, or cultural marine resources; and allow for enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians, who will work to extend access to other non-federally recognized Chumash people.

The proposed area aligns with state MPA design and feasibility guidelines provided by CDFW, and is bounded by the mean high tide line, the 3 nm state waters boundary, and straight lines connecting the following points in the order listed:

34.365392908 N lat. 119.6000000 W long. (SW corner)
34.419698650 N lat. 119.6000000 W long. (NW corner)
34.393513965 N lat. 119.525777354 W long. (NE corner)
34.336952256 N lat. 119.525777354 W long. (SE corner)

4. Rationale (Required) - Describe the problem and the reason for the proposed change: The intent of the SMCA is to 1) help meet the science guidelines for spacing between protected habitats, promoting connectivity in the network and representation of habitat types, 2) protect habitat attractive to marine wildlife, such as juvenile white sharks, and 3) allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians, who will work to extend access to other non-federally recognized Chumash people. See attached documentation for further details.

SECTION II: Optional Information

5. Date of Petition: 11/30/2023

6. Category of Proposed Change

☐ Sport Fishing
☐ Commercial Fishing
☐ Hunting
✖ Other, please specify: MPAs, Section 632

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): Westlaw Regulations
☐ 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

✖ 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: At the discretion of the Commission.

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

a. Proposed Mishopshno SMCA petition narrative
b. Appendix A – Expanded synthesis of juvenile white shark aggregation at proposed Mishopshno SMCA
c. Appendix B – Proposed Mishopshno SMCA letter of support

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: Unknown. However, this region is a popular fishing spot for spiny lobster and preventing take in the region may not be welcomed by recreational fishers in the area. Yet, research has shown an increase in lobster populations within MPAs and a resulting increase in lobster catch in neighboring zones. Recent work found that a 35% reduction in fishing area was compensated for by a 225% increase in total catch after 6-years, demonstrating local scale trade-offs provided benefits to fisheries.

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: 11/30/2023

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

Overview

The intent of this MPA is to 1) help meet the science guidelines for spacing between protected habitats, promoting connectivity in the network and representation of habitat types, 2) protect habitat attractive to marine wildlife, such as juvenile white sharks, and 3) allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians, who will work to extend access to other non-federally recognized Chumash people.

We propose a new SMCA named for a prominent Chumash coastal village that was historically proximate to the marine area to be protected – Mishopshno. This village was an important coastal site in the ancestral lands of the diverse Chumash people. It was the site of boatbuilding and a close connection to the marine environment. It was described by members of the Portolá expedition who encountered the town on August 17, 1769 as "...at the very edge of the sea a large village or very regular town here at this point, appearing at a distance as though it were a shipyard, because at the moment they were building a canoe that still had its topmost plank lacking from it (dubbed by soldiers La Carpinteria, the Carpenter Shop)."[1] The canoes described here were Tomol, Chumash watercraft built using sophisticated techniques for production of wooden planks and waterproofing with specialized local clay.[2]

Designation of a new Tribal MPA supports recent California and federal initiatives. To ensure 30% of state waters are fully protected by 2030 and to foster Tribal co-management, this petition proposes this additional Tribal co-management SMCA for the South Coast Region.[3] *This petition is co-sponsored by the federally recognized Santa Ynez Band of Chumash Indians, the Natural Resources Defense Council, and Environmental Defense Center.*

Rationale

1. Habitat, Spacing, & Connectivity

The MPA Network was designed to function as an ecological network to ensure the protection of California's diverse coastal ecosystems.[4] During the design and planning phase, a science advisory team identified the key metrics needed to achieve this connectivity, including MPA size, spacing, and key habitat representation and replication.[5] [6] Currently, mainland coastal MPAs in the Santa Barbara region, Campus Point and Point Dume, are approximately 64 nautical miles (nm) apart, 10 nm further than the recommended maximum MPA spacing distance of 54 nm to ensure ecological connectivity (Figure 1). This proposal aims to address that gap by adding a protected area around what is now called Carpinteria, CA and is the ancestral home of the Santa Ynez band of the Chumash Indians.

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[1] "Chapter 4: Historic Chumash Settlements on the Mainland Coast," in *The Chumash World at European Contact: Power, Trade, and Feasting Among Complex Hunter-Gatherers*, by Lynn H. Gamble, 2011.

[2] John Peabody Harrington et al., *TOMOL: Chumash Watercraft as Described in the Ethnographic Notes of John P. Harrington*, Ballena Press Anthropological Papers ; No. 9 (Socorro, N.M.: Ballena Press, 1978).

[3] McGinnis, M.V. and R. Cordero. Tribal Marine Protected Areas: Protecting Maritime Ways and Tribal Practices. A White Paper produced by the Wishtoyo Foundation. 2004.

[4] California Department of Fish and Wildlife, "California's Marine Protected Area Network Decadal Management Review," 2022, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=209209&inline.

[5] California Department of Fish & Wildlife, Master Plan for MPAs. 2008, 2016

[6] Emily Saarman et al., "The Role of Science in Supporting Marine Protected Area Network Planning and Design in California," *Ocean & Coastal Management* 74 (March 1, 2013): 45–56, https://doi.org/10.1016/j.ocecoaman.2012.08.021.

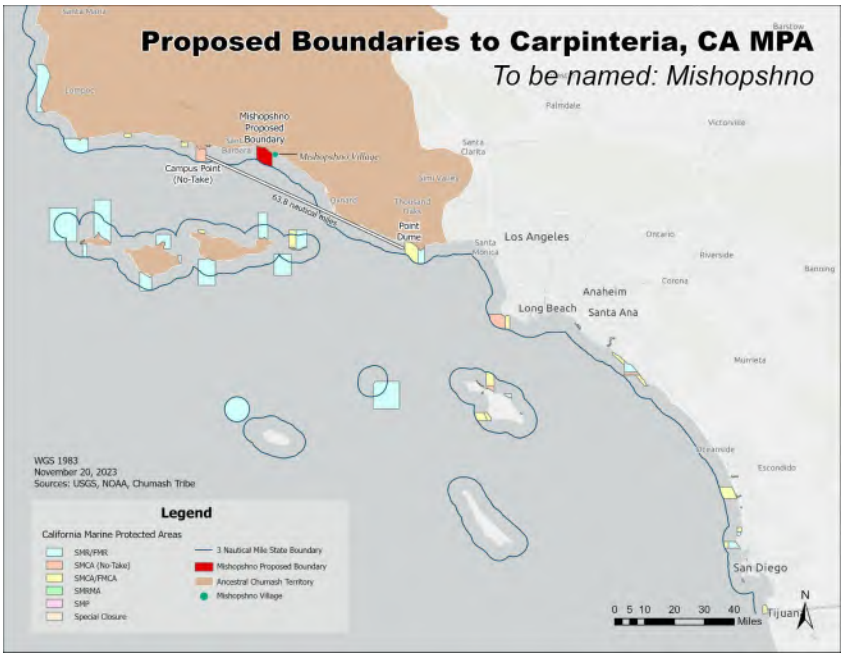

Figure 1: Map of southern California MPAs with the proposed SMCA near Carpinteria (to be called Mishopshno) shown in red. Distance between two existing MPAs at Campus Point and Point Dume (64nm) is indicated. This distance is greater than the maximum suggested spacing to ensure ecological connectivity. Mishopshno was one of the many Chumash villages in the region at the time of European colonization.

Carpinteria, initially proposed to be the site for an MPA in the original planning stages for the network, lies on the mainland coast north of the Channel Islands.[7] Within a relatively small area, the proposed region includes rocky reef, rocky intertidal, sandy habitats, sandy beaches, kelp forests, and surfgrass beds.[6] Associated with these habitat features are higher trophic level species including halibut, lobster, grunion, nearshore sharks and rays, and multiple harbor seal haulouts.[6] Research shows that MPAs with diversity of habitat types and depths facilitate increased connectivity among habitats.[8]

The proposed SMCA would include Carpinteria Salt Marsh Reserve, which protects a critically important Southern California estuary. The marsh lies adjacent to a sandy beach, subtidal rocky reef, and kelp beds enabling exchange of nutrients and a regional nursery for halibut and other marine and estuarine fish, which supports a productive nearshore marine ecosystem.[9] Carpinteria Reef, which would also be within the SMCA's boundaries, is a large area of rocky reef and kelp bed. The reef supports one of the more abundant marine life communities and persistent kelp beds in Santa Barbara County.[10]

Ecological connectivity modeling has advanced since the initial Network design process and has confirmed that the system is generally functioning as a network with high MPA to MPA connectivity that varies by habitat type.[11] Model outputs show that rocky intertidal, kelp forest,

[7] California MLPA South Coast Study Region, Description of Marine Protected Areas (MPAs) in Revised External MPA Proposal C (Round 2) Created May 14, 2009.
[8] Mark H. Carr et al., "The Central Importance of Ecological Spatial Connectivity to Effective Coastal Marine Protected Areas and to Meeting the Challenges of Climate Change in the Marine Environment," *Aquatic Conservation: Marine and Freshwater Ecosystems* 27, no. S1 (2017): 6–29, https://doi.org/10.1002/aqc.2800; Charlotte R. Hopkins et al., "Evaluating Whether MPA Management Measures Meet Ecological Principles for Effective Biodiversity Protection," *Acta Oecologica* 108 (October 1, 2020): 103625, https://doi.org/10.1016/j.actao.2020.103625.
[9] "Carpinteria Salt Marsh Reserve," July 9, 2015, https://ucnrs.org/reserves/carpinteria-salt-marsh-reserve/.
[10] Levenbach, Stuart. "Community-wide ramifications of an associational refuge on shallow rocky reefs." Ecology 89.10 (2008): 2819-2828.
[11] California Department of Fish and Wildlife, "California's Marine Protected Area Network Decadal Management Review."

and mid-depth rocky reef habitats inside MPAs provide more larvae to each other, as well as to areas outside MPAs, compared to non-MPA sites.[12] The habitat within the proposed Mishopshno site includes these representative habitat types and would thus contribute an additional node to the network thereby further increasing MPA-MPA connectivity. The south coast MPAs protect a lower proportion of rocky intertidal habitat than other regions.[13] Incorporation of the Mishopshno SMCA would expand the representation of rocky intertidal and rocky reef habitat in the region.

MPAs are particularly important as sources for kelp forests, which are a foundational species and present in the Mishopshno proposed boundaries.[14] The demographic connectivity of kelp patches is highly influenced by oceanography. In the region of Carpinteria and the Santa Barbara Channel, high resolution data on circulation and current patterns show that 1) there is rapid transport of water and associated larvae and propagules nearshore (within 1km of shore) which moves from east to west[15] and 2) the dominant current structure does not create strong connectivity from the Channel Island MPAs to the mainland.[16] Thus, proper spacing of mainland MPAs is needed to support connectivity for kelp and associated species.

Southern coast MPAs are likely to experience many warming events in the coming years. Inclusion of a diversity of upwelling regimes and habitat types in the network, such as those in the mainland and Channel Island MPAs, is thought to offer additional insurance against changing conditions.[13,16] As a general matter, ensuring proper spacing, placement, and consequently connectivity of southern mainland MPAs is increasingly important in light of climate change.

2. Habitat attractive to White Sharks (see Appendix A for further detail)

The habitat distribution for the northeast Pacific population of white sharks is broad, spanning from Baja California to a point northwest in the Bering Sea off the Aleutian Islands.[17] However, research suggests that juveniles of this population are utilizing a more narrow band of coastal waters for nursery habitat, stretching from the Southern California Bight to Baja.[18] Spatial data of white shark movements show that in areas off Carpinteria, CA, juvenile white sharks (JWS) form aggregations for periods of weeks to months.[19] These spatial patterns suggest that this habitat attracts JWS, frequently serving as an important white shark nursery, and thus warrants additional protections given the iconic status and vulnerability of the species.

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[12] California Department of Fish and Wildlife, “Decadal Management Review Appendix B: Science Guidance,” January 2023, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=207752&inline.

[13] Jennifer E. Caselle et al., “A Synthesis of Ecological and Social Outcomes from the California MPA Network (NCEAS Working Group Final Report),” text/xml (California Ocean Protection Council Data Repository, 2022), https://doi.org/10.25494/P6430V.c

[14] California Department of Fish and Wildlife, “DMR Appendix B,” 8.

[15] Daniel P. Dauhajre, James C. McWilliams, and Lionel Renault, “Nearshore Lagrangian Connectivity: Submesoscale Influence and Resolution Sensitivity,” *Journal of Geophysical Research: Oceans* 124, no. 7 (July 2019): 5180–5204, https://doi.org/10.1029/2019JC014943; S. Mitarai et al., “Quantifying Connectivity in the Coastal Ocean with Application to the Southern California Bight,” *Journal of Geophysical Research: Oceans* 114, no. C10 (2009), https://doi.org/10.1029/2008JC005166.

[16] Shelby L. Ziegler et al., “Marine Protected Areas, Marine Heatwaves, and the Resilience of Nearshore Fish Communities,” *Scientific Reports* 13, no. 1 (January 25, 2023): 1405, https://doi.org/10.1038/s41598-023-28507-1.

[17] Office of National Marine Sanctuary, “White Shark Conservation, White Shark Stewardship Project,” Government Website, Greater Farallones National Marine Sanctuary, accessed November 17, 2023, https://farallones.noaa.gov/eco/sharks/sharks_conservation.html.

[18] https://www.frontiersin.org/articles/10.3389/fmars.2021.645142/full

[19] James M. Anderson et al., “Interannual nearshore habitat use of young of the year white sharks off Southern California." *Frontiers in Marine Science* 8 (2021): 238.; Emily Spurgeon et al., “Quantifying Thermal Cues That Initiate Mass Emigrations in Juvenile White Sharks,” *Scientific Reports* 12, no. 1 (November 18, 2022): 19874, https://doi.org/10.1038/s41598-022-24377-1.

White sharks are listed under Appendix II of the Convention on International Trade of Endangered Species of Wild Fauna and Flora (CITES).[20] The species is slow to reach reproductive maturity and produces only a small number of young each year, making it vulnerable to human stressors.[21] Research conducted in the Southern California Bight has found that fisheries bycatch is likely the main source of mortality for JWS.[22] Another factor threatening white sharks is a warming climate and ocean that has led to many species' historic distribution changing. Changes in aggregation spots could place JWS young of the year in areas with greater threats from predation and human interactions.

Juvenile white sharks inhabit a narrow habitat range, choosing shallow habitats (< 1000 m deep) close to land (< 30 km of the shoreline) in waters ranging from 14 to 24°C.[23] They can form aggregations at these ideal locations and display a high degree of residency.[24] Historically, Southern California was a suitable habitat eight months of the year, while coastal habitats in Baja California were suitable year-round.[25] Recent research shows that the average observed white shark density in Carpinteria increased significantly across three years beginning in 2019.[26] Utilizing detection data, a study found a JWS hot spot at Padaro Beach in Carpinteria in the months from May to December in 2020.[27] In this study, the tagged individuals were observed across a stretch of coastline from Loon Point south to Carpinteria State Beach.[28] Padaro Beach was classified as an ideal JWS aggregation spot due to its sandy beach with a rocky reef adjacent to an estuary inlet and low wave energy compared to many of the other nursery habitats available.[29] Although it was previously believed that JWS do not show site fidelity, there is growing evidence that the Southern California Bight is a region of primary nursery habitat, with specific “hotspots” like Carpinteria beach attracting fairly stable aggregations, and that the suitability of the habitat has been increasing relative to areas further south as a result of climate change.

Conclusion

Recent research emphasizes that 1) mainland MPAs are unlikely to be well connected to Channel Island MPAs, 2) habitat types represented in the proposed Mishopshno MPA would contribute to connectivity and representation in the Network, and 3) decreasing spacing between mainland MPAs would increase ecological connectivity with direct impact on conservation success. Research focused on JWS has shown the waters off Carpinteria are a frequent hotspot for juvenile white sharks, offering specific habitat features that support this critical life stage. Finally, designation of the proposed MPA would add a Tribal MPA in the

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[20] Office of National Marine Sanctuary, “White Shark Conservation, White Shark Stewardship Project,” Government Website, Greater Farallones National Marine Sanctuary, accessed November 17, 2023, https://farallones.noaa.gov/eco/sharks/sharks_conservation.html.

[21] Ibid.

[22] John F. Benson et al., “Juvenile Survival, Competing Risks, and Spatial Variation in Mortality Risk of a Marine Apex Predator,” ed. Andre Punt, *Journal of Applied Ecology* 55, no. 6 (November 2018): 2888–97, https://doi.org/10.1111/1365-2664.13158.

[23] White, et al. Quantifying habitat selection and variability in habitat suitability for juvenile white sharks.

[24] Lyons, et al. The degree and result of gillnet fishery interactions with juvenile white sharks in southern California.

[25] Ibid.

[26] John K. Parsons, “Using Unoccupied Aerial Vehicles to Uncover Patterns of Density, Size Structure, and Distribution of White Sharks (Carcharodon Carcharias) at a Southern California Coastal Aggregation Site” (UC Santa Barbara, 2022), https://escholarship.org/uc/item/2f74m5fz.

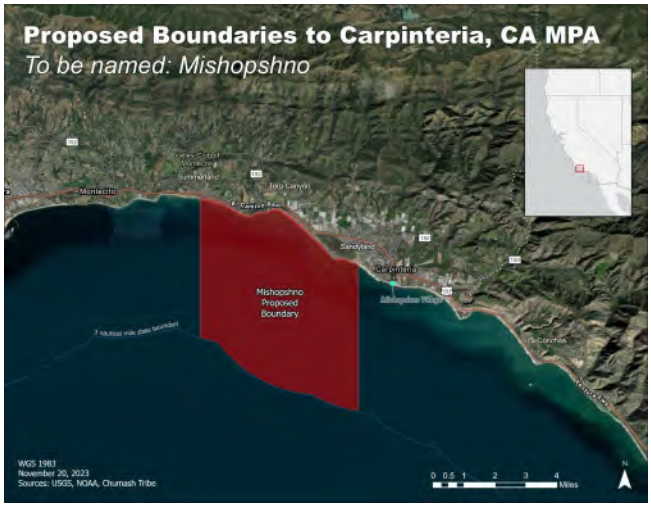
[27] Spurgeon, E., Anderson, J.M., Liu, Y. et al. Quantifying thermal cues that initiate mass emigrations in juvenile white sharks. Sci Rep 12, 19874 (2022). https://doi.org/10.1038/s41598-022-24377-1

[28] Ibid.

[29] Ibid.

region, strengthening the role of the Tribes in co-management, monitoring, and marine education activities.

Boundary Description



Northern boundary is located at the 119.60 W longitudinal line extending from the shore at Summerland, north of Loon Point out to the 3 nm state boundary. The southern boundary of the proposed MPA lies at the northern end of Carpinteria State Beach.

Area: 67.85 km^2

Shore adjacent distance: 9.75km

MPA coordinates:

1. 34.365392908 N lat. 119.6000000 W long. (SW corner)
2. 34.419698650 N lat. 119.6000000 W long (NW corner)
3. 34.393513965 N lat. 119.525777354 W long. (NE corner)
4. 34.336952256 N lat. 119.525777354 W long. (SE corner)

Suggested Regulations

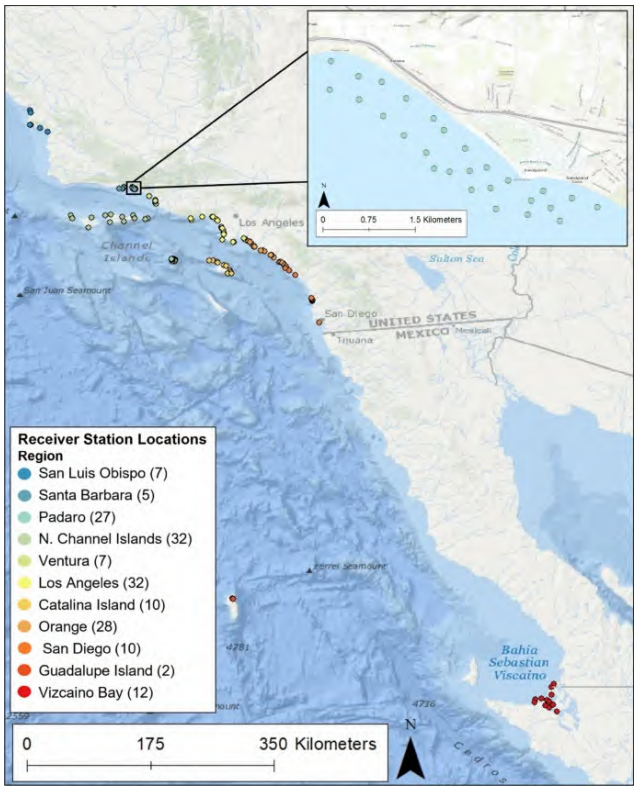
This petition proposes an SMCA for the region north of Carpinteria State Beach outlined above. Take of all living, geological, or cultural marine resources is prohibited except:

1. The following federally recognized tribe is exempt from the area and take regulations found in subsection 632(b)(9) of these regulations and shall comply with all other existing regulations and statutes:
The federally recognized tribe of the Santa Ynez Band of Chumash Indians.
Within the proposed SMCA, the Chumash would be allowed to fish with the use of hand-based equipment. The proposed exemptions would be consistent with allowing tribal take exemptions as currently defined in Title 14, §632(a)(11), which identify how a member of a federally recognized tribe may be authorized to take living marine resources from an MPA with site-specific take restrictions. Members taking living marine resources under this provision are subject to current seasonal, bag, possession, gear and size limits in existing Fish and Game Code statutes and regulations of the Commission, except otherwise provided for in Title 14, §632(b).

2. Scientific research pursuant to the MLPA regulations for SMCAs. (14 C.F.R. section 632(a)(1)(C).

Appendix A – Expanded synthesis of juvenile white shark aggregation at proposed Mishopshno SMCA

The habitat distribution for the northeast Pacific population of white sharks is broad, spanning from Baja California to a point northwest in the Bering Sea off the Aleutian Islands.[1] However, research suggests that juveniles of this population are utilizing a more narrow band of coastal waters for nursery habitat, stretching from the Southern California Bight to Baja.[2] In particular, spatial data of white shark movement show that in areas off Carpinteria, California, juvenile white sharks (JWS) form aggregations for periods of weeks to months.[3] These spatial patterns suggest that this region is serving as an important white shark nursery and thus warrants additional protections for this iconic and vulnerable species.



The locations of acoustic receivers along the California and Mexican coastline. Each color represents a region where (n) receivers are located. The inset map shows the higher density receiver array at Padaro Beach, CA. Map was produced using ArcMap™ version 10.8.1 with the "Ocean" basemap. https://www.arcgis.com/home/item.html?id=5ae9e138a17842688b0b79283a4353f6.[4]

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[1]"White Shark Conservation, White Shark Stewardship Project | Greater Farallones National Marine Sanctuary," accessed November 30, 2023, https://farallones.noaa.gov/eco/sharks/sharks_conservation.html.

[2]James M. Anderson et al., "Interannual Nearshore Habitat Use of Young of the Year White Sharks Off Southern California," Frontiers in Marine Science 8 (2021), https://www.frontiersin.org/articles/10.3389/fmars.2021.645142.

[3] Emily Spurgeon et al., "Quantifying Thermal Cues That Initiate Mass Emigrations in Juvenile White Sharks," *Scientific Reports* 12, no. 1 (November 18, 2022): 19874, https://doi.org/10.1038/s41598-022-24377-1.

[4] Spurgeon, E., Anderson, J.M., Liu, Y. *et al.* Quantifying thermal cues that initiate mass emigrations in juvenile white sharks. *Sci Rep* 12, 19874 (2022). https://doi.org/10.1038/s41598-022-24377-1

White Sharks are listed under Appendix II of the Convention on International Trade of Endangered Species of Wild Fauna and Flora (CITES).[5] The species is slow to reach reproductive maturity and produces only a small number of young each year, making it vulnerable to human stressors.[6] One of the largest threats to white shark survival rates is the impact from fisheries as bycatch. Many studies have indicated white sharks are caught as bycatch from fisheries in the northeastern Pacific.[7] Research conducted in the Southern California Bight has shown that fisheries bycatch is the main source of mortality for JWS in this region.[8] Juvenile survival rate is critical to the growth of white shark populations.[9] Another factor threatening white sharks is a warming climate and ocean that has led to many species' historic distribution changing. Juvenile white sharks have a narrow temperature range that they inhabit, and known aggregation spots are no longer viable or preferred due to changing oceans.[10] Changes in aggregation spots could place JWS and young of the year (YOY) in areas with greater threats from predation and human interactions.

Habitat selection differs greatly between adult and juvenile white sharks, which can be explained by differences in diet, size, and temperature preferences. Young white sharks can be classified into three classes: neonate, YOY, and juvenile. Newborn white sharks are about 4-5 feet in size and JWS range from 6-9 feet. Compared to an adult white shark, whose size ranges from 10-20 feet, YOY and JWS likely lack sufficient body mass and thermal inertia required to maintain a warmer body temperature.[11] This may indicate a sensitivity to temperature lending some explanation for YOY and JWS near-shore habitat preference. Adult white sharks travel further from coastal areas and make deeper dives compared to JWS.[12] Juvenile white sharks (JWS) choose shallow habitats (< 1000 m deep) close to land (< 30 km of the shoreline) in waters ranging from 14 to 24°C.[13] They can form aggregations at these ideal locations and display a high degree of residency.[14]

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[5] "White Shark Conservation, White Shark Stewardship Project | Greater Farallones National Marine Sanctuary."
[6] Ibid.
[7] Kady Lyons et al., "The Degree and Result of Gillnet Fishery Interactions with Juvenile White Sharks in Southern California Assessed by Fishery-Independent and -Dependent Methods," *Fisheries Research* 147 (October 1, 2013): 370–80, https://doi.org/10.1016/j.fishres.2013.07.009; "Status Review of the Northeastern Pacific Population of White Sharks (Carcharodon Carcharias) under the Endangered Species Act," accessed November 30, 2023, https://repository.library.noaa.gov/view/noaa/17705.
[8] John F. Benson et al., "Juvenile Survival, Competing Risks, and Spatial Variation in Mortality Risk of a Marine Apex Predator," *Journal of Applied Ecology* 55, no. 6 (2018): 2888–97, https://doi.org/10.1111/1365-2664.13158.
[9] Enric Cortés, "Incorporating Uncertainty into Demographic Modeling: Application to Shark Populations and Their Conservation," *Conservation Biology* 16, no. 4 (2002): 1048–62, https://doi.org/10.1046/j.1523-1739.2002.00423.x.
[10] Bowlby, H. D., Dicken, M. L., Towner, A. V., Waries, S., Rogers, T., & Kock, A. (2023). Decline or shifting distribution? A first regional trend assessment for white sharks (Carcharodon carcharias) in South Africa. *Ecological Indicators*, *154*, 110720.
[11] Dewar, H., Domeier, M. & Nasby-Lucas, N. Insights into young of the year white shark, Carcharodon carcharias, behavior in the Southern California Bight. Environ. Biol. Fishes https://doi.org/10.1023/B:EBFI.0000029343.54027.6a.pdf (2004).
[12] Hoyos-Padilla, E.M., Klimley, A.P., Galván-Magaña, F. et al. Contrasts in the movements and habitat use of juvenile and adult white sharks (Carcharodon carcharias) at Guadalupe Island, Mexico. Anim Biotelemetry 4, 14 (2016). https://doi.org/10.1186/s40317-016-0106-7
[13] White, et al. Quantifying habitat selection and variability in habitat suitability for juvenile white sharks.
[14] Lyons, et al. The degree and result of gillnet fishery interactions with juvenile white sharks in southern California.

Young of year and juvenile white sharks have been observed to reside in California waters during the summer months and migrate south to Baja during the winter months.[15] However, anecdotal evidence suggests that the distribution and/or migratory patterns of JWSs may be shifting northward – with more individuals staying in southern California throughout the entire year.[16]

Recent research shows that the average observed white shark density in the Carpinteria area increased significantly across three years beginning in 2019.[17] Utilizing detection data, a study found a JWS hot spot at Padaro Beach off Carpinteria in the months from May to December in 2020.[18] In this study, the tagged individuals were observed across approximately a 5.5 km stretch of coastline from the area of Loon Point south to Carpinteria State Beach.[19] Padaro Beach was classified as an ideal JWS aggregation spot due to its sandy beach with a rocky reef adjacent to an estuary inlet and is considered to have low wave energy compared to many of the other nursery habitats available.[20]

Historically, Southern California was a suitable habitat eight months of the year, while coastal habitats in Baja California were suitable year-round.[21] A warming climate and ocean has redefined the oceanographic conditions of the Southern California Bight. Point Conception is defined as a terrestrial headland that sharply separates the warmer waters of the southern California Bight from the northern remnant of the California Current Ecosystem. From 2014 to 2020, the mean position of this oceanographic demarcation moved 240 km north of Point Conception to 36.3° N.[22] Current climate projections for the future indicate this shift will likely become stable.[23] This area is known to have different species assemblages due to the significant temperature difference between the two currents, with habitat composition also reflecting this. Scientists anticipate that a shift in the boundary of current temperatures will lead to a shift in distribution and presence of adult and juvenile white sharks, potentially making the Southern California Bight even more important to successful white shark recruitment.

Juvenile aggregation spots generally provide an appropriate food supply, ideal physical conditions, and reduced predation for immature individuals, thereby increasing survival rates compared to other habitats.[24] There is growing evidence that the Southern California Bight is

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[15] Weng, K., O'Sullivan, J., Lowe, C., Winkler, C., Blasius, M., Loke-Smith, K., et al. (2012). "Back to the wild," in Global Perspectives on the Biology and Life History of the White Shark, ed. M. Domeier (Boca Raton, FL: CRC Press), 419–446. doi: 10.1201/b11532-32

[16] Spurgeon, E., Anderson, J.M., Liu, Y. et al. Quantifying thermal cues that initiate mass emigrations in juvenile white sharks. Sci Rep 12, 19874 (2022). https://doi.org/10.1038/s41598-022-24377-1

[17] John K. Parsons, "Using Unoccupied Aerial Vehicles to Uncover Patterns of Density, Size Structure, and Distribution of White Sharks (Carcharodon Carcharias) at a Southern California Coastal Aggregation Site" (UC Santa Barbara, 2022), https://escholarship.org/uc/item/2f74m5fz.

[18]Spurgeon, E., Anderson, J.M., Liu, Y. et al. Quantifying thermal cues that initiate mass emigrations in juvenile white sharks. Sci Rep 12, 19874 (2022). https://doi.org/10.1038/s41598-022-24377-1

[19] Ibid.

[20] Ibid.

[21] Ibid.

[22] Kisei R. Tanaka et al., "North Pacific Warming Shifts the Juvenile Range of a Marine Apex Predator," *Scientific Reports* 11, no. 1 (February 9, 2021): 3373, https://doi.org/10.1038/s41598-021-82424-9.

[23] Jie Cao et al., "A Novel Spatiotemporal Stock Assessment Framework to Better Address Fine-Scale Species Distributions: Development and Simulation Testing," *Fish and Fisheries* 21, no. 2 (2020): 350–67, https://doi.org/10.1111/faf.12433.

[24] Michelle R. Heupel, John K. Carlson, and Colin A. Simpfendorfer, "Shark Nursery Areas: Concepts, Definition, Characterization and Assumptions," *Marine Ecology Progress Series* 337 (May 14, 2007):

becoming an increasingly important habitat for juvenile white sharks, with specific locations like the Carpentaria beach being especially suitable, attracting fairly stable aggregations.

Recent research focused on JWS has shown they have site loyalty to the Carpinteria area, and specific habitat needs that are present in the Carpinteria waters. An additional MPA in this area would offer further insurance against the impacts of anthropogenic disturbance, reducing bycatch risk in the face of warming water temperatures and changing habitat suitability.

287–97, https://doi.org/10.3354/meps337287; Maria J. Rocha, ed., *Fish Reproduction* (Boca Raton: CRC Press, 2011), https://doi.org/10.1201/b10747.

November 30, 2023

Eric Sklar, President
California Fish and Game Commission
715 P Street, 16th Floor
Sacramento, CA 95814

Re: <u>Decadal Management Review Marine Protected Areas Petition Process: Carpinteria, CA</u>

Dear President Sklar and Honorable Commissioners:

Thank you for the opportunity to submit recommendations for the adaptive management of California's Marine Protected Area (MPA) network as part of the Decadal Management Review (DMR) process. The undersigned organizations submit this letter in strong support of the designation of a new State Marine Conservation Area (SMCA) in Carpinteria beginning at Loon Point to the western end of Carpinteria State Beach.

Proposed as an MPA site in the initial Marine Life Protection Act (MLPA) planning process, Carpinteria, lies on the mainland coast north of the Channel Islands. Carpinteria holds deep cultural significance for the Chumash people, whose territory once spanned from Malibu to Paso Robles. Given the rich cultural ties that the traditional stewards of this land and waters have to this day, we support naming the SMCA after a Chumash coastal village from the region – Mishopshno. In addition, we support regulations that allow access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the Chumash, within proposed SMCA boundaries.

The Carpinteria area is ecologically rich and diverse. Carpinteria Reef supports one of the more abundant marine life communities and persistent kelp beds in Santa Barbara County. The Carpinteria Reef and Salt Marsh are biologically linked with crucial exchange of nutrients and extensive interaction between marine and estuarine organisms. The Carpinteria Salt Marsh Reserve protects a critically important Southern California estuary and serves as an important

regional nursery for halibut and other marine and estuarine fish. Carpinteria is also an important habitat for the north Pacific population of white sharks. Recent research has shown that juvenile white sharks (JWS) have site loyalty to Carpinteria and specific habitat needs that are present in the Carpinteria waters. Padaro Beach, located within the proposed SMCA boundaries, can be classified as an ideal JWS aggregation spot due to its sandy beach with a rocky reef adjacent to an estuary inlet and low wave energy compared to many of the other nursery habitats available. White sharks are slow to reach reproductive maturity and produce only a small number of young each year, making them highly susceptible to the threats of fishing and other human activities. Designating an SMCA that restricts commercial and recreational fishing in this location will reduce threats faced by this keystone species and help reach California's goal to protect and grow the white shark population.

In addition, the Carpinteria Reef is recognized as one of the most popular recreational diving and kayaking destinations in Santa Barbara County. There are also extensive community outreach efforts in place at both the Salt Marsh and the State Beach, including an on-site interpretative center, teaching amphitheater, and nature trail. As well as extensive ongoing research and educational activities like University courses, monthly bird surveys, habitat restoration and removal of invasive exotic plants, frequent local school visits, weekly docent tours, and field trips by the Santa Barbara Museum of Natural History.

Protecting Carpinteria's waters will not only improve recreational, educational, and research opportunities for the local community but also help ensure the overall MPA network remains a viable and useful tool to ensure coastal ecosystem conservation. Currently, the closest coastal MPAs to the Santa Barbara region are Campus Point SMCA and Point Dume State Marine Reserve (SMR). These are 64 nautical miles apart—10 nautical miles further than the recommended distance (27-54 nautical miles) identified by the science advisory team to ensure network ecological connectivity. Creating this MPA will protect critical nearshore shallow and intertidal habitats and help meet the science guidelines for spacing between protected habitats and representation of habitat types. Furthermore, we believe this petition strongly aligns with the goals set by the California Marine Life Protection Act (MLPA).

Our organizations celebrate the success of the MPA network and the Commission's continued work to protect our state's biodiversity at a time when ocean conservation wins are more important than ever. Thank you for the opportunity to express our 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 a critical marine habitat.

Sincerely,

Dennis Arguelles
Southern California Director
National Parks Conservation Association

Steve Bardwell
President
Morongo Basin Conservation Association

Joe Connett
Member
Sierra Club Santa Barbara-Ventura Chapter

Laura Deehan
State Director
Environment California Research and Policy Center

Rikki Eriksen
Director of Marine Spatial Ecology
California Marine Sanctuary Foundation

Pamela Flick
California Program Director
Defenders of Wildlife

Pamela Heatherington
Board of Directors
Environmental Center of San Diego

Azsha Hudson
Marine Conservation Analyst
Environmental Defense Center

Susan Jordan
Executive Director
California Coastal Protection Network

Ted Morton
Executive Director
Santa Barbara Channelkeeper

Kristie Orosco
Tribal Partnerships Senior Manager
The Wilderness Society

Robin Pelc
Principal Scientist
SeaChange Scientific Consulting, LLC

Harry Rabin
Founder, Reef Guardians
Program Director, Heal the Ocean

Teresa Romero
President
Native Coast Action Network

Dan Silver
Executive Director
Endangered Habitats League

Tomas Valadez
California Policy Associate
Azul

Robert Vergara
Roger Arliner Young (RAY) Ocean Conservation Fellow
Natural Resources Defense Council

Erin Woolley
Senior Policy Strategist
Sierra Club California

Overview

The intent of this marine protected area (MPA) is to 1) help improve MPA Network design to better align with~~meet~~ the Master Plan design guidelines for spacing between protected habitats, promoting connectivity in the network and representation of habitat types, 2) protect habitat important to marine wildlife, such as juvenile white sharks (JWS), and 3) restore management to the Santa Ynez Band of Chumash Indians (SYBCI) of this portion of coastal waters. This petition calls for a co-management agreement between the State of California and the SYBCI and continued access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for all Chumash people.

We propose a new SMCA named Mishopshno for a prominent Chumash coastal village that was proximate to the marine area to be protected. Mishopshno village was an important coastal site in the ancestral lands of the diverse Chumash people because of its use for boatbuilding and its close proximity to the ocean. It was described by members of the Portolá expedition who encountered the town on August 17, 1769 as "...at the very edge of the sea a large village or very regular town here at this point, appearing at a distance as though it were a shipyard, because at the moment they were building a canoe that still had its topmost plank lacking from it (dubbed by soldiers La Carpinteria, the Carpenter Shop)."[1] The canoes described here were tomol, Chumash watercraft built using sophisticated techniques for production of wooden planks and waterproofing with specialized local clay.[2] Chumash tomol paddlers still use the area to practice for their annual crossing to Limuw, also known as Santa Cruz Island.

Designation of a new Tribal MPA supports California and Biden era federal initiatives to enhance tribal co-management.[3] The Mishopshno SMCA would provide an additional Tribal co-management MPA for the South Coast and is an example of two of the four coastal 30x30 "key strategies:" 1) adaptive management of the MPAs network, and 2) advancing Tribally led conservation.[4] Further, it would help advance Recommendation 2 of the CDFW DMR Report, "Create a Pathway to Tribal Co-Management."[5] *This petition is co-sponsored by the federally recognized Santa Ynez Band of Chumash Indians, the Natural Resources Defense Council, and Environmental Defense Center.*

Rationale

[1] Lynn H. Gamble, "Historic Chumash Settlements on the Mainland Coast," in *The Chumash World at European Contact: Power, Trade, and Feasting Among Complex Hunter-Gatherers* (University of California Press, 2011).

[2] John Peabody Harrington et al., *TOMOL: Chumash Watercraft as Described in the Ethnographic Notes of John P. Harrington*, Ballena Press Anthropological Papers ; No. 9 (Socorro, N.M.: Ballena Press, 1978).

[3] California Department of Fish and Wildlife, *California's Marine Protected Area Network Decadal Management Review,* 2022, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=209209&&inline.; State of California, *Pathways to 30x30: Accelerating Conservation of California's Nature,* April 2022, https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/30-by-30/Final_Pathwaysto30x30_042022_508.pdf; AB-1284 Tribal ancestral lands and waters: cogovernance and comanagement agreements. (2023-2024) https://leginfo.legislature.ca.gov/faces/billStatusClient.xhtml?bill_id=202320240AB1284; U.S. Secretary Of Agriculture, Secretary Of Interior, and Secretary Of Commerce, "Joint Secretarial Order on Fulfilling the Trust Responsibility to Indian Tribes in the Stewardship of Federal Lands and Waters," 2021, https://www.doi.gov/sites/doi.gov/files/elips/documents/joint-so-3403-a1_0.pdf.

[4] Wishtoyo Foundation, *Tribal Marine Protected Areas: Protecting Maritime Ways and Practice,* 2004, https://static1.squarespace.com/static/5459dd35e4b0eb18b9b5599b/t/56bb76be859fd0422da8978d/1455126215937/TribalMPAsWhitePaper.pdf

[5] CDFW, *California's Marine Protected Area Network Decadal Management Review,* 2022

1. Habitat, Spacing, & Connectivity

The MPA Network was designed to function as an ecological network to ensure the protection of California's diverse coastal ecosystems.[6] During the design and planning phase, a science advisory team (SAT) identified the key metrics needed to achieve network connectivity, including MPA size, spacing, and key habitat representation and replication.[7] Currently, mainland coastal MPAs in the Santa Barbara region, Campus Point and Point Dume, are approximately 60~~74~~ miles apart.~~, 12 miles further~~ This spacing falls just within t~~than t~~he recommended ~~maximum~~ MPA spacing distance of 31-62 miles to ensure ecological connectivity, and presents the largest gap in the network between mainland MPAs (Figure 1).[8] This proposal aims to decrease~~address~~ that spacing gap by adding a protected area around what is now called Carpinteria, CA (the ancestral home of the Chumash people~~SYBCI~~).

[6] CDFW, *California's Marine Protected Area Network Decadal Management Review,* 2022

[7] California Department of Fish and Wildlife, *Master Plan for Marine Protected Areas,* 2016 https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=112487&inline.; Saarman, Emily, et al., 2013. "The Role of Science in Supporting Marine Protected Area Network Planning and Design in California." Ocean & Coastal Management, Special Issue on California's Marine Protected Area Network Planning Process, 74 (March):45–56. https://doi.org/10.1016/j.ocecoaman.2012.08.021.

[8] CDFW *Master Plan for Marine Protected Areas* 2016, Appendix A, page A-35.

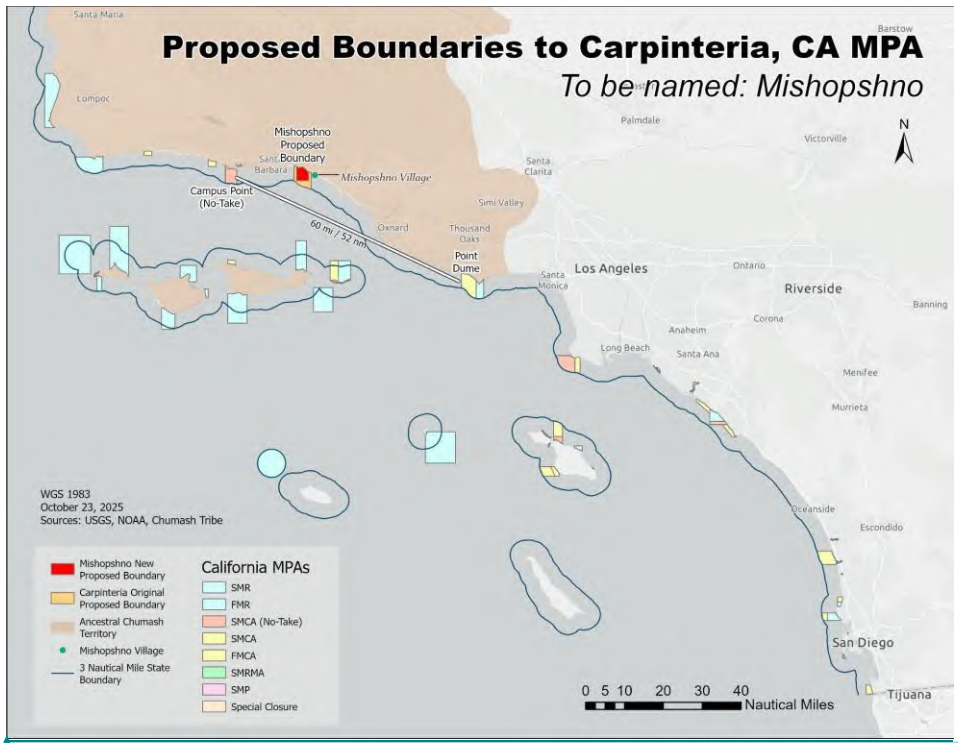

Figure 1: Map of southern California MPAs with the proposed SMCA near Carpinteria shown in red. The 60 mi / 5264 nm distance between two existing MPAs at Campus Point and Point Dume is indicated. This distance falls just within~~is greater than~~ the maximum suggested spacing to ensure ecological connectivity. Mishopshno was one of the many Chumash villages in the region at the time of European colonization.

Carpinteria, initially proposed to be the site for an MPA in the original planning stages for the network, lies on the mainland coast north of the Channel Islands.[9] Within a relatively small area, a diversity of habitat types exist including rocky reef, rocky intertidal, sandy habitats, sandy beaches, kelp forests, and surfgrass beds. Associated with these habitat features are higher trophic level species including halibut, lobster, nearshore sharks and rays, and multiple harbor seal haulouts. Research shows that MPAs with a diversity of habitat types and depths facilitate increased connectivity among habitats.[10]

The proposed SMCA would protect the marine waters adjacent to Carpinteria Salt Marsh Reserve, which protects a critically important Southern California estuary. The marsh lies

[9] California MLPA South Coast Study Region, Description of Marine Protected Areas (MPAs) in Revised External MPA Proposal C (Round 2) Created May 14, 2009.

[10] Carr, Mark H., et al., 2017. "The Central Importance of Ecological Spatial Connectivity to Effective Coastal Marine Protected Areas and to Meeting the Challenges of Climate Change in the Marine Environment." Aquatic Conservation: Marine and Freshwater Ecosystems 27 (S1): 6–29. https://doi.org/10.1002/aqc.2800; Hopkins, Charlotte R., et al., 2020. "Evaluating Whether MPA Management Measures Meet Ecological Principles for Effective Biodiversity Protection." Acta Oecologica 108 (October):103625. https://doi.org/10.1016/j.actao.2020.103625.

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adjacent to a sandy beach, subtidal rocky reef, and kelp beds, enabling the exchange of nutrients. The marsh also provides a regional nursery for halibut and other marine and estuarine fish, which supports a productive nearshore marine ecosystem.[11] Carpinteria Reef, part of which would be within the SMCA's boundaries, is a large rocky reef with kelp beds. The reef supports one of the more abundant marine life communities and persistent kelp beds in Santa Barbara County.[12] The proposed SMCA encompasses 90% of local biodiversity and counts as a "replicate," as determined from biological surveys, for the following habitat types: kelp forest (2.2 mile length), beaches (3.6 mile length), and nearshore (0-30m) soft bottom substrate (3.2 mile length).[13] The proposed SMCA also contains the following habitat types: hardened shores (1.7 mile length), tidal flats (0.1 mile length), nearshore hard-bottomed substrate (0.34 square mile area and 0.2 mile length at 0-30m depth), deeper hard-bottomed substrate (0.02 square mile area at 30-100m depth), and deeper soft-bottom substrate (2.94 square mile area at 30-100m depth).[14] Furthermore, the South Coast MLPA Planning region protects a lower proportion of nearshore hard-bottomed habitat than other regions.[15] Incorporation of the Mishopshno SMCA would increase the representation of these habitat types for the region.

Ecological connectivity modeling has advanced since the initial network design process. Recent studies have confirmed that the system is generally functioning as an effective network, and that MPAs are well-connected both demographically and environmentally.[16] In addition, modeling results suggest that the positive effect of MPAs on the size and abundance of species within their boundaries also enhances their contribution to larval connectivity outside their boundaries.[17] The proposed Mishopshno SMCA may further this beneficial contribution, by providing an additional MPA in the network with increased larval and reproductive output.

In the coming decades, ocean temperature thresholds will be exceeded more often because of the combination of marine heatwaves and long-term warming.[18] The inclusion of a diversity of upwelling regimes and habitat types in California's MPA network, such as those in the mainland and Channel Island MPAs, is thought to offer additional insurance against changing conditions.[19] As a general matter, ensuring proper spacing, placement, and consequently connectivity of southern mainland MPAs is increasingly important in light of climate change.[20]

2. Habitat attractive to White Sharks (see Appendix A for further detail)

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[11] University of California Natural Reserve System, "Carpinteria Salt Marsh," accessed September 2023, https://ucnrs.org/reserves/carpinteria-salt-marsh-reserve/.

[12] Levenbach, Stuart. 2008. "Community-Wide Ramifications of an Associational Refuge on Shallow Rocky Reefs." Ecology 89 (10): 2819–28. https://doi.org/10.1890/07-0656.1.

[13] SeaSketch, "California MPA Petitions," https://www.seasketch.org/california/app. Accessed March 11, 2025.

[14] SeaSketch, "California MPA Petitions," https://www.seasketch.org/california/app. Accessed March 11, 2025.

[15] Jennifer E. Caselle, et al., "A Synthesis of Ecological and Social Outcomes from the California Marine Protected Area (MPA) Network", 2023, https://opc.ca.gov/wp-content/uploads/2023/01/NCEAS_MPA_Report_Final.pdf.

[16] CDFW Decadal Management Review 2022; Yeager ME, et al., *Assessing connectivity across the California Marine Protected Area Network*, 2023, https://opc.ca.gov/wp-content/uploads/2024/10/MPA-Connectivity-Final-Report-508.pdf.

[17] Yeager et al. 2023.

[18] Frölicher, Thomas L., Erich M. Fischer, and Nicolas Gruber. 2018. "Marine Heatwaves under Global Warming." Nature 560 (7718): 360–64. https://doi.org/10.1038/s41586-018-0383-9; Laufkötter, Charlotte, Jakob Zscheischler, and Thomas L. Frölicher. 2020. "High-Impact Marine Heatwaves Attributable to Human-Induced Global Warming." Science 369 (6511): 1621–25. https://doi.org/10.1126/science.aba0690.

[19] Shelby L. Ziegler et al. 2023, "Marine Protected Areas, Marine Heatwaves, and the Resilience of Nearshore Fish Communities," *Scientific Reports* 13, no. 1 (January 25, 2023): 1405, https://doi.org/10.1038/s41598-023-28507-1.

[20] Carr et al. 2017

The habitat distribution for the northeast Pacific population of white sharks is broad, spanning from Baja California to a point northwest in the Bering Sea off the Aleutian Islands.[21] However, research suggests that juveniles of this population are utilizing a narrower band of coastal waters for nursery habitat, stretching from the Southern California Bight to Baja.[22] Spatial data of white shark movements show that in areas off Carpinteria, JWS form aggregations for periods of weeks to months.[23] These spatial patterns suggest that this habitat attracts JWS, and that the area serves as an important white shark nursery.

White sharks are listed under Appendix II of the Convention on International Trade of Endangered Species of Wild Fauna and Flora (CITES).[24] The species is slow to reach reproductive maturity and produces only a small number of young each year, making it vulnerable to human stressors.[25] Research conducted in the Southern California Bight has found that fisheries bycatch is likely the main source of mortality for JWS.[26] Another factor threatening white sharks is a warming climate and ocean that has led to many species' historic distribution changing.

Juvenile white sharks inhabit a narrow habitat range, choosing shallow habitats (< 1000 m deep) close to land (< 30 km of the shoreline) in waters ranging from 14 to 24°C.[27] They can form aggregations at these ideal locations and display a high degree of residency.[28] Historically, Southern California was a suitable habitat eight months of the year, while coastal habitats in Baja California were suitable year-round.[29] Recent research shows that the average observed white shark density in Carpinteria increased significantly across three years beginning in 2019.[30] Utilizing detection data, a study found a JWS hot spot at Padaro Beach in Carpinteria in the months from May to December in 2020.[31] In this study, the tagged individuals were observed across a stretch of coastline from Loon Point south to Carpinteria State Beach.[32] Padaro Beach was classified as an ideal JWS aggregation spot due to its sandy beach with a rocky reef adjacent to an estuary inlet and low wave energy compared to many of the other nursery

[21] Office of National Marine Sanctuary, "White Shark Conservation, White Shark Stewardship Project," Government Website, Greater Farallones National Marine Sanctuary, accessed November 17, 2023, https://farallones.noaa.gov/eco/sharks/sharks_conservation.html.
[22] Anderson, James M., et al., 2021. "Interannual Nearshore Habitat Use of Young of the Year White Sharks Off Southern California." Frontiers in Marine Science 8 (March). https://doi.org/10.3389/fmars.2021.645142.
[23] Anderson et al. 2021; Spurgeon, Emily, et al., 2022. "Quantifying Thermal Cues That Initiate Mass Emigrations in Juvenile White Sharks." Scientific Reports 12 (1): 19874. https://doi.org/10.1038/s41598-022-24377-1.
[24] Office of National Marine Sanctuary 2023.
[25] Ibid.
[26] Benson, John F., et al., 2018. "Juvenile Survival, Competing Risks, and Spatial Variation in Mortality Risk of a Marine Apex Predator." Journal of Applied Ecology 55 (6): 2888–97. https://doi.org/10.1111/1365-2664.13158.
[27] White, Connor F. et al., 2019. "Quantifying Habitat Selection and Variability in Habitat Suitability for Juvenile White Sharks." PLOS ONE 14 (5): e0214642. https://doi.org/10.1371/journal.pone.0214642.
[28] Lyons, Kady, et al., 2013. "The Degree and Result of Gillnet Fishery Interactions with Juvenile White Sharks in Southern California Assessed by Fishery-Independent and -Dependent Methods." Fisheries Research 147 (October):370–80. https://doi.org/10.1016/j.fishres.2013.07.009.
[29] Ibid.
[30] John K. Parsons, "Using Unoccupied Aerial Vehicles to Uncover Patterns of Density, Size Structure, and Distribution of White Sharks (Carcharodon Carcharias) at a Southern California Coastal Aggregation Site" (UC Santa Barbara, 2022), https://escholarship.org/uc/item/2f74m5fz.
[31] Spurgeon et al. 2022.
[32] Ibid.

habitats available.[33] Although it was previously believed that JWS do not show site fidelity, there is growing evidence that the Southern California Bight is a region of primary nursery habitat, with specific "hotspots" like Carpinteria attracting fairly stable aggregations, and that the suitability of the habitat has been increasing relative to areas further south as a result of climate change.

3. The Importance of Tribally led Marine Stewardship and Tribal Co-Management

The Marine Life Protection Act (MLPA) did not direct how state agencies were to engage or consult with Tribes during the establishment process of California's MPA network, and does not acknowledge coastal Indigenous peoples' long-standing relationships to, dependence on, and stewardship of marine resources.[34] During the MLPA implementation process, there were opportunities for Tribes to engage in stakeholder groups through the Blue Ribbon Task Force and regional stakeholder process. However, Tribes are sovereign nations and require government-to-government consultation. These factors resulted in California Tribes' initial opposition to the creation of the MPA network – many Tribes were fearful the MLPA could restrict Indigenous cultures and ways of life.

By the time the MLPA planning process came to the fourth and final coastal region, the North Coast, Tribes in the North were raising concerns about the lack of an official consultation with Tribal Nations on MPA designations in their ancestral waters. This resulted in state agencies implementing a consultation process that included Tribes as sovereigns and creating the exemption of "Tribal take," to ensure that Tribes would retain access to their cultural and subsistence resources.[35] In the years following the MPA network's implementation, Tribes, state agencies, and policymakers have made extensive progress to encourage and facilitate Tribal marine co-management and access in MPAs.[36]

Now, as California is conducting its first-ever adaptive management process, there is an opportunity to more thoroughly include the groups that were underrepresented during the initial implementation of the network, both Tribal and non-Tribal entities. This petition and Petition 2023-19MPA for the Chitqawi SMCA are the first Tribally proposed state MPAs in California. Designating this MPA would strengthen the role and authority of California Tribes in the state's ocean and marine life protection efforts. With co-management, the Mishopshno MPA would also contribute to the integration of Tribes in California's marine monitoring and management initiatives. Furthermore, this proposal aligns with the state's goal of supporting Tribally led conservation.[37]

Socioeconomic Considerations

[33] Ibid.

[34] Curtis G. Berkey & Scott W. Williams, 2019, "California Indian Tribes and the Marine Life Protection Act: The Seeds of a Partnership to Preserve Natural Resources," 43 AM. INDIAN L. REV. 307, https://digitalcommons.law.ou.edu/ailr/vol43/iss2/2; California Marine Life Protection Act. https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=FGC&division=3.&title=&part=&chapter=10.5.&article=

[35] Berkey and Williams 2019

[36] McGinnis 2022

[37] *"30x30: Conserving 30% of California's Coastal Waters by 2030 - California Ocean Protection Council."* California Ocean Protection Council, 7 Jan. 2025, opc.ca.gov/30x30/.

This area holds special importance for residents and visitors engaging in ocean and coastal recreation, for local Chumash people engaging in cultural and subsistence practices, and for commercial and recreational fishers.

Carpinteria is a popular area for surfers, swimmers, kayakers, birdwatchers, beach walkers, freedivers, shore fishers, and more. For instance, there are multiple surf schools in the area, and vessels cluster along the shore during the summer to observe JWS.[38] By making the ocean healthier and more resilient to climate change, strong marine protections help safeguard everyone's ability to enjoy these areas through a variety of recreational activities, far into the future. Enhanced ocean protections can also benefit our economy, as millions of visitors travel to California's iconic coastline each year to recreate and enjoy a healthy ocean, supporting our state's blue economy. In 2023, ocean tourism brought just over $2 billion in travel-related spending to Santa Barbara County and supported more than 20,000 jobs.[39]

One of the primary goals of this SMCA is to honor the Chumash people's cultural heritage and continued relationship with their ancestral lands and waters. Many culturally significant species for the Chumash are found in Carpinteria and the area proposed for protection, including but not limited to: sheep and kelp crab, Giant keyhole limpet, California mussel, Pacific sand dollar, several octopus species, wavy turban snail, California cone snail, harbor seal, leopard shark, brown pelican, Heerman's gull, Brandt's cormorant, double-crested cormorant, and more.[40] As mentioned previously, Chumash tomol paddlers use the beaches and waters of the Carpinteria area to practice for their annual crossing to Limuw, also known as Santa Cruz Island. Local Chumash people also fish from shore for cultural, recreational, and subsistence purposes, typically using hook-and-line gear.

This is a popular area for recreational fishing as well. The sandy shores of Santa Claus and Padaro Beaches are known as particularly desirable surf fishing locations. Carpinteria Reef and its associated kelp forest provide critical habitat for many marine species, including several targeted by recreational fishers.[41] The nearby sandy beaches provide a safe entry point for people entering the water in California's often challenging coastal ocean conditions (e.g. large surf or swell), making this area a popular spearfishing and freediving location. Spearfishing can have a substantial negative effect on populations of marine fishes with small home ranges due to the targeted selection of larger individuals, which have the highest reproductive output. Some popular spearfishing and freediving targets, such as California sheephead, many species of rockfish, kelp bass (also known as calico bass), and California spiny lobster, have small home ranges and have been shown to benefit from the protections of California MPAs.[42]

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[38] Personal communications to local businesses and residents, February – March 2025.

[39] Visit California, 2024. The Economic Impact of Travel in California. https://industry.visitcalifornia.com/research/economic-impact.

[40] Wishtoyo Foundation 2004; Santa Barbara Coastal LTER Data Catalog, https://sbclter.msi.ucsb.edu/data/catalog/, accessed September 2023.

[41] While our request to CDFW for recreational lobster fishing data from this area was being processed at time of submission, several conversations with local fishers confirm that Carpinteria Reef is a popular area for recreational lobster fishing by hand.

[42] California MPA Long Term Monitoring Program Final Reports: 1) Carr et al. 2021, Monitoring and Evaluation of Kelp Forest Ecosystems in the MLPA Marine Protected Area Network, https://caseagrant.ucsd.edu/system/files/2022-06/Kelp%20Forest%20Technical%20Report%20Narrative_v2.pdf 2) Hamilton et al. California Collaborative Fisheries Research Program (CCFRP) – Monitoring and Evaluation of California Marine Protected Areas. https://caseagrant.ucsd.edu/sites/default/files/CCFRP_Final_Report.pdf.

Commercial fishing and fishing by commercial passenger fishing vessels (CPFVs) also occurs in this area. The proposed Mishopshno SMCA makes up 18% of California fishing block number 652. According to publicly available data accessed via the Marine Fisheries Data Explorer (MFDE), commercial fishing in this block represents an extremely small proportion of landings for the Santa Barbara Port Area, both by weight and value. In 2023, landings from fishing block 652 represented 0.22% of total landings by weight, and 1.1% of total landings by value, reported for the Santa Barbara Port Area from Southern California waters.[43] Over the previous ten-year period from 2013-2023, fisheries landings from fishing block 652 represented 0.16% of total landings by weight, and 0.63% of total landings by value, reported for the Santa Barbara Port Area from Southern California waters.

The MDFE data shows fishing block 652 represents a very small percentage of landings for halibut and California spiny lobster as well, which are both important commercial fisheries in the area. In 2023, halibut landings from block 652 represented 0.5% of total halibut landings by weight, and 0.6% of total halibut landings by value for the Santa Barbara Port Area. [44] Over the previous ten-year period from 2013-2023, halibut landings from this block represented 4.3% of total halibut landings by weight, and 3.9% of total halibut landings by value for the Santa Barbara Port Area. In 2023, California spiny lobster landings from block 652 represented 2.2% of total lobster landings by weight, and 2.2% of total lobster landings by value for the Santa Barbara Port Area. Over the previous ten-year period from 2013-2023, California spiny lobster landings from this block represented 2% of total lobster landings by weight, and 1.9% of total lobster landings by value for the Santa Barbara Port Area from Southern California waters.

Considering the above data and the size of the proposed Mishopshno SMCA, which makes up 18% of fishing block 652, we anticipate that closing this area to commercial fishing would have limited impact on overall commercial fisheries landings for the Santa Barbara Port Area. Overall, regional and statewide fishery landings and values were not negatively impacted by California's MPAs.[45] The commercial California spiny lobster fishery in the Santa Barbara region has seen significant benefits from MPAs – commercial landings more than doubled in the six years after local MPAs were established, with fishermen able to "fish the line" to intercept mature lobster leaving the MPAs.[46] A 35% reduction in fishing area resulted in a 225% increase in total catch, "indicating at a local scale that the trade-off of fishing ground for no-fishing zones benefitted the fishery."[47]

However, we are sensitive to the fact that the proposed MPA would limit some fishing access in the Carpinteria area and understand that these data above do not necessarily mean an MPA designation would not have an impact on individual fishers and businesses. In 2023, the latest year with data available, a total of 15 fishers, 19 businesses, and 16 vessels reported landings from fishing block 652. With this in mind, discussions with local fishers and fishing

[43] Southern California waters defined as all fishing blocks from Point Conception to the US-Mexico border (blocks 652-2035): https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=227793&inline.

[44] Including California halibut, Pacific halibut, and "Unspecified halibut" as reported in the MFDE

[45] Murray, Samantha, and Tyler T. Hee. 2019. "A Rising Tide: California's Ongoing Commitment to Monitoring, Managing and Enforcing Its Marine Protected Areas." Ocean & Coastal Management 182 (December):104920. https://doi.org/10.1016/j.ocecoaman.2019.104920.

[46] Lenihan, Hunter S., et al., 2021. "Evidence That Spillover from Marine Protected Areas Benefits the Spiny Lobster (Panulirus Interruptus) Fishery in Southern California." Scientific Reports 11 (1): 2663. https://doi.org/10.1038/s41598-021-82371-5.

[47] Lenihan et al. 2021

representatives have helped to further characterize the nature and spatial distribution of fishing in the area proposed for protection. We have amended the proposed SMCA's size and boundaries to exclude some of the preferred fishing areas and reduced the proposal as much as the Master Plan's scientifically informed size guidelines allow (see "Boundary Description" below).[48]

Private conversations and publicly available data from MFDE show that commercial and recreational vessels in the Santa Barbara port area 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. According to several fishers with knowledge of the area, fishing near Carpinteria Reef is often considered dangerous for vessels due to its shallow depth. Navigational charts and observations of breaking waves on the reef structure during certain conditions substantiate these accounts. Several commercial and recreational fishers noted that Armpit Reef, a hard-bottom structure located offshore of Carpinteria Reef, is a desirable and productive fishing location in the area that is fished when the islands are otherwise inaccessible. To preserve this option, we changed the southern boundary of the proposed Mishopshno SMCA so that Armpit Reef lies outside of the MPA boundaries, thereby maintaining locally accessible and frequented fishing locations for individual commercial and recreational vessels fishing in the area.

As stated in the original Mishopshno SMCA proposal, this MPA would allow for public access, all non-consumptive activities, and a Tribal take exemption for the SYBCI to fish with the use of hand-based equipment. After subsequent discussions with local stakeholders and Tribal members related to the consumptive activities noted above, we are proposing the below amendments to the original petition. These amendments will help limit direct, near-term impacts to extractive activities to the greatest extent possible, while still adhering to the Master Plan science-based size criteria and guidance around high levels of protection:

- Allow for the recreational take of finfish from shore using hook-and-line, promoting access to certain important marine and cultural resources for all Chumash people – including non-federally recognized Tribes
- Allow for recreational take of finfish from shore using hook-and-line for the public.
- Establish boundaries for the SMCA that leave Armpit Reef, the easternmost edge of Carpinteria Reef, and the associated kelp forest outside of the MPA's boundaries to allow for continued recreational and commercial fishing access to certain important local fishing grounds.

See "Boundary Description" and "Proposed Regulations" for more detail.

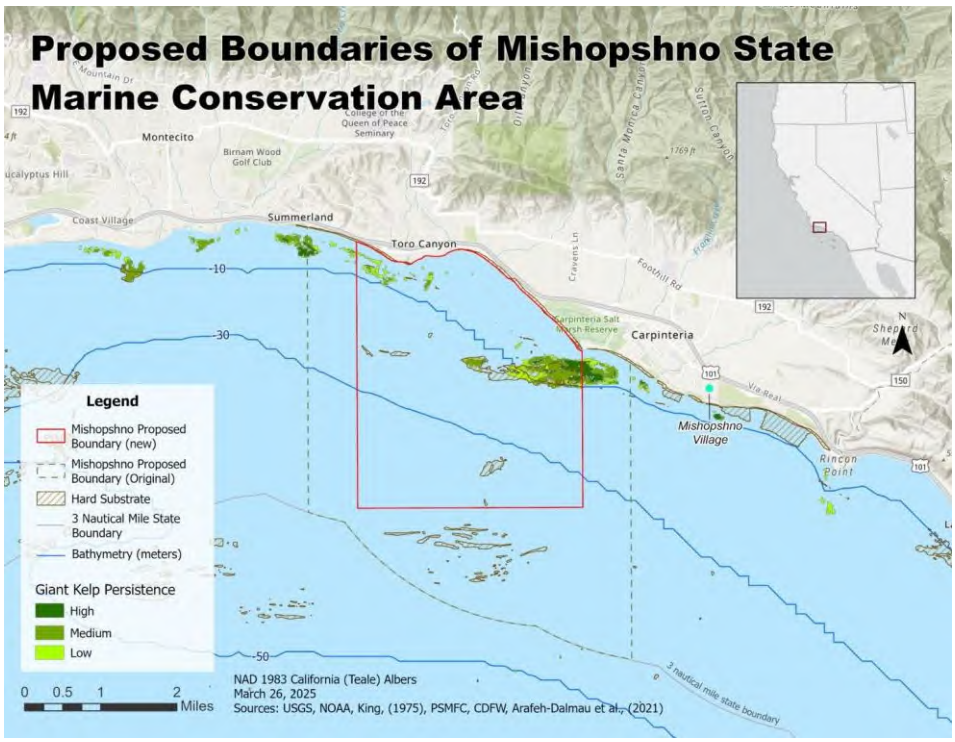
Conclusion

The proposed MPA would address a physical gap in the MPA network and increase the proportion of rocky reef habitat in the southern portion of the MPA network. Research focused on JWS has shown the waters off Carpinteria are a frequent hotspot for juvenile white sharks, offering specific habitat features that support this critical life stage. The proposed MPA would allow some forms of recreational fishing within its boundaries, and its boundaries are designed to allow fishing access to a popular offshore rocky reef area while still meeting the MLPA Science Advisory Team criteria and having a high level of protection. Finally, designation of the proposed MPA would add a new Tribal MPA in the region, strengthening the role of the Tribes in co-management, monitoring, and marine education activities.

[48] CDFW Master Plan for Marine Protected Areas 2016, Appendix A, page A-35.

Boundary Description

The proposed boundaries of the SMCA were informed by extensive outreach and discussions with local Tribes and fishers. The proposed boundaries meet a difficult-to-achieve compromise between upholding science-based size and area criteria,[49] protecting critical habitat and promoting connectivity for the broader network, while allowing continued fishing access to important local fishing areas.



The western boundary is located at 119.53689W~~4W~~, extending from the shore at Summerland to 34.366106N~~37N~~. The eastern boundary is located at 119.58868W~~W~~, extending from the coast at Franklin Creek (also known as Santa Monica Creek) to 34.366106N~~37N~~.

Area: 9.05 square miles

Shore adjacent distance: 3.63 miles

MPA coordinates:

1. 1. SE: 119.53689W long. 34.366106N lat.

[49] CDFW Master Plan for Marine Protected Areas 2016, Appendix A, page A-35.

2. 2. NE: 119.53689W long. 34.395977N lat.
3. 3. NW: 119.58868W long. 34.416944N lat.
1. 4. SW: 119.58868W long. 34.366106N lat. ~~SE: 119.53589W long. 34.366106N lat.~~
~~2. NE: 119.53589W long. 34.395977N lat.~~
~~3. NW: 119.587711W long. 34.416944N lat.~~
4. ~~SW: 119.587711W long. 34.366106N lat.~~

The eastern boundary, located at the eastern shore of Santa Monica Creek at Salt Point, would ensure the protection of important habitat and food sources for JWS at the mouth of the Carpinteria Salt Marsh. This eastern boundary would allow for continued fishing access to the eastern edge of Carpinteria Reef and the eastern portion of its associated kelp forest. This eastern portion of the reef is a known popular fishing area for recreational fishers, especially those who access the reef and kelp bed from the downshore sandy beach using public parking areas nearby. This placement would also provide a known, easily recognizable landmark and shoreline feature as the starting point for the eastern boundary of this MPA, allowing for a common, easily referenced understanding of this boundary per CDFW guidelines.[50]

The southern boundary would ensure protection of the ecologically important nearshore rocky reef and kelp habitat of Carpinteria Reef while allowing access to the popular fishing area offshore called Armpit Reef.

The western boundary, located just west of Loon Point, would ensure the protection of important sandy-bottom habitat for JWS off Padaro Beach and additional hard-bottom substrate and kelp forest cover around Loon Point. In addition to conserving these important habitats, the revised western boundary at this location would ensure the SMCA meets the Master Plan minimum size and spacing guidelines while allowing continued fishing opportunities in the areas west of Loon Point.

As described above, the proposed SMCA boundaries adhere to the Master Plan design guidelines. The designation of an SMCA that is smaller than these minimum size guidelines would hinder the area's ability to meet the design objectives and MLPA goals for which they were developed: protect adult populations; protect the diversity of species that live at different depths; and accommodate the movements of individuals across depth zones (MLPA goals 2 & 6).[51] It is therefore imperative that the SMCA be no smaller than these recommended minimum size guidelines.

Proposed Regulations

This petition proposes the following regulations for an SMCA for the region outlined above:

Take of all living, geological, or cultural marine resources is prohibited except:

1. *The following federally recognized tribe is exempt from the area and take regulations found in subsection 632(b)(9) of these regulations and shall comply with all other existing regulations and statutes:*
   The federally recognized tribe of the Santa Ynez Band of Chumash Indians.
   Within the proposed SMCA, the Chumash would be allowed to fish with the use of hand-based equipment. The proposed exemptions would be consistent with allowing Tribal take exemptions as currently defined in Title 14, §632(a)(11), which identify how a

[50] CDFW Master Plan for Marine Protected Areas 2016; Saarman et al. 2013
[51] CDFW Master Plan for Marine Protected Areas 2016, Appendix A.

member of a federally recognized Tribe may be authorized to take living marine resources from an MPA with site-specific take restrictions. Members taking living marine resources under this provision are subject to current seasonal, bag, possession, gear and size limits in existing Fish and Game Code statutes and regulations of the Commission, except otherwise provided for in Title 14, §632(b).

2. *Scientific research pursuant to the MLPA regulations for SMCAs (14 C.F.R. section 632(a)(1)(C) is allowed.*

3. *Recreational take of finfish by hook-and-line from shore is allowed.*

These regulations would allow access to the area for scientific research and allow some recreational take using a low-impact gear type.[52] The regulations would allow use of shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the SYBCI and for non-federally recognized Chumash people. The state should consult with the SYBCI to formalize a co-management agreement for the SMCA. The SYBCI will work to include non-federally recognized Tribal members in the management of the area. With the regulations detailed above, the Mishopshno SMCA would qualify as a "highly protected" MPA according to science-based criteria set forth by The MPA Guide.[53] Research shows that fully and highly protected MPAs are more likely to benefit populations of targeted species, protect high levels of biodiversity, and promote ecosystem resilience.[54]

[52] Single lines (hooks, pole and line, rod, troll) and low-impact traditional extraction are identified by The MPA Guide as small-scale, selective gear with low impact and therefore compatible with highly protected MPAs. Grorud-Colvert, Kirsten, et al. 2021. "The MPA Guide: A Framework to Achieve Global Goals for the Ocean." Science, September. https://doi.org/10.1126/science.abf0861.

[53] Grorud-Colvert et al. 2021

[54] Grorud-Colvert et al. 2021

California Fish and Game Commission

Compilation of Public Comments on Petition 2023-29MPA_AM1

This PDF file compiles public comments that were included as exhibits in meeting materials and supplemental handouts for Commission and Marine Resources Committee (MRC) meetings since November 2023. Additional exhibits and supplemental handouts will be added after each Commission meeting, including those received by the public comment deadline, until the Commission takes final action on the petition.

Note: Commission meeting materials include a representative selection of comments, rather than a comprehensive suite of all related comments received. Given the large volume of public comments received, the Commission has directed staff to summarize comments and provide a representative selection in meeting materials to reflect the range of perspectives shared. Commissioners are able to review a diversity of perspectives while still having access to all individual comments submitted, which are part of the Commission's administrative record. Members of the public may contact staff for access to any written comments not included in this document.

Last updated: through April 21, 2026 FGC

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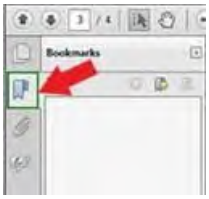
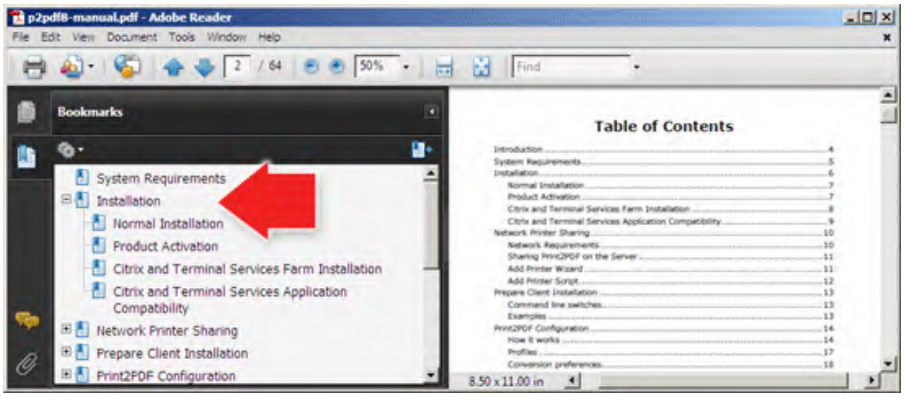
2. If a bookmark panel does not automatically appear on either the top or left side of the screen, click/tap on the “bookmark symbol” located near the top left-hand corner.



3. To make adjustments to the view, use the Page Display option in the View tab. You should see something like:



4. We suggest leaving open the bookmark panel to help you move efficiently among the comments in the packet. It’s helpful to think of these bookmarks as a table of contents that allows you to go to specific points in the packet without having to scroll through hundreds of pages.

5. You can resize the two panels by placing your cursor in the dark, vertical line located between the panels and using a long click /tap to move in either direction.

6. You may also adjust the sizing of the documents by adjusting the sizing preferences located on the Page Display icons found in the top toolbar or in the View tab.

7. Do not hesitate to contact staff if you have any questions or would like assistance.

From: Andrew Raaf <[redacted]>
Sent: Wednesday, January 17, 2024 03:38 PM
To: FGC <FGC@fgc.ca.gov>
Subject: Mishopsho MPA proposal

Hello, please find the attached comment letter regarding the recent MPA proposals. Best,

Andrew Raaf - [redacted]
Environmental Manager
Santa Barbara County Flood Control District
Cell: [redacted]
Fax: 805-568-3434

130 E Victoria Street, Suite 200
Santa Barbara, CA 93101

Santa Barbara County Flood Control & Water Conservation District and Water Agency

130 E. Victoria Street, Suite 200, Santa Barbara, California 93101
(805) 568-3440 FAX: (805) 568-3434
Web: http://www.countyofsb.org/pwd/water

Scott McGolpin
Public Works Director

Walter Rubalcava
Deputy Public Works Director

January 17, 2024

RE: Proposed Mishopshno SMCA 2023-29MPA

TO: Fish and Game Commission and involved participants:

Thank you for the opportunity to comment on the recent MPA petitions.

Santa Barbara County Flood Control District does not generally take a position on fishing regulations; however the proposed boundaries and restrictions of the Mishopshno SMCA may have unintended consequences on the County's public safety obligations.

Carpinteria Salt Marsh, which I understand to be included in the proposed SMCA regulations, is a UC Natural Reserve and a cooperatively managed community drainage feature. The Salt Marsh serves an integral role in the Carpinteria Valley Watershed Project; as a managed ecosystem the Marsh requires periodic dredging and maintenance. Any proposed restrictions associated with SMCA designation should accommodate ongoing maintenance dredging and operations to retain public safety and to restore tidal influence to the Marsh. In 2023, for example, the marsh channels filled with sediment which eliminated most of the open-water habitat available to fish and other aquatic species. After dredging was performed to restore open water channels, we noted leopard sharks and striped mullet returning to the marsh almost immediately.

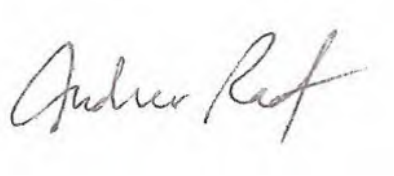
Carpinteria Salt Marsh is already a no-fishing zone due to its status as a UC Natural Reserve; the SMCA designation would not impart any additional environmentally protective status but could encumber operations and research projects already underway.

The area proposed for Mishopshno SMCA also includes nearshore waters at the Marsh mouth and eastward through Carpinteria City beaches. The nearshore waters at the Marsh mouth and Carpinteria beach access points are designated operational areas for flood control maintenance such as dredging and beach-sediment operations. While it is unclear what effect the SMCA designation may have on dredge discharge and beach operations, we are concerned that the designation may encumber important public safety efforts, beach nourishment, emergency operations, sea-level rise adaptation, dune restoration, and coastal flood response programs that have taken years to develop.

The County Public Works Department's recommendation would be to exclude Carpinteria Salt Marsh and the ¾ mile stretch of coastline from the Marsh mouth to Linden Ave beach from the SMCA proposal. The remaining

boundary of the proposed SMCA would still serve the intended purposes of the SMCA while not impeding important public works operations for the County and City of Carpinteria.

Thank you,



Andrew Raaf -
Environmental Manager
Santa Barbara County Flood Control District
Fax: 805-568-3434

From: Doug Bush <[redacted]>
Sent: Friday, January 26, 2024 10:41 AM
To: Wildlife Kelp <[redacted]>
Cc: FGC <FGC@fgc.ca.gov>
Subject: petition 2023-29MPA

Please be aware that there is a petition for consideration in the Feb FGC meeting 2023-29MPA to create a new MPA in the Summerland and Carpinteria area. The economic impacts considered in the application do not make any consideration of kelp harvest. There are beds in that proposed area that have been historically used for harvest and are presently included in our FGC approved mechanical kelp harvesting plan. Please ensure that this information is included in the binder and should require that this petition cannot proceed without further consideration by affected stakeholders.

_____

douglas bush
managing member/gm
the cultured abalone farm, llc
[redacted]

From: Erin Maker <[redacted]>
Sent: Wednesday, January 31, 2024 3:13 PM
To: FGC <FGC@fgc.ca.gov>
Cc: Nick Bobroff <[redacted]>; John Ilasin <[redacted]>; Michael Ramirez <[redacted]>
Subject: City of Carpinteria Comments RE: Agenda Item 10 Petition 2023-29MPA

Good afternoon,

Please find attached the City of Carpinteria's comments regarding Agenda Item 10 on the Fish and Game Commission's February agenda.

Thank you,

Erin Maker
Environmental Program Manager
Sustainability Division

Phone: [redacted]

www.carpinteriaca.gov

CITY of CARPINTERIA, CALIFORNIA

January 31, 2024

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

RE: Proposed Mishopshno State Marine Conservation Area

Dear Commissioners,

Thank you for the opportunity to comment on the proposed Mishopshno State Marine Conservation Area (SMCA), as submitted by the National Resources Defense Council. We appreciate the chance to provide feedback on this important initiative aimed at preserving our coastal marine environment. The proposed SMCA would extend from north of Loon Point to the easternmost boundary of Carpinteria City Beach, with the intention of prohibiting the take of all living, geological, or cultural marine resources.

The City of Carpinteria recognizes the importance of preserving local natural resources and recognizes the significance of the coastal marine area, including the Carpinteria Reef, in providing diverse habitat for numerous species. However, the City seeks assurances that establishment of the Mishopshno SMCA will not interfere with existing City operations or preclude local citizens from accessing and enjoying the coastal marine area.

The City offers the following specific comments on the proposed SCMA:

1. **Subsistence Fishing/Recreational Fishing:** The Mishopshno SMCA provides a narrow exemption to the take regulations only for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. The City is concerned this exemption is too narrow and blocks access to those subsistence and recreational fishermen who currently depend on the coast and local marine resources within the proposed SMCA area. The City believes it is essential to highlight the importance of access for individuals who may not have access to other fishing areas due to limitations such as mobility or transportation constraints. Providing opportunities for subsistence and recreational fishing within the proposed SMCA is crucial for ensuring equitable access to marine resources.

2. **Submerged Lands:** The City is unique in that a majority of its land area (4.7 square miles of the total 7.3 square mile area of the city) is in tidelands that extend from the shoreline a distance of two miles offshore. The City has approximately 2.5 miles of shoreline within the city limits (see attached map). This presents a unique situation that

5775 CARPINTERIA AVENUE • CARPINTERIA, CA 93013-2603
(805) 684-5405 • FAX (805) 684-5304
www.CarpinteriaCA.gov

must be carefully considered in the establishment of the Mishopshno SMCA. While the California Department of Fish and Wildlife retains authority over marine resources, it is important to acknowledge the jurisdictional complexities and ensure clarity in the management of these submerged lands within the MPA framework.

Operations and Maintenance: Carpinteria City Beach is highly impacted by coastal threats, such as coastal erosion, interrupted sediment transport due to creek channelization and upstream debris basins. Such threats have led to the decline of some native beach species and the loss of important ecosystem functions. Dunes and other beach habitats are critical in managing sand transport along the shoreline to create resilient beach morphologies, which can naturally adapt to the impacts of climate change. These systems can offer a nature-based adaptation approach, or living shoreline, as a form of protection for our coastlines. By restoring natural processes to the City's beaches, the Carpinteria Living Shoreline Project[1] aims to improve shoreline resiliency, protect landward development and infrastructure, and restore ecological functions as well as serve as a model for similar projects statewide. As currently proposed, the Mishopshno SMCA would interfere with the City's proposed Living Shoreline project and other beach maintenance, berm construction, and flood control projects. These projects are essential to preserve beach resources and to protect the City's infrastructure and private property from sea level rise and coastal flooding. We urge thorough consideration of existing City operations and maintenance activities within the proposed SMCA.

The Carpinteria City Beach is a popular public beach near an urban population center that has been and is currently used for a variety of different recreational activities. The City of Carpinteria is committed to working collaboratively towards the establishment of the Mishopshno SMCA, with careful consideration given to the concerns and priorities outlined above. As currently proposed, however, the Mishopshno SMCA is unnecessarily restrictive and should either be moved or modified to match all stakeholder interests and the practical realities of the area. Given the complexities of the proposal, we recommend the Mishopshno SMCA proposal be deferred to the California Department of Fish and Wildlife for further evaluation and public comment before final approval.

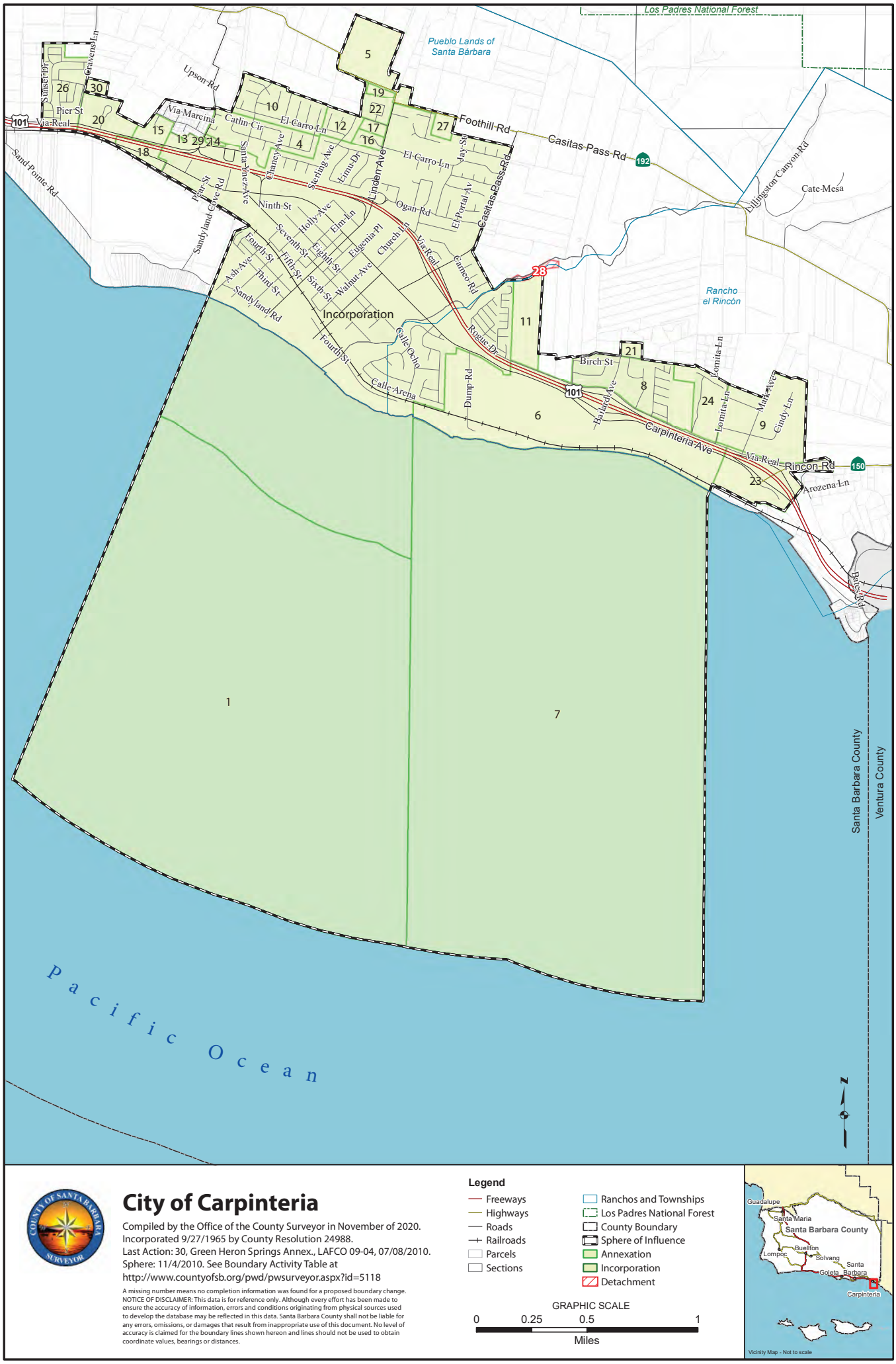
We look forward to continued engagement in this process to ensure the successful conservation and sustainable management of our coastal marine resources. Thank you for considering our comments and for your dedication to the protection of our natural environment. Please contact me if you have any questions at [redacted]

Sincerely,

Erin Maker
Environmental Program Manager

[1] Carpinteria Living Shoreline Project: https://carpinteriaca.gov/public-works/engineering-division/living-shoreline/

cc: Michael Ramirez, City Manager
John Ilasin, Public Works Director
Nick Bobroff, Community Development Director



City of Carpinteria

Compiled by the Office of the County Surveyor in November of 2020.
Incorporated 9/27/1965 by County Resolution 24988.
Last Action: 30, Green Heron Springs Annex., LAFCO 09-04, 07/08/2010.
Sphere: 11/4/2010. See Boundary Activity Table at
http://www.countyofsb.org/pwd/pwsurveyor.aspx?id=5118

A missing number means no completion information was found for a proposed boundary change.
NOTICE OF DISCLAIMER: This data is for reference only. Although every effort has been made to ensure the accuracy of information, errors and conditions originating from physical sources used to develop the database may be reflected in this data. Santa Barbara County shall not be liable for any errors, omissions, or damages that result from inappropriate use of this document. No level of accuracy is claimed for the boundary lines shown hereon and lines should not be used to obtain coordinate values, bearings or distances.

Legend

- Freeways
- Highways
- Roads
- Railroads
- Parcels
- Sections
- Ranchos and Townships
- Los Padres National Forest
- County Boundary
- Sphere of Influence
- Annexation
- Incorporation
- Detachment

GRAPHIC SCALE
0 0.25 0.5 1
Miles

From: Aubrie Fowler <[redacted]>
Sent: Wednesday, January 31, 2024 5:12 PM
To: FGC <FGC@fgc.ca.gov>; Ashcraft, Susan@FGC <[redacted]>
Cc: Calla Allison <[redacted]>; Claire Arre <[redacted]>; Jamie Blatter <[redacted]>
Subject: FGC Meeting Binder Submission

Hi Susan and Commission staff,

Please see the attached exhibit (saved as a PDF and Excel sheet, whichever formatting is preferred) to please be added to the meeting binder for the February Fish and Game Commission meeting on 2/14-2/15/2024.

The link to the Google sheet can be found **here** as well; this was the format that the MPA Collaborative Vetted Regulation Recommendations was previously shared with Commission and Department staff.

Please let me know if there's more context you need from me.

Thank you,
Aubrie

Aubrie Fowler (she/her)
South Coast Specialist
MPA Collaborative Network
cell: [redacted]
Sign-up for our Quarterly Newsletter
Find and join your local Collaborative

County	MPA	Current Regs Summarized	Compliance concerns and/or management problem identified	Regulation Recommendation for Adaptive Management	Consensus?	Justification	Supporting Management Suggestion	Petitioner Lead	Contact Information	Recommendation Category	Designation Change?
Del Norte	Pyramid Point SMCA	Rec take of surf smelt by dip net or Hawaiian type throw net. Tolowa Dee-ni' exempt	Onshore and offshore hook and line fishing, collecting sand crabs as bait, kayak fishers, violations from boaters registered in both CA and OR	Remove allowance for surf smelt by dip net or Hawaiian type throw net; Change to No-Take SMCA with Tribal exemption for Tolowa Dee-ni'	Yes	Smelt is culturally important species to Tolowa and No Take designation will be clearer to public, reducing violations	Signs being vandalized, ripped out. Outreach to gain compliance needed (Guardian Watchmen)	Tolowa Dee-ni' Nation	rosa.laucci@tolowa.com	Take Allowance Change	Yes, from SMCA to No-Take SMCA with Tribal exemption
Del Norte	Pyramid Point SMCA	Rec take of surf smelt by dip net or Hawaiian type throw net. Tolowa Dee-ni' exempt	Elk Valley Rancheria is interested in exploring the possibility of being included in exempt status	Add Elk Valley Rancheria to exempt Tribes if requested by Tribal Council	Yes	Elk Valley Rancheria has ancestral ties to the area				Take Allowance Change	
Del Norte	Pyramid Point SMCA	Rec take of surf smelt by dip net or Hawaiian type throw net. Tolowa Dee-ni' exempt	Boundary is in Oregon	Change northern boundary to align with recognized California/Oregon state line	Yes	Original boundary used a mapping system that does not align with on-the-ground state line.		Tolowa Dee-ni' Nation	rosa.laucci@tolowa.com	Boundary Change	
Del Norte	Point St. George Offshore Reef SMCA	Rec take of salmon by trolling and Dungeness crab by trap. Commercial take of salmon with troll fishing gear and Dungeness crab by trap. Elk Valley and Tolowa Dee-ni' exempt		No change	Yes						
Del Norte	Sea Lion Rock Special Closure	300'	No data	No change	Yes						
Del Norte	Castle Rock Special Closure	300'	Poke poling at Preston Island and Battery Point and Hook Finger Point during extremely low tides. Kayaks near closure	No change	Yes						
Del Norte	False Klamath Rock Special Closure	300' from 3/1-8/31	Low flyovers by US Coast Guard helicopter. Kayaks near closure, kaking kelp. Dogs off leash	No change	Yes		Signs needed at Wilson Creek. Potential site for CoastSnap to crowdsource changes around rock				
Humboldt	Reading Rock SMCA	Rec take of salmon by trolling; surf smelt by dip net or Hawaiian type throw net; Dungeness crab by trap, hoop net or hand. Commercial take of salmon with troll fishing gear; surf smelt by dip net; Dungeness crab by trap. Trinidad, Resighini and Yurok exempt	Hook and line fishing and take of sand crabs regularly occur, especially at southern boundary Gold Bluffs beach traditional smelt camp Track amount of surf smelt taken (25 lbs current limit). Hawaiian Type throw net inappropriate	Work with California Tribes and indigenous people to change “Hawaiian type throw net” to a term that is more reflective of Indigenous Californian net based take methods	Yes	Reference to Hawaiian nets when indigenous terms exist for this take type is inappropriate and disrespectful	Monitor Surf smelt as a part of state monitoring plan.			Language Change	

Humboldt	Reading Rock SMCA	Rec take of salmon by trolling; surf smelt by dip net or Hawaiian type throw net; Dungeness crab by trap, hoop net or hand. Commercial take of salmon with troll fishing gear; surf smelt by dip net; Dungeness crab by trap. Trinidad, Resighini and Yurok exempt		Recommend implementing limits on commercial take of surf smelt	Yes	Culturally important species				Take Allowance Change	
Humboldt	Reading Rock SMR	No Take	Drifting commercial crab pots	No change	Yes						
Humboldt	Samoa SMCA	Rec take of salmon by trolling; surf smelt by dip net or Hawaiian type throw net; Dungeness crab by trap, hoop net or hand. Commercial take of salmon with troll fishing gear; surf smelt by dip net; Dungeness crab by trap. Wiyot exempt	Difficult to determine boundaries	Work with California Tribes and indigenous people to change “Hawaiian type throw net” to a term that is more reflective of Indigenous Californian net based take methods	Yes	Reference to Hawaiian nets when indigenous terms exist for this take type is inappropriate and disrespectful	Monitor recreational and commercial (through landing/block reports) take of salmon by troll and surf smelt by dip net and assess effect on population; Signs with you are here map at Mad River			Language Change	
Humboldt	South Humboldt Bay SMRMA	No Take except waterfowl may be taken. Wiyot exempt	Invasive grasses, loss of eelgrass, general threats to habitat. Non Tribal members clamming. Difficult to identify boundaries within South Humboldt Bay	Determine reason it does not extend to southern water’s edge and extend if no reason	Yes	Clearer for outreach purposes to say from southern end of bay to 2nd hunter pull out	Direct enforcement to look for unlawful clamming			Boundary Change	
Humboldt	Sugarloaf Island Special Closure	300’		No change	Yes						
Humboldt	South Cape Mendocino SMR	No Take	Minimal patrol	No change	Yes		Develop a plan for evaluating remote area MPAs to determine impact, such as temporary M2 radar/drone surveillance; support southern Humboldt patrol by LED				
Humboldt	Steamboat Rock Special Closure	300' 3/1-8/31	Confusion on when it is open to swim out to and when it is closed	No change	Yes		Sign that highlights special closure and closure dates				
Humboldt	Mattole Canyon SMR	No Take	Minimal patrol. Some commercial crab pots observed during USCG flyover	No change	Yes		Develop a plan for evaluating remote area MPAs to determine impact, such as temporary M2 radar/drone surveillance; support southern Humboldt patrol by law enforcement division				
Humboldt	Sea Lion Gulch SMR	No Take	Backpackers harvest mussels along entire Lost Coast Trail; people getting too close to new elephant seal colony. No cell connectivity to determine boundaries of MPA	Move southern boundary south to Cooskie Creek	BLM support but need fisher input	Creek is more identifiable feature for land based outreach to fishers hiking the Lost Coast Trail				Boundary Change	

Humboldt	Big Flat SMCA	Rec take of salmon by trolling and Dungeness crab by trap, hoop net or hand. Commercial take of salmon with troll fishing gear and Dungeness crab by trap. Multiple Tribes exempt	Backpackers harvest mussels along entire Lost Coast Trail; surf fishing occurs at Miller Flat. No cell connectivity to determine boundaries of MPA	No change	Yes		More outreach needed for fishers hiking lost coast. Include more detailed information in BLM Lost Coast map				
Mendocino	Double Cone Rock SMCA	Rec take of salmon by trolling; Dungeness crab by trap, hoop net or hand. Commercial take of salmon with troll fishing gear and Dungeness crab by trap	Unknown. Limited patrol. Report of excessive urchin and need for grazer suppression.	Reassess restoration policy in SMCAs impacted by climate change/kelp loss	Yes	Loss of kelp habitat needs to be addressed in this SMCA	Allow for restoration work/grazer suppression to address urchin barrens (reds and purples)	California Sea Urchin Commission - allow for commercial take of urchin		Other	
Mendocino	Vizcaino Rock Special Closure	300' 3/1-8/31		No change	Yes						
Mendocino	Ten Mile SMR	No Take	Primary concern is shore-based fishing (rod and reel at seaside creek beach). Recreational fishers take rockfish and lingcod, crab pots "walk themselves" into MPA at southern boundary. Dogs off leash	No change	Yes		OK/boundary sign needed at northern boundary. Simplify outreach language around MPA clusters				
Mendocino	Ten Mile Beach SMCA	Rec take of Dungeness crab by trap, hoop net or hand. Commercial take of Dungeness crab by trap. Many Tribes exempt	Unlawful take of fish (rockfish, lingcod); dogs off leash in snowy plover habitat. Potential sand dump site south side of Ten Mile Beach	No change	Yes		Simplify outreach language around MPA clusters				
Mendocino	Ten Mile Estuary SMCA	Waterfowl may be taken. Many Tribes exempt	Limited access for fishers	No change	Yes		Simplify outreach language around MPA clusters				
Mendocino	MacKerricher SMCA	All rec take allowed. Commercial take allowed except for bull kelp and giant kelp	Multiple violations occur daily since closest to Fort Bragg city center (general fish and game code violations). North boundary (Laguna Point) hotspot for intertidal take	Add protection for intertidal zone, per State Parks, in support for protection of the resource and ease of enforcement/outreach	Many in support but no full consensus	There are limited areas in the county to lawfully take intertidal animals such as mussels, turban snails, limpets, etc.	More enforcement support needed due to limited State Parks personnel. Focus on tidepool education. Intertidal specific take signs are needed	State Parks pending review		Take Allowance Change	
Mendocino	Point Cabrillo SMR	No Take	Lighthouse sees lots of boats fishing offshore of Frolic Cove on northern end of Point Cabrillo SMR or inside	No change	Yes		OK boundary signs would be beneficial on both boundaries for kayak fishing				
Mendocino	Russian Gulch SMCA	All rec take allowed. Commercial take allowed except for bull kelp and giant kelp	General fish and game code violations	No change	Yes						

Mendocino	Big River Estuary SMCA	Rec take of surfperch by hook and line from shore only and Dungeness crab by hoop net or hand. Many Tribes exempt. Waterfowl may be taken	Increased use for swimming and recreation has led to safety concerns, including close calls between swimmers and hunters. Swimmers mixing with motorized boats may lead to accidents	Hunting should be prohibited due to high public use/public safety issues, per State Parks	Yes	Community reported incidents of near misses between hunters/boaters and swimmers		State Parks pending review		Allowed Activity Change	
Mendocino	Big River Estuary SMCA	Rec take of surfperch by hook and line from shore only and Dungeness crab by hoop net or hand. Many Tribes exempt. Waterfowl may be taken	Can MPA restrict motorized vessels if not ecological reserve?	Restrict all motorized vessels with allowance for public safety, per State Parks	Yes, with clarification that motorized vessels are only restricted going east (up river)	West access from launch should be allowed for boaters going out to ocean	Data on crab fishery is needed to determine whether allowance is sustainable. Need clear signage restricting snare traps. Pick up after dog signs needed	State Parks pending review		Allowed Activity Change	
Mendocino	Van Damme SMCA	All rec take allowed. Commercial take allowed except for bull kelp and giant kelp	Overtake and take of undersize fish	No change	Yes						
Mendocino	Navarro River Estuary SMCA	Rec take of salmonoids by hook and line. Many Tribes exempt. Waterfowl may be taken	People illegally breach sandbar (but outside MPA?)	No change	Yes						
Mendocino	Point Arena SMR	No Take	Fishing in SMR reported by lighthouse manager	No change	Yes		OK boundary signs needed				
Mendocino	Point Arena SMCA	Rec take of salmon by trolling. Commercial take of salmon with troll fishing gear		No change	Yes						
Mendocino	Sea Lion Cove	Rec and commercial take of finfish	Urchin barrens	Reassess restoration policy in SMCAs impacted by climate change/kelp loss	Yes		Allow for restoration work/grazer suppression to address urchin barrens (reds and purples)	California Sea Urchin Commission - allow for commercial take of urchin		Other	
Mendocino	Saunders Reef SMCA	Rec take of salmon by trolling. Commercial take of salmon with troll fishing gear and urchin	Citations issued for people diving and taking at Schooner Gulch; illegal shore fishing from Hearn Gulch	No change	Yes		Additional enforcement personnel/efforts are needed				
Sonoma	Del Mar Landing SMR	No Take	Fishing at north end	No change	Yes		Trail pamphlets with MPA information				
Sonoma	Stewarts Point SMR	No Take	Poaching at 3 mile line. Difficult for fishers to determine where 3 mile line is and difficult to enforce from land	Allow for trolling of salmon. Change to SMCA?	No. Discussed with no strong opposition but more info needed	Impact to commercial salmon fishing can be addressed with minimal impact to other resources	More signage needed at public access points			Take Allowance Change	Yes, would change SMR to SMCA. No consensus
Sonoma	Stewarts Point SMCA	Rec take from shore only of marine aquatic plants other than sea palm, marine invertebrates, finfish by hook and line, surf smelt by beach net, species authorized by hand-held dip net	Tribal based MPA	Prohibit all take and add Kashia Pomo to Tribal exemptions to make affirmative rights of Tribal Members re: collection, harvesting, and research	Yes	MPA is only accessed by Kashia Tribal members from shore (owned by Tribe) so would be same protection while acknowledging Tribal rights				Take Allowance Change	Yes, change from SMCA to No-Take SMCA with Tribal exemption

Sonoma	Salt Point SMCA	Recreational take of abalone and finfish allowed	Take of abalone during closure; poaching of intertidal species. Confusion regarding intertidal take	No change	Yes		Needs more signage on collecting/take of shellfish and other non finfish				
Sonoma	Gerstle Cove SMR	No Take	Excessive intertidal take. Rec fishers fishing the line	No change	Yes		Need for good tidepooler rules signs to address harmful tidepooling				
Sonoma	Russian River SMRMA	No take except waterfowl may be taken	Marine mammal disturbance occurring. County of Sonoma needs to conduct restoration work as part of management plan	Allow for restoration work in SMRMA	Yes	Restoration will not impact haul out sites, marine mammals or birds				Other	
Sonoma	Russian River SMCA	Rec take of Dungeness crab by trap, and surf smelt by hand-held dip net or beach net. Commercial take of Dungeness crab by trap	Illegal onshore and offshore fishing; seal disturbance "seal selfies" near Goat Rock. Trash/dogs off leash	No change	Yes		More outreach for out of town fishers/permanent signage				
Sonoma	Bodega Head SMR	No Take	Take of rockfish and trolling for salmon; fishing on northern boundary off rocks Difficult “fan” shape and hard to identify northern boundary makes enforcement difficult	No change	Yes	Would require new outreach					
Sonoma/Marin	Bodega Head SMCA	Rec take of pelagic finfish by trolling, Dungeness crab by trap, and market squid by hand-held dip net. Commercial take of pelagic finfish by troll fishing gear and round haul net, Dungeness crab by trap, and market squid by round haul net	Take of rockfish and trolling for salmon; fishing on northern boundary off rocks Difficult “fan” shape and hard to identify northern boundary makes enforcement difficult	No change	Yes						
Sonoma/Marin	Estero Americano SMRMA	No take except waterfowl may be taken	Confusion as to boundary “high tide line” and who manages strip of beach between ocean and estuary that is often closed; Difficulty identifying eastern boundary. No way to see boundary from shore	No change	Yes		More signs needed at access points here to address compliance concerns				
Marin	Estero de San Antonio SMRMA	No take except waterfowl may be taken	Some take (animal remains) and illegal fishing	No change	Yes						
Marin	Point Reyes SMR	No take	Sand dollar and fossil take, rod and reel fishing from vessels, party boats troll for salmon; violations are limited offshore	No change	Yes		Signage and more enforcement needed, especially at Drakes Beach and Coast Guard Station. Consolidated mixed messaging signs, with dog information.				

Marin	Point Reyes SMCA	Rec take of salmon by trolling and Dungeness crab by trap. Commercial take of salmon with troll fishing gear and Dungeness crab by trap	Commercial crabbers set coonstripe shrimp traps on top of crab traps; Boundaries in MPA cluster hard to identify; NPS jurisdiction limited to	No change	Yes						
Marin	Point Reyes Headlands Special Closure	No access from mean high tide line to a distance of 1000 feet seaward	Recreational vessels fishing in summer; Disturbance spiked in 2020; USFW continues to monitor this area	No change at this time	Yes	Might need to revisit making adjustments in the future if data shows changes/increases in disturbance					
Marin	Estero de Limantour SMR	No take	Difficult to determine boundary between SMR and Drakes Estero SMCA makes enforcement difficult. There are suspicions that poaching of clams occurs in the SMR from people on kayaks from Drakes Estero	Extend SMR designation all the way into Drakes Estero	Yes	NPS in support of expanding SMR because federally designated wilderness, major harbor seal haul out, and critical nursery habitat for leopard shark and bay rays		EAC Marin with NPS letter of support		Boundary Change	
Marin	Drakes Estero SMCA	The recreational take of clams is allowed	Difficult to determine boundary line between Drakes Estero SMCA and Estero de Limantour SMR leading to poaching. Cows accessing/pooping from NPS ranch leased land	Prohibit clamming in Drakes Estero SMCA. Merge with Estero de Limantour SMR.	Yes	SMCA designation was originally due to oyster farm that is no longer there. NPS in support of making into a SMR due to federally designated wilderness area	Give people direction/ outreach materials on where they CAN clam safely	EAC Marin with NPS letter of support		Take Allowance Change	Yes, change from SMCA to SMR
Marin	Point Resistance Rock Special Closure	No access from mean high tide line to a distance of 300 feet seaward of rock	Seabird flushing by vessels. USFW monitoring area.	No change	Yes	GFNMS thinks current regulations are good, very important to their mission and public outreach					
Marin	Double Point/Stormy Stack Special Closure	No access from mean high tide line to a distance of 300 feet seaward of rock	Seabird flushing by vessels and surfers, who enter harbor seal rookery. Increased visitation due to people hiking to Alamere Falls	No change	Yes	GFNMS thinks current regulations are good, very important to their mission and public outreach and don't want to extend to shore to allow shore access	Put signs with regulations and text about importance of special closure at trailhead; more outreach to boaters about special closures needed				

Marin	Duxbury Reef SMCA	Recreational take of finfish from shore and abalone* is allowed	Difficult to enforce and outreach about why you can take finfish but not invertebrates. Beach Watch data at this site for 30 years show slight decrease in activities in last 10 years, but take of invertebrates has been observed, and the Greater Farallones National Marine Sanctuary Superintendent has provided information about the need to consider additional conservation measures at Duxbury Reef. Maria Brown (NMS) submitted a letter saying Duxbury Reef would benefit from increased protection of unique and important habitat of entire reef (largest shale reef in N. America). EAC MPA Watch data shows	Change to SMR because of difficulty of interpretation and enforcement. Extend southern boundary further out to sea (south) and northern boundary to Double Point to fully cover reef	No	No agreement on extending boundaries to cover the reef and changing to SMR. More research needed on benefits of changing existing ribbon from SMCA to SMR; Might be important fishing access point for public	More signs needed and more support for onsite education and enforcement from CDFW to agate beach and land-side terrestrial Duxbury	EAC Marin		Take Allowance Change	Yes, would change SMCA to SMR. No consensus
Marin	Duxbury Reef SMCA	Recreational take of finfish from shore and abalone* is allowed	Heavy use and impacts, intertidal take – buckets and tools (e.g., crow bars, tire jacks) used to take black turban snails and purple urchin that are nestled into cracks. People need to break the reef to get to purple urchin	Potential compromise would be to add specific tidepool protections, similar to OC	TBD	NMS would like to continue conversation to explore potential compromises	Research other tidepool docent programs in MPAs with mixed use of allowed fishing/tidepool protections			Language Change	
San Francisco	North Farallon Islands SMR	No Take	Commercial crab case here	No change	Yes	More data needed for this MPA cluster	Increase CDFW LED patrols during peak months. Need for CCFRP program here				
San Francisco	North Farallon Islands Special Closure	No vessel shall be operated or anchored at any time from the mean high tide line to a distance of 1000 feet seaward of the mean lower low tide line of any shoreline of North Farallon Island, or to a distance of 300 feet seaward of the mean lower low tide line of any shoreline of the remaining three southern islets		No change	Yes						

San Francisco	Southeast Farallon Islands SMR	No Take	Small recreational boats. A number of encroachments occur into SMR during better weather months	No change	Yes		Increase patrols from LED and consider M2 radar at this location				
San Francisco	Southeast Farallon Islands SMCA	Recreational take of salmon by trolling and commercial take of salmon by troll fishing gear	Salmon fishers use salmon gear to fish for halibut	No change	Yes						
San Francisco	Southeast Farallon Islands Special Closure	Closed 300 feet seaward year-round, except Fisherman's Bay to East Landing, southeastern tip of the island and southeastern side of Saddle (Seal) Rock, which is closed from December 1 through September 14. 5 mile per hour speed limit 1000 ft seaward of mean lower low tide of any shoreline Exhaust system requirements for commercial dive boats	Boats cut across the special closure	No change	Yes	Predates MLPA process, careful consideration went into crafting special closure regulations					
San Mateo	Egg (Devil's Slide) Rock to Devil's Slide Special Closure	A special closure is designated from the mean high tide line to a distance of 300 feet seaward of the mean lower low tide line of any shoreline of any of the three rocks comprising Egg (Devil's Slide) Rock; Transit in between the rock and the mainland between these points is prohibited at any time.	Reported violations include fishing boats inside boundaries and low flying aircraft/drones	Change name to "Devil's Slide Special Closure"	Yes	Egg rock is no longer a name used/recognized locally. Devil's Slide is more appropriate and simpler for outreach				Language Change	
San Mateo	Montara SMR	No Take	A top cited MPA in Central Coast, highest in San Mateo; fishing offshore and tidepool take; Difficulty interpreting southern boundary	Move Montara SMR onshore southern boundary to current Pillar Point SMCA southern boundary (north end of Maverick's Beach), then extending out to current offshore southern SMR boundary point	Yes	Easier for enforcement and makes SMR boundaries consistent with Fitzgerald Marine Reserve boundaries				Boundary Change	

San Mateo	Pillar Point SMCA	The recreational take of pelagic finfish by trolling, Dungeness crab by trap, and market squid by hand-held dip net is allowed. The commercial take of pelagic finfish by troll or round haul net Dungeness crab by trap, and market squid by round haul net is allowed.	Unclear boundary leads to poaching in intertidal Difficult for local law enforcement to ensure compliance of tidepool take regulations due to high volume of consumptive visitors	Extend southern SMCA boundary further south to edge of harbor jetty, extending out to existing offshore southern point. Onshore northern boundary would be same as Montara SMR onshore southern boundary	Yes	Would cover entire reef in MPA for ease of allied agency outreach and enforcement.				Boundary Change	
San Mateo	Pillar Point SMCA	The recreational take of pelagic finfish by trolling, Dungeness crab by trap, and market squid by hand-held dip net is allowed. The commercial take of pelagic finfish by troll or round haul net Dungeness crab by trap, and market squid by round haul net is allowed.		Change regulations to allow for recreational hook and line take of finfish from shore and take of mussels, crabs, snails and seaweeds for equity and access purposes	Yes	Allowing for shore based hook and line and some intertidal take maintains access for consumptive users while applying some protection for a heavily impacted habitat				Take Allowance Change	
San Mateo/Santa Cruz	Año Nuevo SMR	No Take	Unlawful take of snails; fishing; wildlife disturbance. Boats driving squid out of MPA. Confusion because sign at top of trail to Greyhound Rock says fishing beach but must go left at bottom to legally fish	Move southern boundary line to have whole of Greyhound Rock in SMR	Yes, at both Santa Cruz and San Mateo Collaborative meetings	Clearer boundary makes enforcement easier	Ensure sign with map at bottom of trail. Utilize social/digital/traditional media for public outreach	State Parks pending review		Boundary Change	
San Mateo/Santa Cruz	Greyhound Rock SMCA	Rec take of giant kelp by hand harvest only, market squid, salmon. Other finfish by hook and line only from shore. Commercial take of giant kelp by hand harvest only, salmon and market squid	Take of mussels at southern boundary Confusion with Año Nuevo SMR boundary/whether fishing is allowed at Greyhound Rock Split between 2 counties	Move northern boundary line to have whole of Greyhound Rock outside of SMCA and in SMR; Move southern boundary south to beginning of Scott Creek bridge	Yes, at both Santa Cruz and San Mateo Collaborative meetings	Reef should be fully protected or fully open. Preference to cover reef but either way will have clearer boundary for outreach/enforcement. Move of southern boundary would cover reef to address intertidal impacts	Need for sign with map at Scotts Creek	State Parks pending review		Boundary Change	
San Mateo/Santa Cruz	Greyhound Rock SMCA	Rec take of giant kelp by hand harvest only, market squid, salmon. Other finfish by hook and line only from shore. Commercial take of giant kelp by hand harvest only, salmon and market squid	Confusing regulations	Replace comma with semi-colon in regulations after "giant kelp by hand harvest only", or otherwise edit	Yes	Clearer language needed to clarify you are not required to catch salmon and squid by hand harvest only		State Parks pending review		Language Change	Section 100 change
Santa Cruz	Natural Bridges SMR	No Take	Hard to identify boundaries; safety concerns with fishers and swimmers at Natural Bridges State Park beach	Shift both boundaries south to more identifiable features (4 mile point and Natural Bridge)	Yes	State Parks would like SMR to cover the beach at Natural Bridges SP for public safety reasons	Need for interpretive signs with maps/good tidepooler rules, why MPAs, etc.	State Parks pending review		Boundary Change	
Santa Cruz	Soquel Canyon SMCA	Rec and commercial take of pelagic finfish	Split between 2 counties	No change	Yes						

Monterey	Elkhorn Slough SMR	No Take	Fishing occurs regularly at Kirby Park pier/dock, was originally built for fishers with disabilities with SFRA grant. Inconsistent enforcement.	Move northern boundary south of Kirby Park pier/dock. Shift entire MPA to maintain size	Yes, at both Santa Cruz and Monterey Collaborative meetings	Opens fishing area as originally intended to limit poaching; supports increased enforcement presence in area	If Kirby is open, must be concerted cross-jurisdictional effort to enforce shore waste of fish/debris and other F&G Code violations. Need for good fishing practices outreach	Elkhorn Slough Foundation		Boundary Change	
Monterey	Elkhorn Slough SMCA	The recreational take of finfish by hook and line only and clams is allowed. Clams may only be taken on the north shore of the slough in the area adjacent to the Moss Landing State Wildlife Area [subsection 550(a)].	Difficult to determine where SMR/SMCA boundary is (i.e., where kayak fishers can no longer fish).	Move SMR line to bird watching platform (eastern side)	Yes, at both Santa Cruz and Monterey Collaborative meetings	Bird watching platform provides a clear boundary for shore and kayak fishers and would maintain size of SMR with shift off Kirby		Elkhorn Slough Foundation		Boundary Change	
Monterey	Elkhorn Slough SMCA	The recreational take of finfish by hook and line only and clams is allowed. Clams may only be taken on the north shore of the slough in the area adjacent to the Moss Landing State Wildlife Area [subsection 550(a)].	Clamming disturbs sea otter rafts. Huge amounts of trash (fishing receptacles full)	Removing allowance for clamming to address impact to otters and human health considerations	Maybe?	Need more info on impact to recreational clammers and safety of consuming clams	Need for more trash receptacles/removal	Elkhorn Slough Foundation		Take Allowance Change	
Monterey	Moro Cojo Slough State Marine Reserve	No take	Some access on eastern end. Agricultural influence. Elkhorn Slough NERR in support of no change	No change	Yes						
Monterey/Santa Cruz	Soquel Canyon State Marine Conservation Area	Recreational and commercial take of pelagic finfish is allowed	Many violations, especially illegally set crab traps (commercial) and rockfish take (recreational). Whale disturbance. More impact due to depth restrictions lifted	No change	Yes						
Monterey	Portuguese Ledge State Marine Conservation Area	Recreational and commercial take of pelagic finfish is allowed	Many violations, especially rockfish take (recreational). Whale disturbance	No change	Yes						
Monterey	Edward F. Ricketts State Marine Conservation Area	Recreational take of finfish by hook and line. Commercial take of giant kelp and bull kelp by hand	Fishing debris from Coast Guard pier. Abalone and other intertidal poaching at breakwater	Explore regulations to limit fishing gear loss from Coast Guard pier (such as requiring use of breakaway leaders or no braided line)	Yes	Fishing gear loss impacts wildlife, habitat, and safety of divers due to entanglement	Partner with MBNMS on outreach of litter/derelict fishing gear			Language Change	
Monterey	Edward F. Ricketts State Marine Conservation Area	Recreational take of finfish by hook and line. Commercial take of giant kelp and bull kelp by hand	New regulations may restrict fishing for rockfish from boat close to shore after October 1	Change to SMR and join with Lovers Point-Julia Platt SMR	Maybe	No strong opposition but no fishing reps present		Giant Giant Kelp Restoration Project (G2KR)		Take Allowance Change	Yes, would change from SMCA to SMR

Monterey	Edward F. Ricketts State Marine Conservation Area	Recreational take of finfish by hook and line. Commercial take of giant kelp and bull kelp by hand		Allow restoration/urchin culling without requiring SCP	No	May lead to destruction of healthy urchins		Giant Giant Kelp Restoration Project (G2KR) - applies to Ed Ricketts, PG Gardens, and Carmel Bay SMCAs, and will include suggestion for buoys on sites		Other	
Monterey	Lovers Point- Julia Platt State Marine Reserve	No Take	Fishing off Lovers Point rocks, undersize and immature fish, spearfishers and fishing boats catch halibut, illegal tidepool take; confusion around northern boundary line	Move southern boundary line so Lovers Point is either all in or all out (with preference for all in reserve)	No	Disagreement about where to move line	Boundary marker or fishing/no fishing arrow sign needed if boundary doesn't change			Boundary Change	
Monterey	Lovers Point- Julia Platt State Marine Reserve	No Take		Move southern boundary to end of Lovers Point, splitting point equally in half	Yes	Fishing/No fishing arrow signs would make sense/be more accurate	Fishing/no fishing arrow sign needed at Lovers Point			Boundary Change	
Monterey	Pacific Grove Marine Gardens State Marine Conservation Area	Recreational take of finfish. Commercial take of giant kelp and bull kelp by hand	Spearfishing violations, especially from kayaks and dinghies; illegal take of scallops and crustaceans; undersize and immature fish taken Point Pinos is key oystercatcher nesting habitat	Move both boundary lines so Lovers Point and Point Pinos are all out of SMCA and in SMRs because both are key oystercatcher nesting sites	No	Rock outcropping and buoy at Point Pinos (southern boundary) are currently good boundary indicators for boaters				Boundary Change	
Monterey	Pacific Grove Marine Gardens State Marine Conservation Area	Recreational take of finfish. Commercial take of giant kelp and bull kelp by hand		Move northern boundary to end of Lovers Point	Yes	Fishing/No fishing arrow signs would make sense/be more accurate	Fishing/no fishing arrow sign needed at Lovers Point and Point Pinos			Boundary Change	
Monterey	Pacific Grove Marine Gardens State Marine Conservation Area	Recreational take of finfish. Commercial take of giant kelp and bull kelp by hand	New regulations may restrict fishing for rockfish from boat close to shore after October 1	Change to SMR, join with Lovers Point SMR	Maybe	No strong opposition but no fishing reps present		Giant Giant Kelp Restoration Project (G2KR)		Take Allowance Change	Yes, would change from SMCA to SMR
Monterey	Asilomar State Marine Reserve	No Take	Onshore and offshore fishing common, hook and line from nooks and crannies; harmful tidepooling, tidepool take; wildlife disturbance common Northern boundary at Point Pinos is confusing, splits rocks in half	No change	Yes		Fishing/No Fishing arrow signs needed at Point Pinos				
Monterey	Carmel Pinnacles State Marine Reserve	No Take	Offshore violations common	No change	Yes						
Monterey	Carmel Bay State Marine Conservation Area	Recreational take of finfish. Commercial take of giant kelp and bull kelp by hand	Intertidal take common, including abalone and mussels. Golf balls go into MPA and are not collected. Some kelp take at Stillwater Cove	No change	Yes		Work with Pebble Beach on reducing golf ball litter either through requiring biodegradable balls at key holes or ensuring balls are collected by divers				
Monterey	Point Lobos State Marine Reserve	No Take	Take occurs. Boundaries are confusing	No change	Yes						

Monterey	Point Lobos State Marine Reserve	No Take		Allow restoration/urchin culling	No	Difficult for enforcement/interpretation in no-take area		Giant Giant Kelp Restoration Project (G2KR)		Other	
Monterey	Point Lobos State Marine Conservation Area	Recreational take of salmon and albacore and the commercial take of salmon, albacore, and spot prawn is allowed		No change	Yes						
Monterey	Point Sur State Marine Reserve	No Take	Violations common between SMR and SMCA, southern corner is hard to enforce. Abalone case reported	Encompass the whole coastline of Point Sur in MPA	No	Keep boundaries as is				Boundary Change	
Monterey	Point Sur State Marine Conservation Area	Recreational and commercial take of salmon and albacore		Add bluefin tuna to list of species allowed for take	No	Lessens protection				Take Allowance Change	
Monterey	Big Creek State Marine Reserve	No Take	L-shape of SMR within SMCA is confusing	No change	Yes						
Monterey	Big Creek State Marine Conservation Area	Recreational take of salmon and albacore. Commercial take of salmon, albacore	Potential unlawful fishing off Marine Lab	No change	Yes						
San Luis Obispo	Piedras Blancas State Marine Reserve	No take	Missing signs. Onshore fishing violations (poaching mussels at Point Sierra Nevada). Wildlife disturbance. Extreme angle makes kayak fishers look like they are fishing in SMR	No change	Yes		Use boundary images on signs to help reference angle at pullout.				
San Luis Obispo	Piedras Blancas State Marine Conservation Area	Recreational and commercial take of salmon and albacore	Occasional poaching observed. Fishing for rockfish. No albacore, limited salmon observed by fishers/wardens	No change	Yes						
San Luis Obispo	Cambria State Marine Conservation Area	All recreational take is allowed	Harmful tidepooling occurring throughout MPA. Difficult to message good tidepooler rules without designated protections	Add tidepool protection language similar to Crystal Cove and Dana Point SMCAs	Yes	Would make it easier to message about responsible tidepooling and reduce inadvertent take	Tools for existing SP tidepool docent program needed here, such as Natural Bridges State Park tidepool cart	State Parks pending review; Environment California?		Take Allowance Change	
San Luis Obispo	Cambria State Marine Conservation Area	All recreational take is allowed	Boundary between Cambria SMCA and White Rock SMCA is confusing, leading to accidental poaching by kayak fishers putting in at boundary at Wedgewood	Shift White Rock SMCA northern boundary to end of neighborhood at Lampton Park. Shift southern boundary south 1/2 mile accordingly to not lose any protection and cover some kelp habitat	Yes	May be some pushback from commercial live rockfish fishery for southern shift but recreational anglers in support		Environment California?		Boundary Change	
San Luis Obispo	Cambria State Marine Conservation Area	All recreational take is allowed	No commercial take allowed but there is an existing kelp lease?	Remove kelp lease 209 OR clarify that lease holder cannot harvest within Cambria SMCA	Yes	Commercial harvest of kelp is incompatible with MPA regulations that allow recreational take only		Environment California?		Other	

San Luis Obispo	White Rock State Marine Conservation Area	Commercial take of giant kelp and bull kelp with valid lease	Boundary between Cambria SMCA and White Rock SMCA is confusing, leading to accidental poaching of kayak fishers putting in at boundary at Wedgewood	Shift White Rock SMCA northern boundary to end of neighborhood at Lampton Park. Shift southern boundary south 1/2 mile accordingly to not lose any protection	Yes	May be some pushback from commercial live rockfish fishery for southern shift but recreational anglers in support		Environment California?		Boundary Change	
San Luis Obispo	White Rock State Marine Conservation Area	Commercial take of giant kelp and bull kelp with valid lease		Prohibit commercial take of giant kelp and bull kelp with valid lease and change to an SMR	Yes	Original intent was a reserve but there was existing kelp lease. Current lease holder is fine with relinquishing/ disallowing take of kelp		Environment California?		Take Allowance Change	Yes, would change from SMCA to SMR
San Luis Obispo	Morro Bay State Marine Recreational Management Area	Waterfowl hunting allowed. Recreational take of finfish north of line at Pasadena Point. Aquaculture allowed	Poaching occurs at southern side that does not allow take of finfish. Line is confusing and unclear on maps and outreach materials. Illegal invertebrate take (e.g., sea stars at jetty, ghost shrimp at Windy Cove). Signs needed at blue pier	Shift no fishing boundary 150 yds north to public access at Pasadena Park (between Santa Ysabel and Baywood Way)	Yes	Makes it easier for county to manage and educate more accurately about fishing/no fishing line	Signs needed, especially at Blue Pier. County can install sign at Pasadena Park			Boundary Change	
San Luis Obispo	Morro Bay State Marine Recreational Management Area	Waterfowl hunting allowed. Recreational take of finfish north of line at Pasadena Point. Aquaculture allowed	Hunting "within" a bird sanctuary (City of Morro Bay) is confusing, safety concerns for paddlers with increased visitors who are unaware hunting is allowed. Concern about safety issues around hunting around neighborhoods. Trampling of plants occur on shoreline in Baywood Park.	No change to regulations at this time	Yes	Important hunting area. Confusion should be addressed through outreach	Overlay hunting map on SMRMA for outreach purposes Mixed message signs/more education needed about estuary impacts/erosion: "tread lightly" in Los Osos				
San Luis Obispo	Morro Bay State Marine Reserve	No Take	Some hunting violations, hugging line; Boardwalks work to protect birds! Might be good to have one at Baywood Park at 1st Street	No change (reluctantly)	Yes	Some desire to extend SMR west and into bottom part of bay beneath Baywood Peninsula but do not want to impede on aquaculture	More education and outreach needed				
San Luis Obispo	Point Buchon State Marine Reserve	No Take	Regular poaching offshore, trolling, and stopping to drop a line in water. Busiest MPA in SLO, most violations observed/cited	Move northern boundary to actual Point Buchon	Yes	Clearer boundary for fishers coming from Port San Luis	Boundary marker needed here. Make "flagpole" more visible (hang flag?) if boundary doesn't change	State Parks pending review		Boundary Change	
San Luis Obispo	Point Buchon State Marine Conservation Area	Recreational and commercial take of salmon and albacore allowed	Regular poaching, rockfish and lingcod, maybe some squid boats?	No change	Yes						

Santa Barbara and Ventura (Santa Barbara Channel)	Vandenberg SMR	No Take	Vandenberg Space Force Base (VSFB) allows active-duty officers, their dependents/families, and guests to fish off Vandenberg. Leads to confusion since officially a no-take area. Regulations should match take allowed. Petition has been submitted by City of Lompoc to allow shore fishing at Surf Beach	Change designation to SMCA that allows hook and line for finfish from shore only	Yes	Would increase actual protection due to past 5 Base Commanders' decision to allow all legal take on base and would address equity concerns by allowing access for non-military at Surf Beach		Greg Helms to propose intertidal ribbon		Take Allowance Change	Yes, would change from SMR to SMCA
Santa Barbara and Ventura (Santa Barbara Channel)	Vandenberg SMR	No Take		Revaluate MOA with VSFB that is being interpreted as allowing for full military recreational take in a no-take SMR	No, not needed if designation is changed to SMCA	Vandenberg conservation officer will enforce updated take regs on military personnel				Other	
Santa Barbara and Ventura (Santa Barbara Channel)	Point Conception SMR	No Take	Recent groundfish case. Difficult for enforcement to access from land through Dangermond Preserve. M2 radar at Pt. Conception shows a lot of boating activity, may	No change	Yes		Provide continued support for M2 radar with ground truthing and continued coordination/info sharing between agencies				
Santa Barbara and Ventura (Santa Barbara Channel)	Kashtayit SMCA	Rec take of finfish, invertebrates (except rock scallops and mussels) and giant kelp by hand harvest. Santa Ynez band of Chumash exempt	Illegal and dangerous access down the bluffs on Gaviota. Fishing without a license. Access issues for pier fishers with Gaviota pier closed. Difficult to interpret	Reword regulations for clarity of outreach: "Recreational take of finfish, invertebrates, and giant kelp allowed"	Yes	Simpler regulations will make outreach easier, increasing compliance, with minimal impacts to the resources	Have FGC/State push for pier repair at Gaviota Pier (SB County/State Parks) for safety/access reasons	State Parks pending review/Greg Helms		Language Change	Section 100 change
Santa Barbara and Ventura (Santa Barbara Channel)	Naples SMCA	Rec take by spearfishing of white seabass and pelagic finfish. Commercial take of giant kelp by hand or mechanical harvest. Santa Ynez Band of Chumash exempt	Hook and line fishing and access issues occur here, and most days there are at least two vehicles for fishing or surfing parked near Naples. Impact to hook and line fishers	Add hook and line to allowed method of take	No	Numbers/impact/level of take different between hook and line and spearfishing. Would drastically reduce protection				Take Allowance Change	
Santa Barbara and Ventura (Santa Barbara Channel)	Campus Point No-Take SMCA	No Take	Onshore and offshore hook and line fishing continues to be observed	Change purple to red for outreach purposes	Yes	Easier to explain "no take" if consistent with red SMR		Greg Helms		Other	
Santa Barbara and Ventura (Santa Barbara Channel)	Goleta Slough No-Take SMCA	No Take	Trespassing (e.g., illegal swimming, dogs). People occasionally use nets to fish here and/or fish off bridges at the finger boundaries of the slough. Dumping of sediment still occurs in Goleta Bay	Consider water quality designation for Goleta Bay	Yes	Goleta Bay is between two MPAs and there is a need to address impacts of sediment dumping to subsistence fishers off Goleta Pier		Greg Helms		Other	
Santa Barbara and Ventura (Santa Barbara Channel)	Goleta Slough No-Take SMCA	No Take		Change purple to red for outreach purposes	Yes	Easier to explain "no take" if consistent with red SMR		Greg Helms		Other	

Santa Barbara and Ventura (Santa Barbara Channel)	Richardson Rock SFMR	No Take		No change	Yes						
Santa Barbara and Ventura (Santa Barbara Channel)	San Miguel Island Special Closure	Allowance for sea urchin divers between Castle Rock and Judith Rock SMR western boundary (Point Bennet) between 3/15-4/30 and 10/1-12/15.	Commercial urchin poaching. Purpose to reduce disturbance to pinniped populations. Is closure still necessary? Point Bennet has one of the largest pinniped (six species) rookeries on the West Coast of North America	Revaluate need for special closure (SC); Clean up language to address confusion between 300 yards describing SC and 100 yards keeping boats from whole Island 102 A.1.(a)	Yes		M2 radar at NMFS marine mammal station	Greg Helms		Language Change	
Santa Barbara and Ventura (Santa Barbara Channel)	Harris Point SFMR	No Take	CDFW sees some fishers that are taking from shore, although it is not common	No change	Yes		Use land-based range markers (e.g., O & K) to mark boundaries				
Santa Barbara and Ventura (Santa Barbara Channel)	Judith Rock SFMR	No Take		No change	Yes		Use land-based range markers (e.g., O & K) to mark boundaries				
Santa Barbara and Ventura (Santa Barbara Channel)	Carrington Point SMR	No Take	Confusing angle relative to pier	No change	Yes	NPS outreach on angle has been good	More permanent boundary markers/signage is needed				
Santa Barbara and Ventura (Santa Barbara Channel)	Skunk Point SMR	No Take	Difficult to determine how far offshore boats are (in or out)	No change	Yes						
Santa Barbara and Ventura (Santa Barbara Channel)	South Point SFMR	No Take		No change	Yes						
Santa Barbara and Ventura (Santa Barbara Channel)	Painted Cave SMCA	Rec take of spiny lobster and pelagic finfish	People are taking non-pelagic fish species, rockfish, California sheephead, and live fish	No change	Yes						
Santa Barbara and Ventura (Santa Barbara Channel)	Gull Island SFMR	No Take		Have state discuss with NMS changing federal area to FMCA to allow for take of pelagics	No	More data/justification needed				Take Allowance Change	Yes, would turn federal MRs into federal MCAs. No consensus
Santa Barbara and Ventura (Santa Barbara Channel)	Scorpion SFMR	No Take	Fishing/take in little coves at eastern boundaries. Lobster traps	No change	Yes		More on-island enforcement presence needed				
Santa Barbara and Ventura (Santa Barbara Channel)	Anacapa Island Special Closure	No net or trap may be used in waters less than 20 feet deep. Brown Pelican closure from Portuguese Rock to Frenchy's Cove 1/1-10/31	Brown pelican area makes it difficult for Island Packers and others to land legally at Frenchy's	Add exemption to allow access/landing Frenchy's Cove	Yes	Intent was to allow landing at Frenchy's Cove but aligning brown pelican closure with SMR/SMCA boundary closed off access to safe landing		Greg Helms		Allowed Activity Change	
Santa Barbara and Ventura (Santa Barbara Channel)	Anacapa Island Special Closure	No net or trap may be used in waters less than 20 feet deep. Brown Pelican closure from Portuguese Rock to Frenchy's Cove 1/1-10/32	Depth hard to enforce due to sheer drop off from island	Reassess need for Special Closure and consider removing if not justified	Yes	May only need brown pelican closure rather than full island special closure to protect seabirds		Greg Helms		Allowed Activity Change	Yes, would remove special closure

Santa Barbara and Ventura (Santa Barbara Channel)	Anacapa Island SFMCA	Rec take of spiny lobster and pelagic finfish. Commercial take of spiny lobster. Santa Ynez Band of Chumash exempt	Confusion regarding what "pelagic" means may lead to unlawful take	No change	Yes		Outreach needed around pelagics				
Santa Barbara and Ventura (Santa Barbara Channel)	Anacapa Island SFMR	No Take	Violations for unlawful take	No change	Yes						
Santa Barbara and Ventura (Santa Barbara Channel)	Footprint SFMR	No Take	Lots of violations. Boats drift in because they cannot anchor	Have state discuss with NMS changing federal area to FMCA to allow for take of pelagics	No	More data/justification needed				Take Allowance Change	Yes, would turn federal MRs into federal MCAs. No consensus
Santa Barbara and Ventura (Santa Barbara Channel)	Begg Rock SMR	No Take	The MPA violations here are commercial and come from experienced	No change	Yes						
Santa Barbara and Ventura (Santa Barbara Channel)	Santa Barbara Island SFMR	No Take	Osborne Bank. CPFV/commercial lobster poaching. Overlapping jurisdictions	Have state discuss with NMS changing federal area to FMCA to allow for take of pelagics	No	More data/justification needed	M2 radar needed to monitor remote MPA			Take Allowance Change	Yes, would turn federal MRs into federal MCAs. No consensus
Los Angeles (Mainland)	Point Dume SMCA	Rec take by spearfishing of white seabass and pelagic finfish. Commercial take of swordfish by harpoon and coastal pelagic species by round haul net, brail gear, and light boat. Santa Ynez band exempt	Frequent noncompliance with MPAs and limited enforcement	Delete allowance for commercial take of Swordfish by harpoon	Yes	Swordfish fishing does not occur that close to shore	Additional enforcement personnel/efforts are needed	State Parks pending review; Heal the Bay		Take Allowance Change	
Los Angeles (Mainland)	Point Dume SMCA	Rec take by spearfishing of white seabass and pelagic finfish. Commercial take of swordfish by harpoon and coastal pelagic species by round haul net, brail gear, and light boat. Santa Ynez band exempt		Allow hook and line fishing for allowed method of take of white seabass and pelagic finfish	No	Lessening of protection/unclear impacts				Take Allowance Change	
Los Angeles (Mainland)	Point Dume SMR	No Take	Angle of eastern boundary is confusing/extends due west and is close to shore	No change	Yes		Use of surveyed boundary images in outreach can help address confusion with eastern boundary at Paradise Cove				
Los Angeles (Mainland)	Point Vicente No-Take SMCA	No Take	Frequent noncompliance with MPAs and limited enforcement	No change	Yes		Additional enforcement personnel/efforts are needed				
Los Angeles (Mainland)	Point Vicente No-Take SMCA	No Take	Confusion of significance of purple designation	Keep allowance for maintenance but change color from purple to red for ease of public interpretation	Yes	Easier to explain "no take" if consistent with red SMR				Other	

Los Angeles (Mainland)	Abalone Cove SMCA	Rec take by spearfishing of white seabass and pelagic finfish; and market squid by hand-held dip net. Commercial take of swordfish by harpoon and coastal pelagic species by round haul net, brail gear, and light boat	Harmful tidepooling impacts/take from tidepools. Frequent noncompliance with MPAs and limited enforcement	Delete allowance for commercial take of swordfish by harpoon	Yes	Swordfish fishing does not occur that close to shore	Additional enforcement personnel/efforts are needed	Heal the Bay		Take Allowance Change	
Los Angeles (Mainland)	Abalone Cove SMCA	Rec take by spearfishing of white seabass and pelagic finfish; and market squid by hand-held dip net. Commercial take of swordfish by harpoon and coastal pelagic species by round haul net, brail gear, and light boat		Allow hook and line fishing for allowed method of take of white seabass and pelagic finfish	No	Lessening of protection/unclear impacts				Take Allowance Change	
Los Angeles (Catalina Island)	Arrow Point to Lion Head Point SMCA	All rec and commercial take allowed. Take of invertebrates prohibited	Poaching lobster and abalone. Hoop nets. Difficult to identify 1,000 feet from shore at Indian/Endemic Rock	No change	Yes		Need for a locally managed (research) buoy to mark 1,000 feet point				
Los Angeles (Catalina Island)	Blue Cavern Onshore No-Take SMCA	No Take. No anchor area in original refuge boundaries	Fishing/using hoop nets close to shore at Big Fisherman Cove. Poaching at Yellowtail Point and Bird Rock; Confusion around no anchor zone	Change purple to red for outreach purposes	Yes, only if all current maintenance/access activities are still allowed	Easier to explain "no take" if consistent with red SMR	Need for some boundary marker at Yellowtail Point. MPA Watch transect would help identify use/ compliance issues here			Other	
Los Angeles (Catalina Island)	Blue Cavern Offshore SMCA	Rec take of pelagic finfish by hook and line and spearfishing and white seabass by spearfishing and market squid by hand held dip net. Commercial take of pelagic finfish by hook and line and swordfish by harpoon	Take via illegal gear types	No change	Yes						
Los Angeles (Catalina Island)	Long Point SMR	No Take	Trolling through MPA occurs. Misconception that MPA is only close to shore. Rental boats go past Long Point and fish	Make a distance from shore rather than lat/long for ease of outreach. Cut off corner and flip and move west (offshore) to maintain size	Yes	Clearer outreach to trollers to stay certain distance from shore, IF maintains size				Boundary Change	
Los Angeles (Catalina Island)	Lover's Cove SMCA	Rec take by hook and line from the Cabrillo Mole is allowed. Feeding fish allowed	Fishing from shore at the ramp near the Mole. Angle is difficult at eastern boundary. Food torpedoes are shot from tourist subs to attract fish to windows	Remove allowance for feeding of fish	Yes	Against intent of MLPA, affecting behavior of fish/habitat; public safety issue as fish become more aggressive and bite				Allowed Activity Change	
Los Angeles (Catalina Island)	Casino Point No-Take SMCA	No Take. Feeding fish allowed	Boundaries don't match dive park buoys. Feeding fish may be incompatible use. 40-50' depth at MPA line.	Remove allowance for feeding of fish.	Yes	Against intent of MLPA, affecting behavior of fish/habitat; public safety issue as fish become more aggressive and bite	Might need to utilize a weaning off process for fish used to being fed			Allowed Activity Change	

Los Angeles (Catalina Island)	Casino Point No-Take SMCA	No Take. Feeding fish allowed		Change purple to red for outreach purposes for outreach	Yes	Easier to explain "no take" if consistent with red SMR				Other	
Los Angeles (Catalina Island)	Farnsworth Onshore SMCA	Rec take by spearfishing of white seabass and pelagic finfish; marline, tunas and dorado by trolling and market squid by hand held dip net. Commercial take of swordfish by harpoon, coastal pelagics by roundhaul net, brail gear and light boat	More difficult to assess whether poaching is occurring on the backside. Challenging/confusing for fishers	No change	Yes		More outreach to fishers needed on why deep habitat/fish are protected here				
Los Angeles (Catalina Island)	Farnsworth Offshore SMCA	Rec take of pelagic finfish by hook and line or by spearfishing; white seabass by spearfishing; marlin, tunas and dorado by trolling and market squid by hand held dip net. Commercial take of swordfish by harpoon, coastal pelagics by roundhaul net, brail gear and light boat	CPFVs (party boats) are seen illegally fishing in Farnsworth Offshore SMCA, moving out if they see the CDFW patrol boat approaching. Regs restricting take of rockfish can be confusing for fishers/challenging to prove rockfish on board was taken outside	No change	Yes						
Los Angeles (Catalina Island)	Cat Harbor SMCA	Rec take of finfish by hook and line or by spearfishing, market squid by hook and line, and spiny lobster and sea urchin. Commercial take of sea cucumbers by diving only and spiny lobster and sea urchin. Aquaculture of finfish	Some take of undersized fish	No change	Yes						
Orange	Bolsa Bay SMCA	Rec take of finfish by hook and line from shore in designated areas only	Confusion between Bolsa Bay and Bolsa Chica Basin MPAs	Potentially combine Bolsa Bay with Bolsa Chica Basin MPAs?	No	State Lands requirement to have fishing				Boundary Change	Yes, would change from SMCA to SMR. No consensus
Orange	Bolsa Chica Basin No-Take SMCA	No Take. Allows for maintenance of artificial structures	Water management infrastructure is failing - needs management and repairs. Shoaling and potential closing of inlet - need cost effective alternative to dredging and $ to implement. Could ultimately change boundaries of MPAs	MPA should cover all waters in ecological reserve. Move northeastern boundary to Graham	Yes	Makes enforcement easier so CDFW can cite for unlawful fishing using 632 instead of no trespassing		OC Coastkeeper	Wendy Berube	Boundary Change	
Orange	Bolsa Chica Basin No-Take SMCA	No Take. Allows for maintenance of artificial structures	Confusion between Bolsa Bay and Bolsa Chica Basin MPA regulations and whether take is allowed. Bridge inconsistency	Change purple to red for outreach purposes	Yes	Easier to explain "no take" if consistent with red SMR		OC Coastkeeper	Wendy Berube	Other	

Orange	Upper Newport Bay SMCA	Rec take of finfish by hook and line from shore in designated areas only	Ecological Reserve and MPA overlapping jurisdiction. Fishing from floats by PCH bridge and using gill nets at Jamboree	No change	Yes		Harbor and estuary signs needed at Newport Dunes. Additional enforcement personnel/efforts are needed				
Orange	Crystal Cove SMCA	Rec take of finfish by hook and line or by spearfishing and spiny lobster and sea urchin. Commercial take of sea urchin, spiny lobster by trap, and coastal pelagic species by round haul net, brail gear and light boat	Harmful tidepooling and undersized lobster. Nighttime poaching. Angle is difficult at southern boundary	Better define tidepool definition to encompass rocky intertidal habitat	Yes	"Area encompassing the rocky pools" is confusing, makes it sounds like it is only the pools, not intertidal zone when dry	Night vision for State Parks officers to address nighttime poaching	State Parks pending review; OC Coastkeeper	Wendy Berube	Language Change	
Orange	Crystal Cove SMCA	Rec take of finfish by hook and line or by spearfishing and spiny lobster and sea urchin. Commercial take of sea urchin, spiny lobster by trap, and coastal pelagic species by round haul net, brail gear and light boat		Add "non-living, geological or cultural" marine resource to tidepool take prohibition for consistency with 632(a)1(C)	Yes	Clarifies tidepool protections to include rocks and shells		State Parks pending review; OC Coastkeeper	Wendy Berube	Language Change	
Orange	Laguna Beach SMR	No Take	Poaching in gated/private communities; angle is difficult at northern boundary	No change	Yes		More enforcement needed in private community. Bring back community scientist/anglers (i.e., CCFRP) to OC				
Orange	Laguna Beach No-Take SMCA	No Take. Maintenance allowed	Angle is difficult at southern boundary	Change purple to red for outreach purposes	Yes	Easier to explain "no take" if consistent with red SMR	Produce map that has layer that shows allowed maintenance/artificial structures and scientific take	OC Coastkeeper	Wendy Berube	Other	
Orange	Dana Point SMCA	Rec take of finfish by hook and line or by spearfishing and spiny lobster and sea urchin. Commercial take of sea urchin, spiny lobster by trap, and coastal pelagic species by round haul net, brail gear and light boat. Tidepools protected	Fishing without a license. Night poaching at 3 Arch. Take of limpets at north end. Shift in fishing pressure. Angle is difficult at southern boundary. Harmful tidepooling	Add "non-living, geological or cultural" marine resource to tidepool take prohibition for consistency with 632(a)1(C)	Yes	Clarifies tidepool protections to include rocks and shells		OC Coastkeeper	Wendy Berube	Language Change	
Orange	Dana Point SMCA	Rec take of finfish by hook and line or by spearfishing and spiny lobster and sea urchin. Commercial take of sea urchin, spiny lobster by trap, and coastal pelagic species by round haul net, brail gear and light boat. Tidepools protected		Better define tidepool definition to encompass rocky intertidal habitat or utilize a different term.	Yes	Tidepools are specific to pools but intertidal habitats protected can be free of pools in some cases. "Area encompassing the rocky pools" is unclear whether all rocky intertidal habitat is included here.		OC Coastkeeper	Wendy Berube	Language Change	
San Diego	Batiquitos Lagoon No-Take SMCA	No take. Boating, swimming, wading and diving prohibited	Confusion between ecological reserve regulations west of 5 and MPA regulations east of 5	Expand SMCA west of I-5 bridge to encompass all of ecological reserve	No	Expands MPA size, unclear on impacts to recreational fishing				Boundary Change	

San Diego	Batiquitos Lagoon No-Take SMCA	No take. Boating, swimming, wading and diving prohibited		Change to blue SMCA with designated fishing areas	Maybe	If does not reduce fishing opportunities under I-5 and 101 bridges, or lessen existing protections				Take Allowance Change	Yes, would change from No-Take SMCA to SMCA
San Diego	Batiquitos Lagoon No-Take SMCA	No take. Boating, swimming, wading and diving prohibited		Change purple to red for outreach purposes if boundaries remain the same	Yes	Easier to explain "no take" if consistent with red SMR				Other	
San Diego	Swami's SMCA	Rec take by hook and line from shore and rec take by spearfishing of white seabass and pelagic finfish	Harmful tidepooling, especially at Seaside reef. Enforcement for take of lobster is hard at southern boundary since it splits 2 jurisdictions and the reef (hard to know where they are actually taking from and who is responsible for enforcing what.)	Move southern boundary to jurisdictional boundary between State Parks and City of Solana Beach for full tidepool protection of reef	No	Increases size of MPA, reducing fishing access, and may impact take of halibut				Boundary Change	
San Diego	Swami's SMCA	Rec take by hook and line from shore and rec take by spearfishing of white seabass and pelagic finfish		Shift entire shape south (lifeguard tower to state/Solana Beach line to cover tidepool on south side)	Yes	Compromise. Keeps same size MPA but covers impacted tidepool area on southern boundary. Lifeguard tower clear boundary at north end		State Parks pending review; Wildcoast		Boundary Change	
San Diego	San Elijo Lagoon No Take SMCA	No take. Boating, swimming, wading and diving prohibited	Lots of people fishing at entrance to San Elijo lagoon under bridge and in channel	Move boundary to west side of the bridge (prohibiting fishing under the bridge) as long as accommodations are allowed for dredging	Yes	Signs are currently posted on west side of bridge to prohibit people from entering the San Elijo Lagoon. Makes outreach clearer		State Parks pending review; Wildcoast		Boundary Change	
San Diego	San Elijo Lagoon No Take SMCA	No take. Boating, swimming, wading and diving prohibited		Change purple to red for outreach purposes	Yes	Easier to explain "no take" if consistent with red SMR				Other	
San Diego	San Dieguito Lagoon SMCA	Rec take of finfish by hook and line from shore. Boating, swimming, wading and diving prohibited	Confusion between ecological reserve boundaries and regulations and MPA boundaries and regulations. Speculation that extent of water has changed since restoration. Original intent of 632 was to align with 630 in overlapping waters. Non-MPA areas are more restrictive which leads to confusion	Have MPA cover all water within ecological reserve.	Need more information	Check with Joint Power authority because would lessen protections if SMCA (that allows fishing) is expanded to all state waters	Sea level rise impacts should be considered			Boundary Change	
San Diego	San Diego-Scripps Coastal SMCA	Rec take of coastal pelagic species, except market squid, by hook and line only	Harmful tidepooling. People using gear types for fishing for species other than coastal pelagics but gear type cannot assume intent. Makes enforcement difficult. Also safety concerns with surf casters into high use swim/surf area	Add, "except from shore" to prohibit surf hook and line	Yes	Surf fishing from shore causes safety concerns (hooks getting caught on surfers/swimmers). Still allows kayakers to fish for bait fish on way out, which was original intent				Take Allowance Change	

San Diego	Matlahuayl SMR	No Take	Harmful tidepooling. Kayak fishing. Caves are being defaced/ graffitied	Add place name (La Jolla) to traditional Kumeyaay name (Matlahuayl)	No	Keep Kumeyaay name only for Tribal acknowledgement. Would also add confusion between other La Jolla MPAs	More focused patrols on caves in La Jolla to address littering/defacement of MPA			Language Change	
San Diego	South La Jolla SMR	No Take	Most highly cited MPA. Poaching of lobster and offshore fishing. Harmful tidepooling. Challenges of parking and access (coastline related challenges due to sea level rise, climate disturbance)	No change	Yes	Focus on local management/outreach/enforcement	Need for more focus on tidepools (outreach/ enforcement). More staff for allied agencies to help enforce. Encourage city to maintain safe accessways and deal with coastal erosion problems. More education on marine mammal disturbance				
San Diego	South La Jolla SMCA	Rec take of pelagic finfish by hook and line only		No change	Yes						
San Diego	Famosa Slough No Take SMCA	No Take	Homeless encampments. Construction run-off. Dogs and cats disturbing birds	Change purple to red for outreach purposes	Yes	Easier to explain “no take” if consistent with red SMR				Other	
San Diego	Cabrillo SMR	No Take	Harmful tidepooling. Offshore boats but NPS unable to contact other than through megaphone	Work with Kumeyaay to rename MPA to traditional Kumeyaay name	Yes	Kumeyaay name exists for this location. Need to confirm spelling	Additional enforcement personnel/efforts are needed			Language Change	
San Diego	Tijuana River Estuary SMCA	Rec take of coastal pelagic species, except market squid, by hand held dip net. Commercial take of coastal pelagics, except market squid by round haul net	Difficult take regulations to interpret in the field and take by hand held dip net not really occurring, per Imperial Beach lifeguards	No change							

Cell: K138
Note: was not sure about this categorization
MPA Collaborative

From: Devin O'Dea <[redacted]>
Sent: Thursday, February 1, 2024 04:10 PM
To: FGC <FGC@fgc.ca.gov>
Cc: Mark Smith <[redacted]>; Wayne Kotow <[redacted]>; Keely Hopkins <[redacted]>; California Chapter <[redacted]>
Subject: Discussion Item 10 - Regulation change petitions (marine)

Dear Commission Staff,

Please accept the attached comment letter on behalf of Backcountry Hunters & Anglers, the Coastal Conservation Association of California, and the Congressional Sportsman's Foundation pertaining to Discussion Item 10 at the upcoming Fish & Game Commission meeting.

Thank you,

Devin O'Dea | Western Policy & Conservation Manager
Backcountry Hunters & Anglers
Phone: (415) 246-5329
www.backcountryhunters.org

BACKCOUNTRY
HUNTERS & ANGLERS
CALIFORNIA

February 1, 2024

California Fish and Game Commission
715 P Street, 16th Floor,
Sacramento, CA 95814

RE: Discussion Item 10 - Regulation change petitions (marine)

Dear President Sklar, Vice President Zavaleta & Commissioners,

We appreciate the opportunity to comment on the numerous petitions under consideration at the February meeting of the California Fish & Game Commission, and we offer the perspective of the many hundred thousand supporters of our organizations to the Commission. We express grave concerns regarding several of the proposals to eliminate fishing access along large stretches of the California coast and argue that many of the petitions lack adequate scientific support and documentation to substantiate their positions.

The Decadal Management Review (DMR) of the Marine Protected Area Network (MPA) has offered important insights for MPA managers to help shape the adaptive management of MPA regulations, including promising research that MPAs may increase biomass and provide resiliency against the impacts of a changing climate for some species. The intent of the Marine Life Protection Act (MLPA) and the stewardship of our coastal resources are of paramount importance to California's heritage. However, these laudable goals and conservation benchmarks should not preclude access to harvest coastal foods where state and federal fisheries managers have demonstrated robust and resilient fish stocks without any current threat of overfishing, nor for those species where targeted fishing and active management would benefit the overall ecosystem balance.

There are numerous, seemingly well-intentioned petitions currently before the Fish & Game Commission that seek to preserve California's coastal waters citing anthropogenic impacts to biodiversity and ecosystems such as pollution, rising sea temperatures, disease, development and overfishing. While we support the intent to safeguard our fish stocks, biodiversity, and ecosystem integrity, we strongly disagree with the all-or-nothing approach adopted by many of the petitioners who proffer the wholesale elimination of fishing access without adequate scientific rationale or the acknowledgement of regulatory mechanisms already in place such as those established by the Magnuson-Stevens Fishery Conservation and Management Act working through the Pacific Fisheries Management Council, National Oceanic and Atmospheric Administration (NOAA) Fisheries, the California Department of Fish and Wildlife (CDFW), the Fish & Game Commission, and the additional state/federal laws and agencies dedicated to this task. Simply put, many of the petitions referenced below seek to advance preservation at all costs, pushing for wholesale closures that circumvent the regulatory processes already in place, ultimately bludgeoning access for the diverse angling communities that have revered these coastal traditions for generations.

Anglers and consumptive users will often be the first and loudest voices to advocate for restrictions or even closures to ensure the sustainability of a fishery, as evidenced by the numerous fishing groups and organizations advocating for the closure of the 2023 salmon season following the data and dismal projections provided by the Pacific Fisheries Management Council and CDFW. However, a Californian

constitutional right to fish seems to stand in conflict with the presumption that restriction of access is permissible where there is a lack of scientific evidence or data to justify the closure. Section 1, Article 25 of the California Constitution states, "the people shall have the right to fish upon and from the public lands of the State and in the waters thereof," and the courts in re Quinn (1973) defined "public lands of the state" referenced in this article to include "access to fish in the inland streams and coastal waters of the state."

Shore fishing, diving/spearfishing, kayak/boat fishing and coastal gathering are low impact activities that reflect the broad spectrum of California's diverse community and constitute a valuable resource for individuals across the economic divide to access nature and provide food for their families. We encourage the Commission and MPA managers to consider the numerous communities that enjoy the state's many sustainable food resources when considering protections and recommendations that might unnecessarily exclude these groups. We feel that these considerations are in line with the California Natural Resources Agency's Outdoors for All initiative and its commitment in the Pathways to 30x30 document to "implement projects that do no further harm or pose unintended consequences to historically marginalized communities."[1] Specifically, we wish to highlight this issue with regards to the expansion of California's MPA network which restricts shore-based diving, foraging, and fishing access for all Californians – especially historically marginalized communities, communities of color and Native American tribes. From California's Constitutional Right to Fish:

> Anglers from historically marginalized communities may be less able to travel to fishing locations and are more likely to require shore access, as opposed to access from a boat. Anglers in communities like this need accessible shore-fishing, particularly given the importance of subsistence fishing in poorer communities. Moreover, fishing opportunities offer physical and psychological benefits to disadvantaged communities, not just access to fish as food.[2]

It is within this context that we urge the Commission to take the following actions with regards to the petitions they have received.

Petition 2023-14MPA: *Allow commercial take of red sea urchins in nine state marine conservation areas (SMCAs)*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-15MPA: *Reclassify three northern Channel Islands state marine reserves (SMRs) to SMCAs and allow take of highly migratory species, pelagic finfish, and/or coastal pelagic finfish*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation, but are encouraged by the proposal and the potential opportunity to gather more data on limited take MPAs and long-term MPA monitoring at the Channels Islands.

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[1] https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/30-by-30/Final_Pathwaysto30x30_042022_508.pdf

[2] Coats, Francis, and Karrigan Bork. "CALIFORNIA'S CONSTITUTIONAL RIGHT TO FISH." *Environmental Law*, vol. 51, no. 4, 2021, pp. 1085–147. *JSTOR*, https://www.jstor.org/stable/48647570. Accessed 22 Mar. 2023.

Petition 2023-16MPA: *Reclassify Stewarts Point and Bodega Head SMRs to SMCAs and allow commercial take of salmon.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-18MPA: *Modify allowed uses for four marine protected areas (MPAs) in Santa Barbara Channel and eliminate two special closures.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-19MPA: *Designate new "Chitqawi" SMCA near Morro Bay for California-Chumash co-management*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-20MPA: *Reclassify and rename Point Buchon SMR to "Chumash SMCA" for co-management with tribal take exemption.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-21MPA: *Modify Pyramid Point SMCA to remove recreational take of surf smelt and allow tribal take exemption for Tolowa Dee-ni' Nation.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-22MPA: *Define "rocky intertidal zone," add research, monitoring, restoration and education allowance, and clarify protections in several Orange County MPAs.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-23MPA*: Reclassify three SMCAs to SMRs, designate one new SMR in Monterey, and make various changes related to kelp restoration.*

We recommend the Commission deny this petition.

While the petitioner's intent to restore kelp forests and ecosystem integrity at tankers reef and in the surrounding waters is laudable, this broadly proscriptive petition would unnecessarily restrict access for anglers where there is no clear scientific rationale. In fact, the petitioner submitted a very similar petition seeking to close access for groundfish along a large stretch of the coast in this region in 2023 which the Department of Fish & Wildlife rejected citing a lack of scientific evidence to support the claim. We support the ongoing efforts to restore kelp forests through urchin culling and other means, however we oppose reclassifying these SMCAs to SMRs and the establishment of a new SMR in Monterey.

Petition 2023-24MPA: *Expand Laguna Beach no-take SMCA southward to border of City of Laguna Beach and modify Dana Point SMCA boundaries*

We recommend the Commission deny this petition.

We oppose this petition on the basis that it lacks scientific documentation or justification to eliminate fishing access in the proposed area. The petitioner argues primarily for administrative ease that the no-take closure be extended to the edge of city limits. During the implementation of the MLPA, MPAs were sited utilizing careful selection criteria based on habitat type, proximity from other MPAs, impact to communities and more. The petitioner argues that all beaches within the City of Laguna Beach should be no-take MPAs in order to streamline enforcement and that homeowners "feel that it is not equitable to have only the north and central beaches protected." It should be noted that the petitioner also states clearly in the Economic or Fiscal Impact section of the petition that "estimated resident property values gain an increase of 20% from proximity to a fully protected MPA" which may explain more robust support from the city and homeowners.

The petitioner also cites kelp forest health as justification for eliminating fishing access, however the 100 + page report included with the petition doesn't reference fishing pressure or boat activity with regards to kelp forest health and instead focuses on water temperature, nutrients, wave height, upwelling, rainfall and other stressors. As such, we recommend the Commission deny this petition since there is no scientific documentation to support its claims, and it would only negatively impact anglers who would be forced to travel further to reach fishing grounds.

Petition 2023-27MPA: *Reclassify a portion or all of Anacapa SMCA to an SMR to protect eelgrass*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation. We recognize the value of eelgrass beds for overall ecosystem health and habitat; however, it should be noted that many recreational anglers who target pelagic fish do not anchor and instead prefer to drift fish or troll instead which would have zero impact on the bottom habitat and eelgrass.

Petition 2023-28MPA: *Designate a new SMR at Point Sal, or designate as an SMCA with a tribal take exemption based on tribal consultation*

We recommend the Commission deny this petition.

While the petitioner takes time to identify the important habitat types, larval transport zones, and cultural significance of the Point Sal area, and they reference potential threats to the region from coastal development and industry, they fail to elaborate in any substantive way why fishing access should be removed from this wild and iconic central coast fishing destination. The petitioner states: "current [commercial] fishing in the proposed area is limited, likely due to its considerable distance from nearest port areas of Morro Bay and Santa Barbara." They also admit that they have no data or analysis with regards to recreational fishing and state, "our request to CDFW for recreational fishing data from this area was being processed at time of submission; we will evaluate the potential impact to recreational fishers and submit it to the state following receipt of the requested data."

A limited google search of "Point Sal fishing" also uncovers a large number of recreational fishing blogs and videos detailing the remote and adventurous hike to fish this area from a diverse population of anglers. In 2023 one blogger wrote, "had a great time hiking miles and miles and miles to fish Point Sal with Martin Mansera from Mansera Outdoors…It's such a remote location and so difficult to access, it

makes for a really rad adventure." Recreational fishing trips to the area by boat are also common, and fishing is noted in nearly every travel guide or city/county website that talks about visiting Point Sal.

Regarding access and disadvantaged communities, the petitioner writes, "the California Environmental Protection Agency identifies the adjacent city of Guadalupe as "disadvantaged" under CA Senate Bill 535, and their synthesis of environmental and socioeconomic indicators further reveals that Guadalupe – alongside Santa Maria and Lompoc – are underprivileged communities that experience significant cumulative impacts from pollution. Given these communities' close proximity to Point Sal, implementing an SMR at the proposed site could enhance access for disadvantaged populations to valuable coastal resources and fishing opportunities."

To justify this confounding claim that removing fishing access could somehow *enhance fishing opportunities* for disadvantaged communities, the petitioner cites a study of commercial lobster fishing and the concept of "spillover." They write, "California's MPAs have been shown to increase the biomass of fishery-targeted species and promote "spillover" into nearby coastal areas, benefitting nearby fishing grounds."

Spillover and the positive impacts to fisheries located in waters adjacent to MPAs are often referenced in association with the MPA network, and the limited, initial science has demonstrated some positive correlations with spillover of invertebrates like lobsters to adjacent fishing grounds in select study areas and commercial fishing for tuna in Hawaii. However, there remains an opportunity to further study this hypothesis and to promote scientific research that successfully documents spillover of targeted finfish across the MPA network in California. Some data from MPA monitoring along the Central California Coast indicated limited evidence of spillover from targeted finfish that were tagged and recaptured at a later point during the study period as evidenced from the Starr et al study: Variation in Responses of Fishes across Multiple Reserves within a Network of Marine Protected Areas in Temperate Waters:

> As of July 2014, a total of 251 individual tag recaptures have been reported (Table 8). Tagged fishes were recaptured by commercial and recreational hook-and-line fishermen, commercial trap fishermen, SCUBA divers, and during our fishing surveys. Of all the tagged fishes recapture and reported, 71% were recaptured in the same site and grid cell as they were released, and 22% of recaptured fishes were caught within the same site but outside the original grid cell where they were released. Only 18 fish, or 7% of the recaptured fishes, were recaptured beyond the boundaries of the MPA or REF site in which they were released. The mean net distance moved by eight of nine species recaptured was less than half the length of the MPAs we studied.[3]

While we do not seek to draw conclusions regarding the overall merits of spillover to adjacent fisheries from the results of one study, we do encourage additional research to evaluate the impacts that MPAs have on local fisheries and fisheries as a whole, especially within the context of varied siting and disparate habitat types evidenced across the MPA network. As the Forcada study indicated, "We conclude that spillover effects are not a universal consequence of siting MPAs in temperate waters and they are related to the distribution of habitats inside and around MPAs." (Forcada et al., 2009).

Due to the limited scientific understanding of spillover as it relates to the Marine Protected Area Network as a whole, especially with regards to finfish which would be the primary target of recreational shore and

[3] 4 Starr RM, Wendt DE, Barnes CL, Marks CI, Malone D, et al. (2015) Variation in Responses of Fishes across Multiple Reserves within a Network of Marine Protected Areas in Temperate Waters. PLOS ONE 10(3): e0118502. https://doi.org/10.1371/journal.pone.0118502

boat-based anglers at Point Sal, we disagree with the petitioner's logical assumptions and the argument as a whole. In fact, when considered in the context presented from the *Constitutional Right to Fish* article, the discussion is turned on its head entirely. "Anglers from historically marginalized communities may be less able to travel to fishing locations and are more likely to require shore access, as opposed to access from a boat. Anglers in communities like this need accessible shore-fishing, particularly given the importance of subsistence fishing in poorer communities."[4]

With the two large no-take SMRs located just South of this newly proposed MPA (Vandenberg SMR & Point Conception SMR) and Point Buchon to the North, it would seem the opportunities to fish and forage the coast for residents of Guadalupe, Lompoc and Santa Maria are already few and far between. In fact, in 2022 the City of Lompoc petitioned the Fish & Game Commission to allow for shore-fishing access along a ½ mile stretch of beach with in the Vandenberg SMR, citing a lack of access to historic fishing grounds for the local communities.

We share the petitioner's concerns regarding habitat disruption from off-shore energy production and the associated infrastructure, however, we note the likely establishment of the Chumash Heritage National Marine Sanctuary (CHNMS) designation which would effectively curtail any development or offshore energy production in this region. Planning for the CHNMS has included fishing access as a key component of the proposed designation.

As a result, we recommend the Commission deny this petition.

Petition 2023-29MPA: *Designate a new SMCA with a tribal take exemption for and co-management with Santa Ynez Band of Chumash Indians in Santa Barbara*

We recommend the Commission deny this petition.

We oppose the petitioner's request to designate a new, no-take SMCA in Carpinteria for several reasons. First, the petitioner argues that spacing and connectivity is a key concern in this location with the distance between the Campus Point and Point Dume SMCAs at 64 nautical miles (nm) instead of the recommended 54 nm to ensure ecological connectivity. When this request is examined within the broader context of MPA siting, it is clear that the target spacing between MPAs could be easily achieved by moving the Campus Point SMCA South or the Point Dume SMCA North, since both are located well-within the recommended 54nm from adjacent MPAs on either side.

Additionally, the petitioner cites the location as important nursery habitat for juvenile great white sharks as justification for establishing a no-take SMR. They write, "Research conducted in the Southern California Bight has found that fisheries bycatch is likely the main source of mortality for JWS." However, the article they cite to support this claim, John F. Benson et. al., discloses that for great white sharks they captured and tagged, "mortality risk was substantially greater off the coast of Baja, Mexico compared with California." Importantly, the research paper also states, "that incidental gillnet capture continues to be the primary source of mortality for juveniles. The lower mortality risk we documented in California waters suggests that full closure of gillnet fishing close to shore is a more effective management strategy than simply banning targeted fishing to reduce mortality risk due to bycatch." [5]

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[4] Coats, Francis, and Karrigan Bork. "CALIFORNIA'S CONSTITUTIONAL RIGHT TO FISH." *Environmental Law*, vol. 51, no. 4, 2021, pp. 1085–147. *JSTOR*, https://www.jstor.org/stable/48647570. Accessed 22 Mar. 2023.

[5] Benson JF, Jorgensen SJ, O'Sullivan JB, et al. Juvenile survival, competing risks, and spatial variation in mortality risk of a marine apex predator. *J Appl Ecol*. 2018; 55: 2888–2897. https://doi.org/10.1111/1365-2664.13158

As the petitioner is undoubtedly aware, gillnet fishing is banned in state waters and therefore the proposed MPA would have no impact on the gillnet fishery or likely the mortality risk to great white sharks.

The petitioner notes the location's popularity with recreational lobster divers and the likely opposition from stakeholders who would oppose the additional loss of access. The mortality risk to great white sharks from the recreational lobster fishery is zero, similar to the risk from spearfishing, yet the petitioner seeks to eliminate access entirely without providing any scientific rationale for the closure. As a result, we request that the Commission deny this petition.

Petition 2023-31MPA: *Reclassify Drakes Estero SMCA to an SMR and combine with Estero de Limantour SMR as a single SMR:*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation but encourage the Commission to maintain access for clamming unless there is a clear threat to the fishery or surrounding ecosystem.

It is worth noting that the National Park Service mentions in their comment letter that the area is now Congressionally Designated Wilderness and that "recreational take of shellfish appears to be very rare, [and] requires long kayak trips in wilderness area." Just because something is difficult doesn't mean it should be illegal.

Petition 2023-32MPA: *Reclassify Duxbury Reef SMCA as an SMR and expand northern and southern boundaries*

We recommend that the Commission deny or refer this petition to the Department of Fish & Wildlife for review and recommendation but emphasize maintaining fishing access for local communities at Duxbury Reef. The vast majority of complaints regarding Duxbury reef are related to enforcement and compliance, rather than a scientific justification for eliminating access. Shore fishing is an important past-time for the diverse communities that comprise the North Bay Area, and removing access to a popular fishing destination should not be justified simply based on the actions of a few bad apples.

Petition 2023-33MPA: *Expand the boundaries of five SMRs and one SMCA, and designate a new SMR off Pleasure Point, in Santa Cruz*

We recommend that this petition be denied or referred to the Department of Fish & Wildlife for review and recommendation due to its broad scope and complexity. The petitioner seeks to enhance protections for kelp forests, but does so with an overly broad brush. Rather than advocating for reducing fishing pressure for predators of kelp grazers, like lobster and sheepshead, the petition advocates for the closure of all fishing, including the harvest of grazer species like urchins that have been documented to decimate kelp forests.

The petitioner argues that eliminating fishing pressure within the proposed MPA areas would somehow bolster kelp populations, but the claim is not well documented by scientific research in this petition. A noteworthy case study, by comparison, is the ongoing Tanker's Reef kelp restoration project, where volunteers have been culling purple urchins within study plots and tracking kelp recovery within the study area and a control site nearby. The initial data for the last three years shows a clear correlation between the removal of purple urchins and kelp recovery in the study plot with no kelp recovery in the adjacent control where urchins were not removed. Fishing is permitted in the Tanker's reef area, however, in adjacent MPA's that have not permitted active restoration and where fishing is not allowed, urchin barons persist and kelp recovery remains minimal.

Kelp forest health and resiliency is a complex and multi-variable equation that can be impacted by numerous factors including water temperature, disease, pollution, algal blooms, wave energy, commercial harvest and more. We support efforts to restore kelp forests across the coast and recognize the role they play in the overall ecosystem health of fisheries, especially the abalone fishery that remains closed until 2026. We urge caution, however where broad fishing closures are enacted in the attempt to solve a problem that requires a more nuanced and carefully crafted multidisciplinary approach.

It should also be noted that the petitioner indicates support for recreational hook and line fishing and spearfishing as an acceptable alternative in several of the MPAs referenced in the petition.

Petition 2023-34MPA: *Reclassify Point Buchon SMCA to an SMR and modify take at Farnsworth Onshore and Offshore SMCAs to only allow recreational spearfishing.*

We recommend that the Commission deny this petition and we emphasize the substantial impacts to current fishing access. The petitioner argues that since the salmon season was closed in 2023 it will likely be closed in perpetuity, which would justify eliminating salmon and albacore fishing access at the Point Buchon SMCA. Salmon populations often decrease during drought years and can rebound with increased precipitation or water allocation as was the case in 2008 and 2009 when the fishery was closed and then reopened. We are cautiously optimistic that the salmon numbers will once again bounce back following the increased precipitation received over the past two years.

In the draft Pathways to 30x30 document, the CNRA writes: “It should be noted that limited-take State MPAs provide an excellent model for other jurisdictions looking to balance biodiversity conservation with sustainable well-managed commercial and recreational fishing.” We feel that reclassifying the Point Buchon SMCA as an SMR and eliminating fishing in this area would be inappropriate; however, we support any attempts to improve enforcement and compliance with existing regulations.

Furthermore, the proposal to modify take at Farnsworth Onshore and Offshore SMCAs would disproportionately impact a broad variety and collection of user groups who may not be physically able or inclined to spearfish. For this reason and the lack of concrete scientific data to justify the additional restrictions, we recommend the Commission deny this petition.

Sincerely,

Devin O’Dea
Western Policy & Conservation Manager
Backcountry Hunters & Anglers

Wayne Kotow
Executive Director
Coastal Conservation Association California

Keely Hopkins
Western States Manager
Congressional Sportsman’s Foundation

FGC@FGC

From: Rick Duenas <[redacted]>
Sent: Friday, February 2, 2024 8:41 AM
To: FGC
Subject: Public comment on several 2023-MPA petitions

Dear Members of the Commission,

My name is Rick Duenas. I reside in Pacifica, CA but recreate up and down the coast. I write to you as an avid angler and spearfisherman expressing concern and opposition regarding several of the 2023 MPA petitions that impact areas for which I am both a consumptive stakeholder and steward. Many of these petitions will exclude and alienate consumptive stakeholders from participating in the MPA network, whether through designation changes or boundary expansions. I urge you to please reject petitions 2023-23MPA, 2023-24MPA, 2023-26MPA, 2023- 27MPA, 2023-29MPA, 2023-32MPA, 2023-33MPA, and 2023-34MPA for the reasons enumerated below.

- 2023-23MPA: This petition will effectively ban fishing and spearfishing from the entire north side of the Monterey Peninsula by converting existing SMCAs to no-take SMRs. These SMCAs provide important nearshore opportunities for various consumptive stakeholders. The petitioner, as they attempted in a prior petition rejected by FGC (petition 2023-02), incorrectly claims eliminating finfish take will benefit kelp. In fact, the literature cited by the petition itself even states "[population and mean biomass responses] in the Central Coast MPAs were highly variable" and "kelp canopy monitoring from Landsat remote sensing did not detect a strong effect of MPA protection on average kelp canopy area." (Carr, et al.) This petition is not grounded in scientific reasoning or sound fisheries management and should be rejected.
- 2023-24MPA: This petition will effectively ban fishing, spearfishing, and all other take in the entirety of Laguna Beach. The petitioner cites ease of enforcement and anecdotal overharvesting and substrate degradation as rationale. This is unfair to consumptive stakeholders, essentially saying "it is too hard for city enforcement to learn the different regulations between different areas, so we want to impose a blanket ban on all consumptive stakeholders rather than addressing the root problem of educating the public." Frankly, this petition proposes lazy, non-adaptive management and should be rejected.
- 2023-26MPA: This petition aims to protect intertidal habitat and simplify enforcement but will effectively ban lobster diving from the productive reef at the southern end of Cardiff State Beach. This petition should be rejected and the petitioner advised to propose a smaller, intertidal-take-specific MPA in its place if that truly is the concern.
- 2023- 27MPA: This petition aims to protect eel grass against anchor and lobster trap damage by converting Anacapa SMCA to a no-take SMR but will effectively ban consumptive take on the entire northern side of Anacapa Island. Why not simply address these threats via regulation change instead of designation change? This petition should be rejected and the petitioner advised

to propose a regulation change that prohibits lobster trapping and anchoring shallower than 20 meters; this will allow anglers and divers to drift through or swim in, the intention of the original regulations.

- 2023-29MPA: This petition will effectively ban all take off Carpinteria in Santa Barbara County. This is a popular and important nearshore access opportunity for lobster diving, which is limited to shallow reefs like those found here. This petition should be rejected or revised to make an exemption for low impact take like lobster diving and shore angling.
- 2023-32MPA: This petition will severely limit shore angling opportunities off the Marin coastline. This is an equity issue in that shore-based anglers cannot simply motor to other areas in boats. This petition should be rejected in favor of public education and outreach.
- 2023-33MPA: This petition will severely limit consumptive stakeholder opportunities in several important kelp forests in Southern and Central California, kelp forests that provide equitable access to nearshore activities like angling, lobster diving, and spearfishing. It is inappropriate for a single petition to propose changes to seven unrelated areas; this petition should be split into seven distinct petitions to weigh stakeholder input for each specific area. These expansions are unnecessary in that they target kelp forests that have done particularly well the last decade without MPA intervention. The petition cites warm water events and pollution as threats to kelp forests, yet expanding MPA areas do nothing to mitigate these threats. It is also important to manage these areas in the status quo to serve as a scientific control to compare the efficacy of other MPAs against. This petition should be rejected. Particularly egregious proposals therein:
    - Expanding Cabrillo SMR as proposed will result in divers and anglers losing access to 100% of nearshore reefs and kelp in San Diego.
    - Expanding South Point SMR as proposed will result in divers and anglers losing access to 50% of the south coastline of Santa Rosa Island.
    - Expanding Natural Bridges SMR (and intertidal-focused MPA) to 3nm offshore will eliminate large swaths of groundfish and salmon opportunity from anglers, completely unrelated to the inshore kelp.
    - Designating the Pleasure Point SMR as proposed will result in divers and anglers losing access to important inshore reefs and kelp in eastern Santa Cruz County.
- 2023-34MPA: This petition aims to ease enforcement and compliance by converting Point Buchon SMCA to a no-take SMR. Again, this is throwing the baby out with the bath water. Moreover, the petitioner justifies prohibiting take of salmon because there is a temporary statewide salmon closure, leaving no room for this to change in the future with better recruitment conditions. This petition should be rejected in favor of public education, outreach, and increase enforcement emphasis on the existing MPA.

In summary, the aforementioned petitions alienate and restrict opportunity for a large cohort of consumptive stakeholders across the state in an uncompromising and blanket manner. These petitions should be rejected and the petitioners advised to re-group and bring to the table more specific solutions that address root causes to the compliance, enforcement and protection gaps identified as rationale.

Thank you for your time.

Sincerely,
Rick Duenas

FGC@FGC

From: Michael Eberhardt <[redacted]>
Sent: Sunday, February 4, 2024 11:33 AM
To: FGC
Subject: Subject: Opposition to Proposed MPAs - Petitions 2023-23MPA, 2023-24MPA, 2023-26MPA, 2023-29MPA, 2023-32MPA, and 2023-33MPA

Michael Eberhardt

[redacted]

San Francisco, CA [redacted]

[redacted]

[redacted]

2.4.24

Fish and Game Commission

715 P Street, 16th floor,

Sacramento, 95814

Subject: Opposition to Proposed MPAs - Petitions 2023-23MPA, 2023-24MPA, 2023-26MPA, 2023-29MPA, 2023-32MPA, and 2023-33MPA

Dear Commissioners,

I am writing to express my strong opposition to the series of Marine Protected Area (MPA) petitions currently under consideration, specifically 2023-23MPA, 2023-24MPA, 2023-26MPA, 2023-29MPA, 2023-32MPA, and 2023-33MPA. These proposed changes, I believe, are not only detrimental to the rights and

interests of consumptive stakeholders but are also lacking in scientific rationale, equitable enforcement strategies, and fail to directly address the purported environmental concerns.

2023-23MPA seeks to convert existing State Marine Conservation Areas (SMCAs) on the north side of the Monterey Peninsula into no-take State Marine Reserves (SMRs), effectively banning all fishing and spearfishing activities. This proposal disregards the importance of these areas for consumptive users and is based on the unfounded claim that prohibiting finfish take will benefit kelp forests. This approach is not supported by scientific evidence and overlooks the need for sound fisheries management practices.

2023-24MPA proposes a complete ban on fishing, spearfishing, and all other take activities in Laguna Beach. The justification for this sweeping prohibition—citing enforcement difficulties and anecdotal evidence of overharvesting—overlooks the fundamental issue of public education on existing regulations. This blanket approach unfairly penalizes law-abiding stakeholders and is an example of regulatory overreach based on convenience rather than necessity.

2023-26MPA aims to protect intertidal habitats at Cardiff State Beach but in doing so would unjustly prohibit lobster diving in one of the area's most productive reefs. This proposal is an overextension of enforcement simplification that sacrifices valuable recreational opportunities without considering more targeted and reasonable restrictions.

2023-29MPA seeks to eliminate all take activities off Carpinteria, impacting essential access for low-impact recreation such as lobster diving. This area is crucial for sustainable nearshore activities, and the proposed ban disregards the socio-economic benefits derived from these practices.

2023-32MPA would significantly restrict shore angling and some kayak fishing opportunities off the Marin coastline by expanding the Duxbury Reef SMCA. This change is proposed under the guise of enforcement ease but in reality, would severely limit public access to marine resources without a clear environmental justification.

2023-33MPA proposes broad restrictions across several key kelp forest areas in Southern and Central California. The sweeping nature of this petition fails to consider localized stakeholder input and does not effectively address the cited threats of warm water events and pollution. Instead, it would indiscriminately restrict access to valuable fishing grounds and recreational areas.

In summary, these petitions lack a balanced consideration of ecological preservation, stakeholder interests, and the socio-economic impact on local communities. They also fail to provide compelling scientific evidence to justify such extensive prohibitions. I urge the Commission to reject these proposals and to seek more targeted, science-based, and equitable solutions to marine conservation challenges.

Thank you for considering my views on this matter. I trust that the Commission will make decisions that are in the best interest of both our marine ecosystems and the communities that rely on them.

Sincerely,

Michael Eberhardt

FGC@FGC

From: Joe Huettl <[redacted]>
Sent: Sunday, February 4, 2024 4:12 PM
To: FGC
Subject: MPA

Dear President Sklar and Honorable Members of the Commission,

I am writing to oppose the following petitions under consideration at this month's Fish and Game Commission meeting.

2023-23MPA - Eliminating Tanker's Reef would remove an important area from a popular kayak fishing destination for rockfish, California halibut, sardines, and other fin fish. Kayak fishing has little or no impact on kelp beds. Changing three SMCAs to SMRs would also eliminate areas that are currently available and popular to catch squid recreationally. The petitioner makes statements regarding recreational fishing effects on both kelp health and diver safety that are not backed by science. The culling of urchins is listed as the primary strategy of kelp restoration and they do not make a good case for recreational fishing having much of an affect on that.

2023-33MPA - Expanding Natural Bridges SMR three nautical miles out goes far beyond the goals of the petition and severely negatively affects recreational fishing. Recreational fishing has little to no affect on kelp forests. Creating a new SMR at Pleasure Point would have a huge impact on recreational fishing with very little benefit to kelp restoration. This is a popular fishing area for non-motorized vessels and small boats. At some point these restrictions would eliminate Santa Cruz as a fishing destination, with local economic impacts to follow. In one of their letters they state that the proposed MPA is not subject to any significant commercial take. So the designation would affect sport fishing and diving for the most part.

2023-32MPA - Changing Duxbury Reef SMCA to an SMR will eliminate local shore fishing opportunities. Expanding the proposed SMR could have a negative affect on kayak and boat fishing.

2023-20MPA - Expanding Point Buchon North would eliminate one of the few ocean kayak fishing opportunities on the Central Coast.

Please take into account the loss of recreational fishing opportunities and their effect on local economies and morale.
This current barrage of petitions to expand the MPA network is meant to overwhelm the opposition and disregards the thousands of Californians who fish recreationally.

Sincerely,

Joseph Huettl
[redacted].
Walnut Creek , CA [redacted]

February 8, 2024

California Fish and Game Commission
715 P Street, 16th Floor,
Sacramento, CA 95814

RE: Discussion Item 10 - Regulation change petitions (marine)

Dear President Sklar, Vice President Zavaleta & Commissioners,

We appreciate the opportunity to comment on the numerous petitions under consideration at the February meeting of the California Fish & Game Commission, and we offer the perspective of the many hundred thousand supporters of our organizations to the Commission. We express grave concerns regarding several of the proposals to eliminate fishing access along large stretches of the California coast and argue that many of the petitions lack adequate scientific support and documentation to substantiate their positions.

The Decadal Management Review (DMR) of the Marine Protected Area Network (MPA) has offered important insights for MPA managers to help shape the adaptive management of MPA regulations, including promising research that MPAs may increase biomass and provide resiliency against the impacts of a changing climate for some species. The intent of the Marine Life Protection Act (MLPA) and the stewardship of our coastal resources are of paramount importance to California's heritage. However, these laudable goals and conservation benchmarks should not preclude access to harvest coastal foods where state and federal fisheries managers have demonstrated robust and resilient fish stocks without any current threat of overfishing, nor for those species where targeted fishing and active management would benefit the overall ecosystem balance.

There are numerous, seemingly well-intentioned petitions currently before the Fish & Game Commission that seek to preserve California's coastal waters citing anthropogenic impacts to biodiversity and ecosystems such as pollution, rising sea temperatures, disease, development and overfishing. While we support the intent to safeguard our fish stocks, biodiversity, and ecosystem integrity, we strongly disagree with the all-or-nothing approach adopted by many of the petitioners who proffer the wholesale elimination of fishing access without adequate scientific rationale or the acknowledgement of regulatory mechanisms already in place such as those established by the Magnuson-Stevens Fishery Conservation and Management Act working through the Pacific Fisheries Management Council, National Oceanic and Atmospheric Administration (NOAA) Fisheries, the California Department of Fish and Wildlife (CDFW), the Fish & Game Commission, and the additional state/federal laws and agencies dedicated to this task. Simply put, many of the petitions referenced below seek to advance preservation at all costs, pushing for wholesale closures that circumvent the regulatory processes already in place, ultimately bludgeoning access for the diverse angling communities that have revered these coastal traditions for generations.

Anglers and consumptive users will often be the first and loudest voices to advocate for restrictions or even closures to ensure the sustainability of a fishery, as evidenced by the numerous fishing groups and organizations advocating for the closure of the 2023 salmon season following the data and dismal projections provided by the Pacific Fisheries Management Council and CDFW. However, a Californian

constitutional right to fish seems to stand in conflict with the presumption that restriction of access is permissible where there is a lack of scientific evidence or data to justify the closure. Section 1, Article 25 of the California Constitution states, "the people shall have the right to fish upon and from the public lands of the State and in the waters thereof," and the courts in re Quinn (1973) defined "public lands of the state" referenced in this article to include "access to fish in the inland streams and coastal waters of the state."

Shore fishing, diving/spearfishing, kayak/boat fishing and coastal gathering are low impact activities that reflect the broad spectrum of California's diverse community and constitute a valuable resource for individuals across the economic divide to access nature and provide food for their families. We encourage the Commission and MPA managers to consider the numerous communities that enjoy the state's many sustainable food resources when considering protections and recommendations that might unnecessarily exclude these groups. We feel that these considerations are in line with the California Natural Resources Agency's Outdoors for All initiative and its commitment in the Pathways to 30x30 document to "implement projects that do no further harm or pose unintended consequences to historically marginalized communities."[1] Specifically, we wish to highlight this issue with regards to the expansion of California's MPA network which restricts shore-based diving, foraging, and fishing access for all Californians – especially historically marginalized communities, communities of color and Native American tribes. From California's Constitutional Right to Fish:

> Anglers from historically marginalized communities may be less able to travel to fishing locations and are more likely to require shore access, as opposed to access from a boat. Anglers in communities like this need accessible shore-fishing, particularly given the importance of subsistence fishing in poorer communities. Moreover, fishing opportunities offer physical and psychological benefits to disadvantaged communities, not just access to fish as food.[2]

It is within this context that we urge the Commission to take the following actions with regards to the petitions they have received.

Petition 2023-14MPA: *Allow commercial take of red sea urchins in nine state marine conservation areas (SMCAs)*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-15MPA: *Reclassify three northern Channel Islands state marine reserves (SMRs) to SMCAs and allow take of highly migratory species, pelagic finfish, and/or coastal pelagic finfish*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation, but are encouraged by the proposal and the potential opportunity to gather more data on limited take MPAs and long-term MPA monitoring at the Channels Islands.

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[1] https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/30-by-30/Final_Pathwaysto30x30_042022_508.pdf

[2] Coats, Francis, and Karrigan Bork. "CALIFORNIA'S CONSTITUTIONAL RIGHT TO FISH." *Environmental Law*, vol. 51, no. 4, 2021, pp. 1085–147. *JSTOR*, https://www.jstor.org/stable/48647570. Accessed 22 Mar. 2023.

Petition 2023-16MPA: *Reclassify Stewarts Point and Bodega Head SMRs to SMCAs and allow commercial take of salmon.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-18MPA: *Modify allowed uses for four marine protected areas (MPAs) in Santa Barbara Channel and eliminate two special closures.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-19MPA: *Designate new "Chitqawi" SMCA near Morro Bay for California-Chumash co-management*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-20MPA: *Reclassify and rename Point Buchon SMR to "Chumash SMCA" for co-management with tribal take exemption.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-21MPA: *Modify Pyramid Point SMCA to remove recreational take of surf smelt and allow tribal take exemption for Tolowa Dee-ni' Nation.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-22MPA: *Define "rocky intertidal zone," add research, monitoring, restoration and education allowance, and clarify protections in several Orange County MPAs.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-23MPA*: Reclassify three SMCAs to SMRs, designate one new SMR in Monterey, and make various changes related to kelp restoration.*

We recommend the Commission deny this petition.

While the petitioner's intent to restore kelp forests and ecosystem integrity at tankers reef and in the surrounding waters is laudable, this broadly proscriptive petition would unnecessarily restrict access for anglers where there is no clear scientific rationale. In fact, the petitioner submitted a very similar petition seeking to close access for groundfish along a large stretch of the coast in this region in 2023 which the Department of Fish & Wildlife rejected citing a lack of scientific evidence to support the claim. We support the ongoing efforts to restore kelp forests through urchin culling and other means, however we oppose reclassifying these SMCAs to SMRs and the establishment of a new SMR in Monterey.

Petition 2023-24MPA: *Expand Laguna Beach no-take SMCA southward to border of City of Laguna Beach and modify Dana Point SMCA boundaries*

We recommend the Commission deny this petition.

We oppose this petition on the basis that it lacks scientific documentation or justification to eliminate fishing access in the proposed area. The petitioner argues primarily for administrative ease that the no-take closure be extended to the edge of city limits. During the implementation of the MLPA, MPAs were sited utilizing careful selection criteria based on habitat type, proximity from other MPAs, impact to communities and more. The petitioner argues that all beaches within the City of Laguna Beach should be no-take MPAs in order to streamline enforcement and that homeowners "feel that it is not equitable to have only the north and central beaches protected." It should be noted that the petitioner also states clearly in the Economic or Fiscal Impact section of the petition that "estimated resident property values gain an increase of 20% from proximity to a fully protected MPA" which may explain more robust support from the city and homeowners.

The petitioner also cites kelp forest health as justification for eliminating fishing access, however the 100 + page report included with the petition doesn't reference fishing pressure or boat activity with regards to kelp forest health and instead focuses on water temperature, nutrients, wave height, upwelling, rainfall and other stressors. As such, we recommend the Commission deny this petition since there is no scientific documentation to support its claims, and it would only negatively impact anglers who would be forced to travel further to reach fishing grounds.

Petition 2023-27MPA: *Reclassify a portion or all of Anacapa SMCA to an SMR to protect eelgrass*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation. We recognize the value of eelgrass beds for overall ecosystem health and habitat; however, it should be noted that many recreational anglers who target pelagic fish do not anchor and instead prefer to drift fish or troll instead which would have zero impact on the bottom habitat and eelgrass.

Petition 2023-28MPA: *Designate a new SMR at Point Sal, or designate as an SMCA with a tribal take exemption based on tribal consultation*

We recommend the Commission deny this petition.

While the petitioner takes time to identify the important habitat types, larval transport zones, and cultural significance of the Point Sal area, and they reference potential threats to the region from coastal development and industry, they fail to elaborate in any substantive way why fishing access should be removed from this wild and iconic central coast fishing destination. The petitioner states: "current [commercial] fishing in the proposed area is limited, likely due to its considerable distance from nearest port areas of Morro Bay and Santa Barbara." They also admit that they have no data or analysis with regards to recreational fishing and state, "our request to CDFW for recreational fishing data from this area was being processed at time of submission; we will evaluate the potential impact to recreational fishers and submit it to the state following receipt of the requested data."

A limited google search of "Point Sal fishing" also uncovers a large number of recreational fishing blogs and videos detailing the remote and adventurous hike to fish this area from a diverse population of anglers. In 2023 one blogger wrote, "had a great time hiking miles and miles and miles to fish Point Sal with Martin Mansera from Mansera Outdoors…It's such a remote location and so difficult to access, it

makes for a really rad adventure." Recreational fishing trips to the area by boat are also common, and fishing is noted in nearly every travel guide or city/county website that talks about visiting Point Sal.

Regarding access and disadvantaged communities, the petitioner writes, "the California Environmental Protection Agency identifies the adjacent city of Guadalupe as "disadvantaged" under CA Senate Bill 535, and their synthesis of environmental and socioeconomic indicators further reveals that Guadalupe – alongside Santa Maria and Lompoc – are underprivileged communities that experience significant cumulative impacts from pollution. Given these communities' close proximity to Point Sal, implementing an SMR at the proposed site could enhance access for disadvantaged populations to valuable coastal resources and fishing opportunities."

To justify this confounding claim that removing fishing access could somehow *enhance fishing opportunities* for disadvantaged communities, the petitioner cites a study of commercial lobster fishing and the concept of "spillover." They write, "California's MPAs have been shown to increase the biomass of fishery-targeted species and promote "spillover" into nearby coastal areas, benefitting nearby fishing grounds."

Spillover and the positive impacts to fisheries located in waters adjacent to MPAs are often referenced in association with the MPA network, and the limited, initial science has demonstrated some positive correlations with spillover of invertebrates like lobsters to adjacent fishing grounds in select study areas and commercial fishing for tuna in Hawaii. However, there remains an opportunity to further study this hypothesis and to promote scientific research that successfully documents spillover of targeted finfish across the MPA network in California. Some data from MPA monitoring along the Central California Coast indicated limited evidence of spillover from targeted finfish that were tagged and recaptured at a later point during the study period as evidenced from the Starr et al study: Variation in Responses of Fishes across Multiple Reserves within a Network of Marine Protected Areas in Temperate Waters:

> As of July 2014, a total of 251 individual tag recaptures have been reported (Table 8). Tagged fishes were recaptured by commercial and recreational hook-and-line fishermen, commercial trap fishermen, SCUBA divers, and during our fishing surveys. Of all the tagged fishes recapture and reported, 71% were recaptured in the same site and grid cell as they were released, and 22% of recaptured fishes were caught within the same site but outside the original grid cell where they were released. Only 18 fish, or 7% of the recaptured fishes, were recaptured beyond the boundaries of the MPA or REF site in which they were released. The mean net distance moved by eight of nine species recaptured was less than half the length of the MPAs we studied.[3]

While we do not seek to draw conclusions regarding the overall merits of spillover to adjacent fisheries from the results of one study, we do encourage additional research to evaluate the impacts that MPAs have on local fisheries and fisheries as a whole, especially within the context of varied siting and disparate habitat types evidenced across the MPA network. As the Forcada study indicated, "We conclude that spillover effects are not a universal consequence of siting MPAs in temperate waters and they are related to the distribution of habitats inside and around MPAs." (Forcada et al., 2009).

Due to the limited scientific understanding of spillover as it relates to the Marine Protected Area Network as a whole, especially with regards to finfish which would be the primary target of recreational shore and

[3] 4 Starr RM, Wendt DE, Barnes CL, Marks CI, Malone D, et al. (2015) Variation in Responses of Fishes across Multiple Reserves within a Network of Marine Protected Areas in Temperate Waters. PLOS ONE 10(3): e0118502. https://doi.org/10.1371/journal.pone.0118502

boat-based anglers at Point Sal, we disagree with the petitioner's logical assumptions and the argument as a whole. In fact, when considered in the context presented from the *Constitutional Right to Fish* article, the discussion is turned on its head entirely. "Anglers from historically marginalized communities may be less able to travel to fishing locations and are more likely to require shore access, as opposed to access from a boat. Anglers in communities like this need accessible shore-fishing, particularly given the importance of subsistence fishing in poorer communities."[4]

With the two large no-take SMRs located just South of this newly proposed MPA (Vandenberg SMR & Point Conception SMR) and Point Buchon to the North, it would seem the opportunities to fish and forage the coast for residents of Guadalupe, Lompoc and Santa Maria are already few and far between. In fact, in 2022 the City of Lompoc petitioned the Fish & Game Commission to allow for shore-fishing access along a ½ mile stretch of beach with in the Vandenberg SMR, citing a lack of access to historic fishing grounds for the local communities.

We share the petitioner's concerns regarding habitat disruption from off-shore energy production and the associated infrastructure, however, we note the likely establishment of the Chumash Heritage National Marine Sanctuary (CHNMS) designation which would effectively curtail any development or offshore energy production in this region. Planning for the CHNMS has included fishing access as a key component of the proposed designation.

As a result, we recommend the Commission deny this petition.

Petition 2023-29MPA: *Designate a new SMCA with a tribal take exemption for and co-management with Santa Ynez Band of Chumash Indians in Santa Barbara*

We recommend the Commission deny this petition.

We oppose the petitioner's request to designate a new, no-take SMCA in Carpinteria for several reasons. First, the petitioner argues that spacing and connectivity is a key concern in this location with the distance between the Campus Point and Point Dume SMCAs at 64 nautical miles (nm) instead of the recommended 54 nm to ensure ecological connectivity. When this request is examined within the broader context of MPA siting, it is clear that the target spacing between MPAs could be easily achieved by moving the Campus Point SMCA South or the Point Dume SMCA North, since both are located well-within the recommended 54nm from adjacent MPAs on either side.

Additionally, the petitioner cites the location as important nursery habitat for juvenile great white sharks as justification for establishing a no-take SMR. They write, "Research conducted in the Southern California Bight has found that fisheries bycatch is likely the main source of mortality for JWS." However, the article they cite to support this claim, John F. Benson et. al., discloses that for great white sharks they captured and tagged, "mortality risk was substantially greater off the coast of Baja, Mexico compared with California." Importantly, the research paper also states, "that incidental gillnet capture continues to be the primary source of mortality for juveniles. The lower mortality risk we documented in California waters suggests that full closure of gillnet fishing close to shore is a more effective management strategy than simply banning targeted fishing to reduce mortality risk due to bycatch." [5]

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[4] Coats, Francis, and Karrigan Bork. "CALIFORNIA'S CONSTITUTIONAL RIGHT TO FISH." *Environmental Law*, vol. 51, no. 4, 2021, pp. 1085–147. *JSTOR*, https://www.jstor.org/stable/48647570. Accessed 22 Mar. 2023.

[5] Benson JF, Jorgensen SJ, O'Sullivan JB, et al. Juvenile survival, competing risks, and spatial variation in mortality risk of a marine apex predator. *J Appl Ecol*. 2018; 55: 2888–2897. https://doi.org/10.1111/1365-2664.13158

As the petitioner is undoubtedly aware, gillnet fishing is banned in state waters and therefore the proposed MPA would have no impact on the gillnet fishery or likely the mortality risk to great white sharks.

The petitioner notes the location's popularity with recreational lobster divers and the likely opposition from stakeholders who would oppose the additional loss of access. The mortality risk to great white sharks from the recreational lobster fishery is zero, similar to the risk from spearfishing, yet the petitioner seeks to eliminate access entirely without providing any scientific rationale for the closure. As a result, we request that the Commission deny this petition.

Petition 2023-31MPA: *Reclassify Drakes Estero SMCA to an SMR and combine with Estero de Limantour SMR as a single SMR:*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation but encourage the Commission to maintain access for clamming unless there is a clear threat to the fishery or surrounding ecosystem.

It is worth noting that the National Park Service mentions in their comment letter that the area is now Congressionally Designated Wilderness and that "recreational take of shellfish appears to be very rare, [and] requires long kayak trips in wilderness area." Just because something is difficult doesn't mean it should be illegal.

Petition 2023-32MPA: *Reclassify Duxbury Reef SMCA as an SMR and expand northern and southern boundaries*

We recommend that the Commission deny or refer this petition to the Department of Fish & Wildlife for review and recommendation but emphasize maintaining fishing access for local communities at Duxbury Reef. The vast majority of complaints regarding Duxbury reef are related to enforcement and compliance, rather than a scientific justification for eliminating access. Shore fishing is an important past-time for the diverse communities that comprise the North Bay Area, and removing access to a popular fishing destination should not be justified simply based on the actions of a few bad apples.

Petition 2023-33MPA: *Expand the boundaries of five SMRs and one SMCA, and designate a new SMR off Pleasure Point, in Santa Cruz*

We recommend that this petition be denied or referred to the Department of Fish & Wildlife for review and recommendation due to its broad scope and complexity. The petitioner seeks to enhance protections for kelp forests, but does so with an overly broad brush. Rather than advocating for reducing fishing pressure for predators of kelp grazers, like lobster and sheepshead, the petition advocates for the closure of all fishing, including the harvest of grazer species like urchins that have been documented to decimate kelp forests.

The petitioner argues that eliminating fishing pressure within the proposed MPA areas would somehow bolster kelp populations, but the claim is not well documented by scientific research in this petition. A noteworthy case study, by comparison, is the ongoing Tanker's Reef kelp restoration project, where volunteers have been culling purple urchins within study plots and tracking kelp recovery within the study area and a control site nearby. The initial data for the last three years shows a clear correlation between the removal of purple urchins and kelp recovery in the study plot with no kelp recovery in the adjacent control where urchins were not removed. Fishing is permitted in the Tanker's reef area, however, in adjacent MPA's that have not permitted active restoration and where fishing is not allowed, urchin barons persist and kelp recovery remains minimal.

Kelp forest health and resiliency is a complex and multi-variable equation that can be impacted by numerous factors including water temperature, disease, pollution, algal blooms, wave energy, commercial harvest and more. We support efforts to restore kelp forests across the coast and recognize the role they play in the overall ecosystem health of fisheries, especially the abalone fishery that remains closed until 2026. We urge caution, however where broad fishing closures are enacted in the attempt to solve a problem that requires a more nuanced and carefully crafted multidisciplinary approach.

It should also be noted that the petitioner indicates support for recreational hook and line fishing and spearfishing as an acceptable alternative in several of the MPAs referenced in the petition.

Petition 2023-34MPA: *Reclassify Point Buchon SMCA to an SMR and modify take at Farnsworth Onshore and Offshore SMCAs to only allow recreational spearfishing.*

We recommend that the Commission deny this petition and we emphasize the substantial impacts to current fishing access. The petitioner argues that since the salmon season was closed in 2023 it will likely be closed in perpetuity, which would justify eliminating salmon and albacore fishing access at the Point Buchon SMCA. Salmon populations often decrease during drought years and can rebound with increased precipitation or water allocation as was the case in 2008 and 2009 when the fishery was closed and then reopened. We are cautiously optimistic that the salmon numbers will once again bounce back following the increased precipitation received over the past two years.

In the draft Pathways to 30x30 document, the CNRA writes: “It should be noted that limited-take State MPAs provide an excellent model for other jurisdictions looking to balance biodiversity conservation with sustainable well-managed commercial and recreational fishing.” We feel that reclassifying the Point Buchon SMCA as an SMR and eliminating fishing in this area would be inappropriate; however, we support any attempts to improve enforcement and compliance with existing regulations.

Furthermore, the proposal to modify take at Farnsworth Onshore and Offshore SMCAs would disproportionately impact a broad variety and collection of user groups who may not be physically able or inclined to spearfish. For this reason and the lack of concrete scientific data to justify the additional restrictions, we recommend the Commission deny this petition.

Sincerely,

Devin O’Dea
Backcountry Hunters & Anglers

Rachel Fischer
National Marine Manufacturers Association

Wayne Kotow
Coastal Conservation Association California

James Stone
Nor-Cal Guides & Sportsman’s Association

Keely Hopkins
Congressional Sportsman’s Foundation

Larry Phillips
American Sportfishing Association

February 8, 2024

California Fish and Game Commission
715 P Street, 16th Floor,
Sacramento, CA 95814

RE: Discussion Item 10 - Regulation change petitions (marine)

Dear President Sklar, Vice President Zavaleta & Commissioners,

As an organization dedicated to ensuring our North American heritage of hunting and fishing in a natural setting with over 350,000 supporters, Backcountry Hunters & Anglers expresses serious concerns regarding several of the petitions currently before the California Fish & Game Commission that would eliminate fishing access along large stretches of the California coast.

The intent of the Marine Life Protection Act (MLPA) and the stewardship of our coastal resources are of paramount importance to California's heritage. However, these laudable goals and conservation benchmarks should not preclude access to harvest coastal foods where state and federal fisheries managers have demonstrated robust and resilient fish stocks without any current threat of overfishing, nor for those species where targeted fishing and active management would benefit the overall ecosystem balance.

There are numerous, seemingly well-intentioned petitions currently before the Fish & Game Commission that seek to preserve California's coastal waters citing anthropogenic impacts to biodiversity and ecosystems, such as pollution, rising sea temperatures, disease, development and fishing. While we support the intent to safeguard our fish stocks, biodiversity, and ecosystem integrity, we strongly disagree with the all-or-nothing approach adopted by many of the petitioners who proffer the wholesale elimination of fishing access without adequate scientific rationale.

Simply put, many of the petitions seek to advance preservation at all costs, pushing for wholesale closures that circumvent the regulatory processes already in place, ultimately bludgeoning access for the diverse angling communities that have revered these coastal traditions for generations.

Shore fishing, diving/spearfishing, kayak/boat fishing and coastal gathering are low impact activities that reflect the broad spectrum of California's diverse community and constitute a valuable resource for individuals across the economic divide to access nature and provide food for their families at the same time. We encourage the Commission and MPA managers to consider the numerous communities that enjoy the state's many sustainable food resources when considering protections and recommendations that might unnecessarily exclude these groups.

It is within this context that we urge the Commission to deny those petitions (outlined in our detailed letter to the Commission on 2/1/24) that would unnecessarily erode our longstanding coastal fishing and foraging traditions.

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2024-02-06 11:42:00.463		William	Amstutz						US	Petition Signed
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2024-02-05 23:50:53.107		Bob	Nelson						US	Petition Signed
2024-02-05 23:27:03.35	Mr.	Christopher	Reiger		[redacted]	Santa Rosa	CA	[redacted]	US	Petition Signed
2024-02-05 23:20:30.843		Fredrick	Robinson						US	Petition Signed
2024-02-05 23:18:20.8		Michael	Snyder						US	Petition Signed
2024-02-05 23:17:47.65		Mark	Hawn						US	Petition Signed
2024-02-05 23:07:45.24		Daniel	Bartee						US	Petition Signed
2024-02-05 22:57:33.25		jeremy	mcmillin						US	Petition Signed
2024-02-05 22:56:46.81		Stan	Perry		[redacted]	San Diego	CA	[redacted]	US	Petition Signed
2024-02-05 22:56:01.86		Dustin	Herrera						US	Petition Signed
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2024-02-05 22:14:29.21		Michael	Schubert		[redacted]	San Anselmo	CA	[redacted]	US	Petition Signed

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2024-02-05 21:44:00.633		Jeffrey	Reed						US	Petition Signed
2024-02-05 21:33:06.14		Jim	Velazquez		[redacted]	San Diego	CA	[redacted]	US	Petition Signed
2024-02-05 21:21:19.297		Reid	Lamson						US	Petition Signed
2024-02-05 21:12:35.05	Mr.	Nick	Zagaris		[redacted]	Auburn	CA	[redacted]	US	Petition Signed
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2024-02-05 18:13:53.773		Jeff	Bautista						US	Petition Signed
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2024-02-05 16:55:41.43		Carson	Dicicco						US	Petition Signed
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2024-02-05 16:31:18.907		Shaun	Dolan		[redacted]	Lakewood	CA	[redacted]	US	Petition Signed
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2024-02-05 16:15:20.363		Gregory	Scoles						US	Petition Signed
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2024-02-05 15:54:33.543		Matthew	Nurisso		[redacted]	Belmont	CA	[redacted]	US	Petition Signed

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2024-02-03 00:57:44.12		Scott	Brichan						US	Petition Signed
2024-02-03 00:44:29.22		Rosa	Zapata						US	Petition Signed
2024-02-03 00:04:29.733		Adam	Schaar						US	Petition Signed
2024-02-02 23:54:08.423		Daniel	Crouch						US	Petition Signed
2024-02-02 23:42:54.683		Joshua	Mann						US	Petition Signed
2024-02-02 23:37:53.183		Dave	Huebner						US	Petition Signed
2024-02-02 23:35:41.747		John	Aronson						US	Petition Signed
2024-02-02 23:34:49.057		Landon	Baggaley						US	Petition Signed
2024-02-02 23:18:58.11		Patrick	Young						US	Petition Signed
2024-02-02 23:14:05.52		Mark	Walline						US	Petition Signed
2024-02-02 22:31:18.197		Ryan	McGaffin						US	Petition Signed
2024-02-02 22:22:27.137		Timothy	Watson		[redacted]	Middle Grove	NY	[redacted]	US	Petition Signed
2024-02-02 21:27:23.713		Timothy	Padilla						US	Petition Signed
2024-02-02 21:22:05.84		Matthew	Broadley						US	Petition Signed
2024-02-02 21:08:03.4		Ryan	Tracey						US	Petition Signed
2024-02-02 21:05:54.64		Jose	Camarena						US	Petition Signed
2024-02-02 21:04:37.32		Erick	Burres						US	Petition Signed
2024-02-02 21:01:20.403		Adrian	Silveira						US	Petition Signed
2024-02-02 20:58:02.777		Shaun	Ayers						US	Petition Signed
2024-02-02 20:56:18.6		Tom	Stubbs						US	Petition Signed
2024-02-02 20:44:54.14		Rafael	Santillan						US	Petition Signed
2024-02-02 20:42:57.203		Alex	Selman						US	Petition Signed
2024-02-02 20:31:49.4		Zane	Murphy						US	Petition Signed
2024-02-02 20:21:30.41		Jeremy	Kerekes						US	Petition Signed
2024-02-02 20:20:07.45		Eric	Manahan		[redacted]	Hollis	ME	[redacted]	US	Petition Signed
2024-02-02 20:18:56.503		Marcus	LeBlanc		[redacted]	Grover beach	CA	[redacted]	US	Petition Signed
2024-02-02 20:10:44.193		Dave	Gifford						US	Petition Signed
2024-02-02 19:56:09.143		Dave	Rechel						US	Petition Signed
2024-02-02 19:43:54.443		Gabriel	Silveira						US	Petition Signed
2024-02-02 19:43:17.527		Eric	Bodjanac						US	Petition Signed
2024-02-02 19:40:58.32		Jesus	Padiernos						US	Petition Signed
2024-02-02 19:29:09.317		Jaime	Gutierrez						US	Petition Signed
2024-02-02 19:27:36.86		Darren	Gertler						US	Petition Signed
2024-02-02 19:15:32.903		SynKae	NG						US	Petition Signed
2024-02-02 19:15:13.213		Daniel	Silveira						US	Petition Signed
2024-02-02 19:06:32.177		Matthew	Bond						US	Petition Signed
2024-02-02 18:56:00.567		Cole	Pickford						US	Petition Signed
2024-02-02 18:55:34.027		Nick	DeFerrari						US	Petition Signed
2024-02-02 18:43:33.243		Cecilia	Giddings						US	Petition Signed
2024-02-02 18:05:26.83		Isaac	Beck						US	Petition Signed
2024-02-02 17:46:21.643		Clayton	Beaver						US	Petition Signed
2024-02-02 17:45:06.907		Travis	Craven						US	Petition Signed
2024-02-02 17:30:47.033		Eric	Tye						US	Petition Signed
2024-02-02 17:16:16.94		Benjamin	Kaslin						US	Petition Signed

2024-02-02 16:25:01.977		Matt	Rose						US	Petition Signed
2024-02-02 16:10:12.253		Kevin	Vella						US	Petition Signed
2024-02-02 15:56:10.45		Charlie	de la Rosa						US	Petition Signed
2024-02-02 15:55:01.117		Nicholas	Angus						US	Petition Signed
2024-02-02 15:38:15.073		Nick	Ippolito						US	Petition Signed
2024-02-02 15:34:39.867		Artin	Marootian						US	Petition Signed
2024-02-02 14:57:10.573		Sam	Narveson						US	Petition Signed
2024-02-02 14:52:04.667		Jacob	Morris						US	Petition Signed
2024-02-02 14:48:19.837		Jonathan	Hoang						US	Petition Signed
2024-02-02 14:44:36.137		Mitchell	Ward						US	Petition Signed
2024-02-02 14:40:14.187		Logan	Little						US	Petition Signed
2024-02-02 14:29:39.883		Josef	Sanchez						US	Petition Signed
2024-02-02 14:25:41.613		Leif	Bierer						US	Petition Signed
2024-02-02 14:09:39.14		JESSE	STOVALL		[redacted]	Fiddletown	CA	[redacted]	US	Petition Signed
2024-02-02 14:09:23.547		Mike	Costello						US	Petition Signed
2024-02-02 14:03:34.583	Mr.	Hunter	Miller		[redacted]	Kuna	ID	[redacted]	US	Petition Signed
2024-02-02 14:02:35.91		Jordan	Germyn						US	Petition Signed
2024-02-02 13:58:56.873		Gilberto	Garcia						US	Petition Signed
2024-02-02 13:58:51.957		Rod	Kazempour						US	Petition Signed
2024-02-02 13:56:33.713		Andrew	Miller						US	Petition Signed
2024-02-02 13:55:22.597		Micah	Dungey						US	Petition Signed
2024-02-02 13:51:26.967		Jacob	Weber						US	Petition Signed
2024-02-02 13:50:04.897		Chris	Chun						US	Petition Signed
2024-02-02 13:48:43.423		Jerry	Chang						US	Petition Signed
2024-02-02 13:48:06.903		Clayton	Thornton						US	Petition Signed
2024-02-02 13:47:17.947		Christopher	James						US	Petition Signed
2024-02-02 13:45:51.557		John	Phillips						US	Petition Signed
2024-02-02 13:45:40.09		James	Killiany						US	Petition Signed
2024-02-02 13:40:12.057		Richard	Owens						US	Petition Signed
2024-02-02 13:37:41.607	Mr.	Blane	Markham		[redacted]	Carmel	CA	[redacted]	US	Petition Signed
2024-02-02 13:36:49.903		Connor	Weber						US	Petition Signed
2024-02-02 13:35:29.397		Logan	Gillingham						US	Petition Signed
2024-02-02 13:31:21.977		Dennis	Kilian						US	Petition Signed
2024-02-02 13:29:17.553		Daniel	Collins						US	Petition Signed
2024-02-02 13:23:58.117		Phillip	Sanders						US	Petition Signed
2024-02-02 13:17:26.583		Derrik	Kapalla						US	Petition Signed
2024-02-02 13:16:58.097		Craig	Simes						US	Petition Signed
2024-02-02 13:15:13.017		Valerie	Bednarski						US	Petition Signed
2024-02-02 13:14:01.07		Elijah	Black						US	Petition Signed
2024-02-02 13:12:08.623		Philip	Adornato						US	Petition Signed
2024-02-02 13:10:44.163		owen	shapiro						US	Petition Signed
2024-02-02 13:10:37.263		Steve	Dolan						US	Petition Signed
2024-02-02 13:09:39.617		Nick	Garcia						US	Petition Signed
2024-02-01 21:14:07.19		Keynan	Hobbs						US	Petition Signed
2024-02-01 19:52:19.6		Allen	Noren						US	Petition Signed
2024-02-01 19:31:26.837		Devin	O'Dea						US	Petition Signed

FGC@fgc

From: Alejandro Meruelo [redacted]
Sent: Tuesday, March 19, 2024 12:48 PM
To: FGC
Subject: Oppose MPA expansion

Hello,

Hope all is well! My name is Alejandro Meruelo and I live in San Diego; I represent myself. I was writing in opposite to the proposed MPA expansion of Laguna Beach, Carpenteria, and the Monterey Peninsula. These are areas that rich in resources for selective spear fishers and kayakers who have little impact compared to commercial interests, and offer species unavailable in other areas of California.
It would be of great detriment to these groups of fishermen/women given that the areas are largely already surrounded by numerous MPAs that have served an important role in these areas.

Thank you for considering my opinion,
Alejandro

FGC@fgc

From: Patrick Spalding [redacted]
Sent: Tuesday, March 19, 2024 3:49 PM
To: FGC
Subject: Opposition to Proposed petitions

Dear Commission,

I was born in San Francisco and have lived my entire life along the central California coast. I have been actively engaged in freedive spearfishing since 2011. Based on the current scientific research, I do not support expansion of any MPAs in California. I specifically request that the Commission deny the petitions listed below. I appreciate your consideration, and I'm grateful for your support of our natural resources.

Sincerely,

Patrick Spalding

Petition 2023-23MPA

Petition 2023-33MPA

Petition 2023-34MPA

Petition 2023-29MPA:

Petition 2023-24MPA

From: California Fishermens Resiliency Association <californiafishermensresiliency@gmail.com>
Sent: Wednesday, July 3, 2024 06:44 PM
To: FGC <FGC@fgc.ca.gov>
Cc: [redacted] Steve Scheiblauer <[redacted]>; Dave Colker <[redacted]>; Jake Mitchell <[redacted]>; [redacted]
Subject: MPA Petitions Support/Object

California Fish and Game Commission
PO Box 944209
1416 Ninth Street Suite 1320
Sacramento, California 94244-2090

July 3, 2024

Re: MPA Petitions/Support/Object

Commissioners:

The California Fisherman's Resiliency Association (CFRA) expresses its support for the following Marine Protected Area (MPA) petitions:

2023 - 14 MPA
2023 - 15 MPA
2023 - 16 MPA
2023 - 18 MPA
2023 - 30 MPA

Our support is based on research conducted by the University of Washington (sustainable fisheries- us.org) which exactly states that MPA's have no positive affect on threats to marine life posed by ocean acidification, global warming, coastal development, terrestrial and urban run-off and human pollution of the world environment. "Recent reviews of the extensive MPA network in California have concluded there is no evidence for a regional increase in biodiversity, or targeted fish abundance, nor is there evidence for MPA's providing climate resiliency"

We provide no support for the following MPA petitions:

2023 - 19 MPA
2023 - 20 MPA
2023 - 21 MPA
2023 - 22 MPA
2023 - 23 MPA
2023 - 24 MPA
2023 - 25 MPA
2023 - 26 MPA
2023 - 28 MPA
2023 - 29 MPA
2023 - 31 MPA
2023 - 32 MPA
2023 - 33 MPA
2023 - 34 MPA

Thank you for this opportunity to comment.

Ken Bates, Executive Director
California Fishermen's Resiliency Association Member Associations

Crescent City Commercial Fishermen's Association
Trinidad Bay Fishermen's Association
Shelter Cove Fishermen's Preservation, Inc.
Salmon Troller's Marketing Association of Noyo
Bodega Bay Commercial Fishermen's Association
San Francisco Crab Boat Owners Association
Half Moon Bay Commercial Fishermen's Association
The Alliance of Communities for Sustainable Fisheries
Commercial Fishermen of Santa Barbara
Santa Cruz Commercial Fishermen's Association
Pacific Coast Federation of Fishermen's Associations

Cc: Dave Colker
Peter Halmay
Steve Scheiblauer
Jake Mitchell

From: Azsha Hudson <[redacted]>
Sent: Wednesday, July 31, 2024 05:10 PM
To: FGC <FGC@fgc.ca.gov>
Cc: Linda Krop <[redacted]>
Subject: August FGC Meeting: Written Comments for Item 6c

Hello,

Please see the attached file for our written comments for the upcoming FGC meeting.

Thank you

AZSHA HUDSON (she/her/hers)
MARINE CONSERVATION ANALYST &
PROGRAM MANAGER
906 Garden Street
Santa Barbara, CA 93101
o: [redacted] c: [redacted]
www.EnvironmentalDefenseCenter.org

environmental
DEFENSE CENTER

We recognize that EDC sits on occupied, unceded, stolen lands of the Chumash Peoples, on Shmuwich Territory, who have called this area home for time immemorial. We commit today to make space to elevate indigenous voices and support our local Chumash and indigenous communities in our work to protect our environment.

CONFIDENTIALITY NOTE: The information contained in this communication may be confidential, is intended only for the use of the recipient named above, and maybe legally privileged. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please re-send this communication to the sender and delete the original message and any copy of it from your computer system. Thank you.

environmental
DEFENSE CENTER

July 31, 2024

Samantha Murray, President
California Fish and Game Commission
715 P Street, 16th Floor
Sacramento, CA 95814

Re: Petition for Anacapa State Marine Conservation Area – Agenda Item 6(c)

Dear President Murray and Honorable Commissioners:

On behalf of the Environmental Defense Center ("EDC"), please consider our comments regarding the Marine Protected Area ("MPA") petition process instigated by California Department of Fish and Wildlife's ("CDFW") release of the MPA Network Decadal Management Review ("DMR") report. EDC is a public interest law firm that defends nature and advances environmental justice on California's Central Coast through advocacy and legal action. We primarily work in San Luis Obispo, Santa Barbara, and Ventura Counties. We celebrate the success of California's MPA Network ("the Network") and submit this letter to inform the Fish and Game Commission ("Commission") and CDFW of our intent to update our petition (2023-27MPA) for Anacapa Island State Marine Conservation Area ("SMCA") based on conversations we continue to have with the public.

I. COMMUNITY OUTREACH SUMMARY

We strongly support the Commission requesting and utilizing the feedback received from the public regarding next steps for the DMR process. We especially appreciate the centering of adaptive management as a guiding principle as we look to the next decadal review of the Network. In late 2023, the Commission requested that the public submit petitions for any changes to the Network; however, as this is an ever-evolving process, the Commission asked petitioners to prioritize community outreach following the deadline for petition submissions. We at EDC have done our part to inform our local community of the DMR process, as well as our Anacapa and Mishopshno (2023-29MPA) petitions, and we continue to engage our community.

906 Garden St. Santa Barbara, CA 93101
PHONE (805) 963-1622
www.EnvironmentalDefenseCenter.org

A. Legislators

Assemblymember Gregg Hart, 37th District – we met with Assemblymember Hart's staff, who indicated the Assemblymember was generally supportive of the MPA Network. When the Anacapa petition was explained, as well as the intent of EDC to flesh out alternative solutions, staff were supportive of continued community outreach to get their input. Staff agreed that a remedy should be identified to address the impacts of hard bottomed fishing gear on eelgrass.

Assemblymember Steve Bennett, 38th District – we met with Assemblymember Bennett's staff, who indicated the Assemblymember was generally supportive of the MPA Network. Assemblymember Bennett and his staff worked with EDC, Environment California, Natural Resources Defense Council, and Azul to write and deliver "ACR 210: Marine Protection Area" to the Water, Parks, and Wildlife Committee, as a means of supporting and strengthening the Network. Assemblymember Bennett's staff were supportive of the Anacapa Petition. Staff agreed that a remedy should be identified to address the impacts of hard bottomed fishing gear on eelgrass.

Santa Barbara County Supervisor Das Williams, 1st District – we met with Supervisor Williams, who expressed general support for the Network, as well as potential support for the creation of an MPA near Carpinteria. A follow up meeting is pending as EDC, along with partners, fleshes out the specifics of the Mishopshno MPA.

Santa Barbara County Supervisor-Elect Roy Lee, 1st District –we met with Mr. Lee, who expressed general support for the Network, as well as EDC's sponsorship of two petitions. He also asked about a possible petition to protect the harbor seal rookery east of Carpinteria State Beach.

U.S. Congressman Salud Carbajal, 24th Congressional District – we met with Congressman Carbajal's staff, who indicated that the Congressman generally supports highly and fully protected MPAs. His staff expressed concern about equal access for all the community, especially children, to natural areas. Once assured that EDC's petition for Anacapa would not restrict public access, there were no further concerns raised.

B. Fishing Community

Spearfishers – we met with Santa Barbara local spearfishers multiple times to discuss both our Anacapa petition as well as the Mishopshno petition. The members of a local spearfisher group expressed concern with access to highly protected MPAs, however, they added that they have noticed an uptick in lobster traps in Anacapa Island SMCA that make it difficult and potentially dangerous for them to navigate through the water. The spearfishers were open to discussing alternative solutions to protecting the marine environment that took into consideration community access.

Anglers – we met with a few anglers based in San Diego and Los Angeles counties who expressed concern with the original Anacapa Island petition as submitted to CDFW on

November 30, 2023. They explained the harm re-classifying the SMCA to a fully protected State Marine Reserve ("SMR") would have on community members whose interaction with the ocean is low impact. When EDC expressed our willingness to consider alternative solutions to the two proposals listed in the submitted narrative, the anglers, while not happy with possibly losing some access, understood that a compromise was needed to protect the ecosystem from obvious harm.

Commercial Fishermen of Santa Barbara – we met with Commercial Fishermen of Santa Barbara president Chris Voss and the Executive Director Kim Selkoe. Both expressed concerns with the MPA petition process in general, looking for economic impact analyses on local communities and fishing communities. They also expressed concern with petitions like Mishopshno connecting to tribal interests, as they are concerned that co-management would complicate enforcement. They stated that there is already oversight from federal and state entities and the inclusion of tribal enforcement could potentially add more limitations to commercial fishers. They stated interest in how the CEQA process will be integrated in the petition process, if it will at all.

Lobster fishers – we spoke with a couple of Santa Barbara County lobster fishers. They expressed general support for the Network, as they have directly benefited from the spillover effect. When the basis for our Anacapa petition was explained, most individuals supported protecting eelgrass. However, we are still looking to speak with a Channel Islands lobster fisher to get a more applied perspective.

C. Non-federally and federally recognized tribes

San Ynez Band of Chumash Indians – the Band is supportive of modifying the Anacapa SMCA to allow for the eelgrass meadow to be undisturbed and protected from lobster traps. They were slightly concerned with re-classifying the SMCA to an SMR; however, we explained that we are also considering some other options. We have listed some alternative ideas below, that we ask CDFW staff to review.

Coastal Band of the Chumash Nation – the Band is supportive of modifying Anacapa SMCA to allow for the eelgrass meadow to be undisturbed and protected from lobster traps. We have spoken with the Secretary of the Coastal band and an Elder who have helped connect us with the President for further discussion. We hope to hold a further conversation in the beginning of August.

Barbareño Band of Chumash Indians – EDC sent information on the MPA petition and DMR process, the original Anacapa petition narrative, and the narrative for the creation of Mishopshno SMCA. We are waiting for their review and an opportunity to discuss the petitions.

Wishtoyo Chumash Foundation – EDC sent information on the MPA petition and DMR process, the original Anacapa petition narrative, and the narrative for the creation of Mishopshno SMCA. We are waiting for their review and an opportunity to discuss the petitions.

D. Local Community

College students – We spoke with CalPIRG students as well as those who did not identify any affiliation to an environmental/marine conservation club. The University of California, Santa Barbara students, especially those that have been to the islands, are generally supportive of the MPA Network and communicated a strong desire to continue to protect the ocean via MPAs. They were supportive of protecting eelgrass at Anacapa Island SMCA.

Women in the Water – EDC participated in a gathering held by Women in the Water, for local women-identified and allied people who are connected by the water. We heard general support for the MPA Network from a group of about 30 Santa Barbara County locals. Many had questions about the petition process.

Santa Barbara Channel MPA Collaborative – EDC attended a meeting in late spring/early summer of this year. We heard concerns from several fishermen who believed that a concession was made during the initial conversations to establish the Network. They referenced a deal that resulted in the designation of the Campus point MPA rather than an MPA near Carpinteria. They voiced concerns that closing access near the Carpinteria State Beach would push fishing efforts into Ventura County or surrounding the Santa Barbara port. General support for the Network was expressed, however during the meeting, individual petitions were not discussed.

E. Agencies

We also spoke with multiple state and federal agencies, most notably the National Oceanic and Atmospheric Administration ("NOAA"), the National Park Service ("NPS"), and CDFW. Most agency staff were open to EDC's new alternatives and expressed the need for more direction from the Commission as to how to change the original petition request.

II. POTENTIAL SOLUTIONS

As stated above, the FGC directed petitioners in late 2023 to prioritize community outreach. We were tasked with engaging the community to inform them of individual petitions to best inform our petition requests. EDC, like many petitioners, set about our task and occasionally combined efforts with other organizations to conduct community outreach. EDC conducted many conversations that led us to investigate alternative solutions that would still protect *Zostera marina* at Anacapa Island, as there is compelling evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying the eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR. Another goal petitioners, as well as CDFW and FGC, must engage in is adaptive management. As explained in the DMR, "adaptive management is an iterative process that facilitates learning from program actions to help determine those that are most effective."[1] Utilizing one of EDC's suggested solutions - or ones identified by CDFW in the future - will align with recently available scientific findings about the significant damage

[1] California Department of Fish and Wildlife. (2022). California's Marine Protected Area Network Decadal Management Review.

caused by lobster traps and boat anchoring, thus supporting adaptive management goals. We ask that CDFW staff evaluate the below alternatives (and others not listed here) that we have crafted from our community outreach and engagement.

A. Change current regulations to disallow lobster fishing year round

The species of eelgrass found at Anacapa Island, *Zostera pacifica*, has very short rootlets and typically grows within the top few centimeters of sediment.[2] This makes it extremely sensitive to disturbance, which is why it is found only in the most sheltered areas. Deploying and pulling hard bottomed items, like lobster traps and boat anchors, disturbs the sediment and dislodges the eelgrass and causes it to drift away.[3] Deploying and pulling traps is akin to anchoring, which is known to be a major threat to eelgrass beds world-wide. Due to the site-specific research conducted by Jessie Altstatt,[4] it is apparent that lobster traps are the biggest threat to Anacapa Island SMCA eelgrass meadows. We ask that CDFW evaluate the benefits and challenges that would come with changing the regulations for Anacapa Island SMCA to prohibit lobster fishing year-round.

B. Change current regulations to disallow hard bottomed fishing gear near eelgrass meadows

Similar justifications to alternative A can be applied to alternative B as well. We ask CDFW staff to evaluate the benefits and challenges of changing the regulations to restrict the gear type allowed for commercial lobster fishers. We recommend that a non-hard bottomed trap be evaluated for use at locations with sensitive eelgrass habitats.

C. Change the existing border, prohibiting the deployment of lobster traps from 0-20 feet to 0-30 meters

Eelgrass beds support complex food webs despite inhabiting a narrow range. They filter nutrients, and improve water quality, stabilize sediments, and serve as important refuge and nurseries for marine vertebrates and invertebrates.[5] Eelgrass beds are typically found from shallow waters down to depths of up to 30 meters (98 feet).[6] Based on the existing border around Anacapa Island as explained in the Final Environmental Document for Marine Protected Areas

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[2] Engle, J. M., & Miller, K. A. (2005). Distribution and morphology of eelgrass (Zostera marina L.) at the California Channel Islands. In *Proceedings of the Sixth California Islands Symposium. Institute for Wildlife Studies, Arcata, CA* (pp. 405-414).
[3] Richardson Bay: Eelgrass Restoration and Adaptive Management Plan (2023) https://rbra.ca.gov/files/38481beeb/8.2.1_2024-01-10_RAMP.pdf
[4] Jessica Altstatt (2021). Island Eelgrass (*Zostera pacifica*): Focused Assessment of Condition and Extent of Meadows and Biological Monitoring of Associated Fish and Invertebrate Communities
[5]Engle, J. M., & Miller, K. A. (2005, November). Distribution and morphology of eelgrass (Zostera marina L.) at the California Channel Islands. In *Proceedings of the Sixth California Islands Symposium. Institute for Wildlife Studies, Arcata, CA* (pp. 405-414).
[6] marinespecies.wildlife.ca.gov/eelgrass/

in NOAA's Channel Islands National Marine Sanctuary: Volume I,[7] we ask CDFW to evaluate the benefits and challenges to changing the distance from 20 ft to 30 meters within Anacapa Island SMCA, or for the whole Island.

III. POACHING: IS IT AN ISSUE?

Given its ecological importance, eelgrass habitat restoration and conservation has been identified as a high priority by numerous federal and state policies and planning documents. Most community members surrounding Santa Barbra Channel are concerned about the environment, including marine ecosystems. Everyone we spoke with voiced some concern for the eelgrass meadows and the fishing pressure occurring within the SMCA. Many times, poaching as an issue was brought up in our conversations. This is not something EDC was able to determine with certainty and if it is as big an issue as some think, despite the endeavors we take to change the regulations, poaching will destroy those efforts. We ask that CDFW staff (if not already) compare the number of traps deployed to the number of permits to fish in the area to determine if poaching is a major concern at Anacapa Island.

IV. CONCLUSION

We celebrate the outcome of the DMR and the actions the FGC as well as CDFW have taken to center adaptive management in ongoing processes. The ecological benefits of eelgrass habitat and of fully protected areas allow for a higher abundance of commercially important species and can better support climate adaptation and resilience.[8,9] As the MPA Petition process evolves, we ask that CDFW staff and FGC evaluate the new alternatives listed in this letter when reviewing our Anacapa Island Petition (2023-27MPA).

Thank you for your consideration of our comments.

Sincerely,

Azsha Hudson
Marine Conservation Analyst & Program Manager

[7] Ugoretz, John. (2002). Final 2002 environmental document : marine protected areas in the National Oceanic and Atmospheric Administration's Channel Islands National Marine Sanctuary (sections 27.82, 630 and 632 Title 14, California code of regulations).
[8] Front Ecol Environ 2018; 16(7): 381–387, doi:10.1002/fee.1934
[9] Roberts, C. M., O'Leary, B. C., McCauley, D. J., Cury, P. M., Duarte, C. M., Lubchenco, J., ... & Castilla, J. C. (2017). Marine reserves can mitigate and promote adaptation to climate change. *Proceedings of the National Academy of Sciences*, *114*(24), 6167-6175.

Please Strengthen And Expand California's Marine Protected Area Network

David Jens Thomas Pedersen <[redacted]>
Sat 08/03/2024 10:00 PM
To:FGC <FGC@fgc.ca.gov>

Dear California Fish and Game Commission,

I respectfully submit these comments to urge you to strengthen California's network of Marine Protected Areas (MPAs). Specifically, I ask that you please add two new MPAs to the existing network: Point Sal State Marine Reserve, and Mishopshno State Marine Conservation Area. These two areas are ecologically rich and would provide significant science-based benefits to the overall health of our marine areas. The Mishopshno MPA would be strategically located in order to create greater connectivity for the whole network. In addition, both proposed MPAs have historic cultural significance for the Chumash people. On top of creating these new MPAs, I also ask that you please strengthen protections for and in the existing network by restricting or prohibiting activities that are shown to harm or risk harming the health of the network to ensure its longevity and availability as a resource to all.

Research on California's MPA network shows fish are larger and more abundant inside many of the protected areas, four-fifths (of the ones analyzed in the studies) had healthier populations than compared to unprotected areas, and the overall network had more coral, sponges, and other animals that are significantly associated with thriving habitats. While It is clear that we're seeing initial progress and that the existing protections are effective and work to benefit the overall health of our ocean, we must protect the existing network and go further to unlock the full potential benefits of the network.

Accordingly, I respectfully you to maintain California's status as an ocean conservation champion, especially in the face of ocean industrialization, marine crowding, and climate change. The ocean is a dynamic, constantly changing system with a bevy of uncertainties, which necessitates the adaptive management of MPAs to durably protect our shared marine resources.

Thank you for your time and consideration.

Regards,

David Pedersen

[redacted]

[redacted]

From: Erin Eastwood <[redacted]>
Sent: Friday, February 28, 2025 4:21:06 PM
To: FGC <FGC@fgc.ca.gov>
Subject: Written Comment for March 13 MRC Meeting

Hello,

Please see the written comment from the Santa Ynez Band of Chumash Indians, Environmental Defense Center, and the Natural Resources Defense Council, attached. Thank you for your consideration.

--

Erin Eastwood

Founder and Principal

Blue Spark Strategies, LLC

[redacted]

[redacted]

February 28, 2025

Samantha Murray, Vice President
California Fish and Game Commission
715 P Street, 16th Floor
Sacramento, CA 95817

Submitted electronically to fgc@fgc.ca.gov

RE: Comments on Fish and Game Commission Marine Resources Committee March 2025 Meeting Agenda Item 5 A II: *MPA Regulation Change Petitions*

Dear Vice President Murray and Commissioner Sklar:

The Natural Resources Defense Council (NRDC) submitted two petitions to designate new Marine Protected Areas (MPAs) in Santa Barbara County:

- Petition 2023-28-MPA proposes a new MPA in the waters surrounding Point Sal.
- Petition 2023-29MPA, submitted with the co-sponsors, Santa Ynez Band of Chumash Indians (SYBCI) and Environmental Defense Center (EDC), proposes a California-Chumash co-managed MPA off the coast of Carpinteria to be named Mishopshno.

For each petition, we conducted initial outreach during late Summer and Fall 2023 before submission to the Commission. More sustained outreach efforts began upon the petitions' formal acceptance by the Commission in December 2023. We provided an update on our outreach in July 2024, and this letter will describe our subsequent outreach efforts.

Since January 2024, our two organizations and Tribal nation have conducted over 100 meetings and phone calls with stakeholders and community members. Many of the meetings since July 2024 are follow up meetings where we have solicited feedback on the proposed boundaries and regulations and worked to build support for the petitions and address concerns with the proposals. Since the July update, we have conducted additional outreach to local Tribal members and organizations, local fishing representatives, elected officials, and local businesses and community members. We have attended community meetings, fishing association meetings, and hosted public webinars to reach and hear from as many stakeholders as possible. We plan to submit amendments for both of our petitions to the Fish & Game Commission by the March deadline. These amendments will reflect the discussions we have had with Tribes and fishers.

Throughout this process, we have prioritized 1) connecting with the local community, 2) responding to questions, ideas, and concerns, and 3) sharing information as broadly as possible so all interested parties can come to the table to inform upcoming decision-making moments. For the Mishopshno petition in particular, SYBCI, EDC, and NRDC have undertaken our outreach efforts as a team.

We have shared the following types of information throughout our outreach efforts:

- Background on the MPA Network, Marine Life Protection Act goals, Decadal Management Review and its findings, and the latest science

- Fish and Game Commission meeting updates
- MPA petition evaluation timeline and process updates
- Opportunities for public participation
- Research and outreach findings
- MPA petition details

Throughout our outreach, our organizations and Tribal nation have connected with hundreds of interested individuals via email, phone calls, and virtual and in-person meetings, including:

- Federally and non-federally recognized Tribes
- Tribal non-profit organizations
- City Council members, District Supervisors, Mayors, city staff
- Congressional, Assembly, and Senate offices and district staff
- Local and State agencies (i.e., Santa Barbara Flood Control District, Santa Barbara County Parks, State Parks, etc.)
- Local businesses
- Local scientists
- Commercial fishing representatives
- Local recreational fishers (e.g., spearfishers, catch-and-release fishers)
- Local homeowners
- Local, state, and national non-profit organizations
- Youth
- Community centers

These conversations have improved our understanding of the Carpinteria and Point Sal regions, highlighted community support for protecting the coastal waters in those areas and concerns about how it is done, shaped our supplemental site-specific research, and informed our verbal and written public comments to the Commission. We hope the insight and supplemental information gathered through our outreach efforts maximize each petition's potential to strengthen our MPA Network.

In the coming months, we hope to build on the connections we've made thus far and to engage with key stakeholders and members of Tribal nations we haven't yet reached. We look forward to sharing our outreach and supplemental research findings with the CDFW and FGC teams to inform the evaluation of petitions 2023-28MPA and 2023-29MPA.

Thank you for the opportunity to weigh in on the adaptive management of California's MPA Network.

Sincerely,

Sandy Aylesworth
Director, Pacific Initiative, Nature
Natural Resources Defense Council

Sam Cohen
Government Affairs and Legal Officer

Santa Ynez Band of Chumash Indians

Azsha Hudson
Marine Conservation Analyst & Program Manager
Environmental Defense Center

From: California Surf Fishing <[redacted]>
Sent: Saturday, March 1, 2025 07:18 AM
To: FGC <FGC@fgc.ca.gov>
Subject: Sign-On Letter for the Mishopshno SMCA

Greetings! This is Kaspar Kazazian from www.californiasurffishing.net. After engaging with communities through the following outreach methods, we express support for the Mishopshno SMCA.

1. We worked with all of the Mishopshno petition co-sponsors as well as Fish On Conservation to build a consensus.

2. We had conversations with 6 experienced shore fishermen who frequently fish the Carpinteria area and are familiar with the different fishing areas. These were trusted individuals, many that we already knew as local fishermen and have fished with numerous times. Coupled with our knowledge of fishing the area over the years, we obtained a complete picture of what fishermen fish for in each of the beaches in the SMCA. We aim to respect all types of low impact fishing in this SMCA: Subsistence fishermen (croakers and perch at Carpinteria Beach and Santa Claus Beach), halibut fishermen (in the mixed sand and reef of Padaro / Loon Point, mostly catch and release), inlet fishermen (by Sand Point, for stripers, etc), Kayak fishermen (at the nearby offshore Carp Reef).

3. Through our social media page, we obtained ~1,000 signatures for fishermen's support of shore fishing in SMCA's, such as the Mishopshno SMCA:
https://www.change.org/p/allow-shore-fishing-in-smca-s

4. We support the petition to create the Mishopshno SMCA for the following reasons:
-Meet original scientific MPA connectivity guidelines by filling the gap that currently exists. We believe that filling this MPA connectivity gap will increase fish populations, benefitting both fishermen and the fish.
-Of all types of ocean fishing, recreational shore fishing and kayak fishing offer the lowest cost, the easiest access, and the least environmental impact to fish / kelp forests. From an equity perspective, shore fishing can be enjoyed by a diverse range of communities who are within driving distance to the coastline.
We believe that allowing recreational shore fishing and kayak fishing in SMCA's is in alignment with the state's Marine Life Protection Act (Goal #3 for recreation) and MPA Decadal Management Review (Recommendation #7 & #9 for equity & accessibility).
-The creation of this highly protected SMCA (in alignment with low impact fishing gear

criteria per the MPA Guide User Manual) will strengthen the state's MPA network, per state goals, including 30x30.

Sincerely,

Kaspar Kazazian

California Surf Fishing

www.californiasurffishing.net

From: [redacted]
Sent: Sunday, March 16, 2025 01:43 PM
To: FGC <FGC@fgc.ca.gov>
Subject: 2023-29MPA Mishopshno State Marine Conservation Area

ATTN: Fish & Game Commission

My name is William Ray, from Carpinteria, CA. I'm writing to you today with comments about 2023-29MPA: Mishopshno State Marine Conservation Area.

I am writing to express my strong opposition to the proposed Marine Protected Area (MPA) designation for Carpinteria Reef. As a graduate student at UCSB specializing in benthic ecosystem research, I dive at Carpinteria Reef approximately 100 times per year and have firsthand knowledge of its ecological health and the role it plays in the local community. The arguments presented in favor of this MPA lack scientific justification and fail to consider the significant negative impacts it would have on the residents who rely on this area for subsistence fishing, research, and recreation.

Lack of Scientific Justification for MPA Designation

Proponents of the MPA claim that it will provide protection for juvenile white sharks. However, white sharks are already illegal to fish in California, making additional protections redundant. There is no evidence to suggest that an MPA would enhance their conservation beyond existing regulations.

Additionally, arguments citing "spillover effects" for commercially and recreationally important species such as lobster and rockfish are scientifically flawed in this context. Spillover effects occur when protected populations expand into adjacent fishable areas, but Carpinteria Reef is one of the only accessible reef structures in this section of coastline. With no significant adjacent reef habitats, the premise that an MPA here would enhance fisheries through larval dispersal or adult migration is unsupported. Furthermore, local hydrodynamics at Carpinteria Reef differ from other regional sites; currents here are primarily tide-driven rather than advection-based, making claims of larval transport benefits highly questionable.

Disproportionate Impact on Underrepresented Communities

Carpinteria is a diverse community, home to one of the largest and most densely populated

Hispanic populations in the Tri-County area. Many low-income families depend on this reef as a vital source of fresh, sustainable protein, particularly given the high cost of living. Restricting access to this resource would disproportionately impact these underrepresented communities while providing no demonstrated ecological benefit.

Additionally, while the proposal emphasizes increasing access for Native American communities, it does not explain how restricting public access achieves this goal. True inclusivity should focus on increasing opportunities for all local communities, not implementing exclusionary policies.

Sincerely,

William Ray

From: Kyle Murphy <[redacted]>
Sent: Sunday, March 16, 2025 07:44 PM
To: FGC <FGC@fgc.ca.gov>
Subject: 2023-29MPA: Mishopshno State Marine Conservation Area

ATTN: Fish & Game Commission

My name is Kyle Murphy, from Carpinteria, CA. I'm writing to you today with comments about 2023-29MPA: Mishopshno State Marine Conservation Area.

It is upsetting to hear about the proposed area between Carpinteria and Summerland becoming a Marine Conservation Area. This beautiful coastline with accessible reef structures close to shore offers the closest experience one can take part of in relation to the Channel Islands. If you don't own a boat like myself, Carpinteria reef specifically, is the closest experience of spearfishing/diving one can take part of with its offered kelp forest, rocky reef substrate, and diverse marine ecosystem. Carpinteria reef is an important resource to myself and my community. It allows for one to be in touch with nature in which one can forage their own food under the proper restrictions and guidelines implemented by Fish and Game. I take pride in myself and others who go out of their way to forage for food locally versus buying fish/invertebrates from the store, not knowing where they came from, not knowing if they were fished sustainably, and not knowing if they where marinated in chemicals/preservatives to extend their shelf life. Myself and others treat our next meals with the upmost respect.

Unfortunately, there are no other nearby reefs on this whole coastline that are accessible with the "spill over" benefits of this MPA. In terms of the juvenile white sharks needing protection, these marine vertebrates are already illegal to fish, so they don't need more protecting. I'm definitely for support of Tribal co-management of this area, however, increasing the access for one community doesn't have to be by excluding all the other users.

I hope you take my comments of this matter into consideration for not making this area into an Marine Conservation Area.

ROY LEE
First District Supervisor

BOARD OF SUPERVISORS
County Administration Building
105 East Anapamu Street
Santa Barbara, CA 93101
Telephone: (805) 568-2190
www.countyofsb.org

COUNTY OF SANTA BARBARA

April 15, 2025

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

Re: Support for Petitions 2023-28MPA and 2023-29MPA

Dear President Zavaleta and Honorable Commissioners:

I am writing in 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. A healthy ocean is the heartbeat of Santa Barbara County – residents, and visitors alike rely on our pristine waters, inviting beaches, and safe and accessible recreation. 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.

Conserving Point Sal and Mishopshno MPAs will have powerful ripple effects:

- Conserve important habitats that support rich biodiversity such as kelp forests, rocky reefs, tidepools, sandy beaches, migratory whale corridors, important larval retention zones, and a seabird and sea lion rookeries.
- Bolster ocean resilience to keep our coastal waters healthy
- Encourage accessible recreation by local and visiting hikers, surfers, shore fishers, swimmers, kayakers, birdwatchers, beach walkers, and families of all ages.
- Create safe and sustainable conditions for commercial fishers
- Honor and strengthen the Chumash peoples' stewardship of the area and elevate their historical and present-day connection to the region.

The support for these two MPAs is well researched and representative of many interests. The Natural Resources Defense Council (NRDC), alongside the Santa Ynez Band of Chumash Indians and the Environmental Defense Center, conducted extensive outreach and research regarding the MPAs throughout Santa Barbara County. Since December 2023, the coalition has held over 100 meetings with Tribes, fishers, scientists, local leaders, and community members to gather input, share information, and refine proposals. Their outreach included webinars, public meetings, and direct engagement, emphasizing transparency and collaboration. These efforts

have informed petition amendments and supplemental research, ensuring both ecological goals and community priorities are reflected.

In response to feedback, the coalition modified proposed boundaries and regulations to address fishing concerns, Tribal perspectives, and local economic impacts—ensuring the petitions reflect both science and community values.

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. And that's a huge boon to the economy – collectively, ocean-based recreational activities contribute to our state's $28 billion ocean tourism and recreation economy.[1] In 2023, coastal tourism brought just over $2 billion in travel-related spending to Santa Barbara County, and supported more than 20,000 jobs.[2]

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 our strong support for these proposals that aim 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.

Respectfully,

Roy Lee
Supervisor, First District
Santa Barbara County

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

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

From: Langenhuizen, Gunnar <[redacted]>
Sent: Monday, May 19, 2025 09:08 AM
To: FGC <FGC@fgc.ca.gov>
Cc: Aylesworth, Sandy <[redacted]>; Azsha Hudson <[redacted]>
Subject: Office of Asm. Hart - Mishopshno & Point Sal MPAs

Hello,

Please see the attached letter from Assemblymember Hart regarding the petitions to establish the Mishopshno State Marine Conservation Area and the Point Sal State Marine Conservation Area. Thank you for your consideration of these petitions and please let me know if you have any questions of our office.

Best,

Gunnar

Gunnar Langenhuizen (He/Him/His)

Field Representative

Assemblymember Gregg Hart – AD37

Phone

[redacted]

Email

[redacted]

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0037
(916) 319-2037
DISTRICT OFFICES
101 WEST ANAPAMU STREET, SUITE A
SANTA BARBARA, CA 93101
(805) 564-1649
1111 SOUTH BROADWAY, SUITE 101
SANTA MARIA, CA 93454
(805) 346-1237
EMAIL: Assemblymember.Hart@assembly.ca.gov

Assembly
California Legislature

GREGG HART
ASSEMBLYMEMBER, THIRTY-SEVENTH DISTRICT

COMMITTEES
APPROPRIATIONS
BUDGET
TRANSPORTATION
UTILITIES AND ENERGY
WATER, PARKS, AND WILDLIFE
CHAIR, BUDGET SUBCOMMITTEE NO. 7
ON ACCOUNTABILITY AND OVERSIGHT
JOINT LEGISLATIVE AUDIT COMMITTEE

May 15, 2025

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

Re: Support for Marine Protected Areas in Santa Barbara County

Dear President Zavaleta and Honorable Commissioners:

I am writing to request your full and fair consideration of the petitions to establish the Mishopshno State Marine Conservation Area (Petition 2023-29MPA) and the Point Sal State Marine Conservation Area (Petition 2023-28MPA) in my district. Approving these petitions along the Central Coast would reinforce the California Fish and Game Commission's commitment to maintaining, enhancing, and strengthening the integrity of the Marine Protected Area (MPA) network and the vital protections it provides, as directed by Assembly Concurrent Resolution 210.

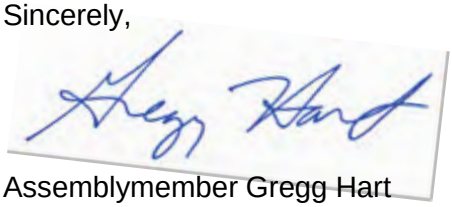
As the climate continues to change, we must act to protect sensitive areas and ecosystems both on land and in water. The California Legislature codified Governor Newsom's 30x30 Executive Order through SB 337, which calls for the state to conserve 30% of its state lands and waters by 2030. Adding new MPAs such as Mishopshno and Point Sal will help California advance its biodiversity, Tribal co-management, and equity goals associated with 30x30.

California's MPA network is a globally recognized success. It is now in the final stages of review for inclusion on the International Union for Conservation of Nature's "Green List," which would make it the first Green Listed site in the United States and the first scientifically designed MPA network ever included. The Channel Islands network was the recipient of the Marine Conservation Institute's prestigious Blue Parks Award in 2019. California has a strong history of protecting land and marine resources while advancing new ocean industries to help mitigate the climate crisis, and these MPAs align directly with those goals.

Spatial management tools, such as MPAs with high levels of protection, will help safeguard our ocean against existing and future stressors. The MPA adaptive management process creates an opportunity to revitalize parts of California's coast by supporting larger, more abundant fish populations and conserving critical habitats and marine wildlife.

For these reasons, I respectfully request your full and fair consideration of Petitions 2023-29MPA and 2023-28MPA to establish the Mishopshno and Point Sal State Marine Conservation Areas.

Sincerely,



Assemblymember Gregg Hart

From: Kelsey Maloney <[redacted]>
Sent: Tuesday, June 24, 2025 8:44 AM
To: FGC <FGC@fgc.ca.gov>
Subject: Support for MPAs

Good morning,

I am writing to urge the Commission to approve petitions 2023-29MPA in Carpinteria and 2023-27MPA at Anacapa Island. We have an obligation to protect marine life. We will all be healthier with a thriving marine ecosystem. With so much of public lands and waters at risk of being sold off or used for drilling oil, and with the threat of climate change, it is more important than ever to protect marine life and natural resources. As a swimmer and beach goer, I cherish these spaces and encourage you to help protect these vital marine resources.

Thank you,

--

Kelsey Maloney (she/her)

Grant Writer

[redacted]

From: Jean Kaplan <[redacted]>
Sent: Tuesday, July 1, 2025 10:07 AM
To: FGC <FGC@fgc.ca.gov>
Subject: Marine Sanctuaries

I am

I am requesting the designation of petitions 2023-27MPA and 2023-29MPA, along with your personal support for these petitions.

WE NEED YOUR VOICE!
Please join EDC and our partners in urging the Commissioners to designate two petitions critical to enhancing the MPA network and providing critical protection for our marine resources.

WAYS TO JOIN US
July 16-17th
Marine Resources Committee Hearing

- **IN-PERSON (Agenda)**
  California Natural Resources Headquarters Building
  Second Floor, 715 P Street
  Sacramento, CA 95814
- **VIRTUALLY**
  The FGC will update the meeting documents1.5-2 weeks before the meeting date (tentatively should be updated on/around July 1,2025). Please use this link to check the FGC website for instructions on how to join virtually and comment at the meeting.
- **EMAIL YOUR COMMENTS BY JULY 3, 2025**
  Submit written commenbts to**fgc@fgc.ca.gov**

TALKING POINTS:

- I urge the Commission to approve petitions 2023-29MPA in Carpinteria and 2023-27MPA at Anacapa Island.
- The Carpinteria petition, named Mishopshno (Mee – shop – shno) is to create a new MPA that will fill a 64-mile spacing gap between Campus Point and Point Dume MPAs which will better enhance network connectivity.
- Mishopshno will also protect kelp forest, rocky reef, sandy bottom, and sandy beach habitat, which is essential to kelp bass, rockfish, octopus, spiny lobster, egrets, whales, dolphins, and more.
- The Anacapa Island petition will improve protection for restored eelgrass meadows from the impact of commercial lobster traps, conserving an important habitat that is increasingly diminished and impacted by human activities.
- Adjustments to the existing Anacapa Island State Marine Conservation Area will also improve the current MPA network via adaptive management as directed by the Marine Life Protection Act

Thank you for speaking up on this important issue and helping protect these vital marine resources.

Azsha Hudson
Marine Conservation Analyst and Program Manager

Sent from my iPhone

July 31, 2025

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

Re: <u>Agenda Item 17C: Community Outreach Update re Petitions 2023-27MPA and 2023-29MPA</u>

Dear President Zavaleta and Honorable Commissioners:

In late 2023, the Fish and Game Commission (FGC) requested that the public submit petitions for any changes to the Network to advance adaptive management Recommendation 4, "Apply what is learned from the first Decadal Management Review to support proposed changes to the MPA Network and Management Program." EDC submitted two Marine Protected Area (MPA) petitions in Santa Barbara/Ventura County:

- Petition 2023-27MPA proposes to reclassify a State Marine Conservation Area (SMCA); and
- Petition 2023-29MPA, submitted with the co-sponsors, Santa Ynez Band of Chumash Indians (SYBCI) and NRDC, proposes a California-Chumash co-managed MPA off the coast of Carpinteria to be named Mishopshno.

FGC additionally directed petitioners to prioritize community outreach following the deadline for petition submissions. We at EDC, SYBCI, and NRDC have been working to inform our local communities of the MPA adaptive management process, as well as relevant petitions (for this letter the petitions being addressed moving forward will be those listed above), and have continued to engage the community since we submitted our petition in November 2023.

Since January 2024, the Environmental Defense Center (EDC), the Santa Ynez Band of Chumash Indians (SYBCI), and the Natural Resource Defense Council (NRDC) have conducted over 100 in-person and virtual or meetings and phone calls with stakeholders and community members.[1] As part of our joint efforts to inform and engage the community, we attended multiple community events with tabling opportunities sharing the petitions with community members and asking for their support of the MPA Network and to sign on in support of the two petitions. Over the summer of 2023, we garnered over 150 postcards from community members in support of the petitions.

The postcards read:

> "Dear Fish & Game Commissioners,
>
> I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.
>
> Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users."

The outreach we conducted via tabling in Ventura and Santa Barbara counties adds to our overall outreach efforts in the community to inform and educate. Our individual and joint efforts have led to conversations with hundreds of interested individuals via email, phone calls, tabling events, and virtual and in-person meetings, including:

- Federally and non-federally recognized Tribes
- Tribal non-profit organizations
- City Council members, District Supervisors, Mayors, city staff
- Congressional, Assembly, and Senate offices and district staff

[1] Please refer to both the July 31st, 2024 comment letter submitted by EDC titled, "Petition for Anacapa State Marine Conservation Area – Agenda Item 6(c)" and the February 28, 2025 comments submitted by NRDC titled, "Comments on Fish and Game Commission Marine Resources Committee March 2025 Meeting Agenda Item 5 A II: MPA Regulation Change Petitions" for more context on our combined outreach efforts.

- Local and State agencies (i.e., Santa Barbara Flood Control District, Santa Barbara County Parks, State Parks, etc.)
- Local businesses
- Local scientists
- Commercial fishing representatives
- Local recreational fishers (e.g., spearfishers, catch-and-release fishers)
- Local homeowners
- Local, state, and national non-profit organizations
- Youth
- Community centers

As the petition process continues towards completion, we remain dedicated to our continued community engagement, hoping to build on the connections we've made thus far. We look forward to sharing our outreach and supplemental research findings with the CDFW and FGC teams to inform the evaluation of petitions 2023-27MPA and 2023-29MPA.

Thank you for the opportunity to weigh in on the adaptive management of California's MPA Network.

Sincerely,

Azsha Hudson
Marine Conservation Analyst
Environmental Defense Center

Sam Cohen
Government Affairs and Legal Officer
Santa Ynez Band of Chumash Indians

Sandy Aylesworth
Director, Pacific Initiative, Nature
Natural Resources Defense Council

Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

JEREMY LAMB

[redacted]

(Email)

[redacted]

(Address)

SANTA BARBARA, CA 93101

(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Yareli Solis

(Print name)

[redacted]

[redacted]

(Email)

SB, CA 93101

(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Alexandra Heffner [redacted]

(Print name) (Email)

[redacted]

(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Robert Demetriou

[redacted]

(Email)

[redacted]

(Address)

Ojai, CA 93023

(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

ADAM Lenhard
(Print name)

[redacted]
(Email)

(Address)

Ventura
(City, State, Zip)

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Please Protect Our Ocean

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I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

MAHOMED KHAN

(Print name)

[redacted]

(Email)

(Address)

LOS ANGELES

(City, State, Zip)

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Please Protect Our Ocean

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Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Steven Libowitz

(Print name)

[redacted]

(Email)

(Address)

SB CA 93101

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Brenda Major [redacted]

(Print name) (Email)

[redacted] 93103

(A (City, State, Zip)

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Please Protect Our Ocean

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Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Marilynn Brewer
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Santa Barbara, CA 93101
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Gerardo Ayala
(Print name)

(Address)

(Email)

Santa Barbara, CA 93103
(City, State, Zip)

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Please Protect Our Ocean

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I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Sara Bazan
(Print name)

[redacted]
(Email)

(Address)

Santa Barbara, 93103
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Andrea Sperling
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Pismo Beach, CA, 93449
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

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Sincerely,

John Reed
(Print name)

[redacted]
(Email)

[redacted]
(Address)

SB, CA 93116
(City, State, Zip)

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Please Protect Our Ocean

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I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

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Sincerely,

Lily Poehler
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Santa Barbara CA 93110
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Milly Beeber [redacted]

(Print name) (Email)

[redacted] Santa Barbara, CA 93103

(Address) (City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Sincerely,

Harriet Eckstein [redacted]

(Print name) (Email)

[redacted] Santa Barbara CA 93101

(Address) (City, State, Zip)

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Photo Credit: Brett Seymour, NPS

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Sincerely,

Yalda Khodadad
(Print name)

[redacted]
(Email)

[redacted]
(Address)

SB, CA, 93103
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Kady Burke

(Print name)

[redacted]

(Email)

(Address)

(City, State, Zip)

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Photo Credit: Brett Seymour, NPS

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Sincerely,

Beverley Beitsch

(Print name)

[redacted]

(Email)

[redacted]

(Address)

Goleta, CA 93117

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Rachel Brady
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta, CA, 93117
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Aidaly Xicotencatl

(Print name)

[redacted]

(Address)

[redacted]

(Email)

Colton Ca, 92324

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Charles Mugler

(Print n[redacted]

(Email) [redacted]

(Address) [redacted]

SM Ca

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Sincerely,

Erika Zollett
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta, CA 93117
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

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Sincerely,

HUGH KELLY
(Print name)

[redacted]
(Email)

(Address)

SANTA BARBARA
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

INGE ROSE

(Print name)

[redacted]

(Email)

[redacted]

(Address)

SB 93109

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

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Sincerely,

Mariam Garcia
(Print name)

[redacted]
(Email)

(Address)

(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Hazel Vaquero
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Santa Barbara, 93106
(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Patricia Park
(Print name)

(Email)

(Address)

Goleta, CA, 93117
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

HAZEL Studstill
(Print name)

[redacted]
(Email)

[redacted]
(Address)

GOLETA CA 93117
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Clifford Ghersen
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Santa Barbara, CA. 93108
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Angelica Ace

(Print name)

[redacted]

(Address)

[redacted]

(Email)

SB CA 93110

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Dalia Khan

[redacted]

(Address)

(Email)

Santa Barbara, CA 93101

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Melody Angkor [redacted]

[redacted] (Email)

[redacted] (Address)

Santa Barbara, CA, 93101 (City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Kathleen Modugno [redacted]

(Print name) (Email)

[redacted] SB. 93109

(Address) (City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Camila Erickson
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Isla Vista
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Douglas Myers
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Apple Valley, CA 92307
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Jan Myers

(Print [redacted])

[redacted]

(Email)

(Address)

Apple Valley, CA 92307

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Michael Purvis

(Print name)

[redacted]

(Address)

[redacted]

(Email)

Santa Barbara 93101

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

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Sincerely,

NANCY COLLINS

(Pri[redacted]

(Address)

[redacted]

(Email)

Santa Barbara, 93101

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Cheryl Gring

(Print name)

[redacted]

(Address)

[redacted]

(Email)

Carpinteria CA 93013

(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Dr. Linda Phillips
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Santa Barbara, CA 93111
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Kathy Henry

(Print name)

[redacted]

(Email)

SB CA 93101

(Address) (City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Por favor proteja nuestro océano

Estimados Comisarios de Pesca y Caza:

Les escribo para instarles respetuosamente a que aprueben dos peticiones de Áreas Marinas Protegidas (MPA, por sus siglas en inglés). Peticiones: 1) MPA Mishopshno, que crearía una nueva Área de Conservación Marina Estatal (2023-29MPA) (SMCA, por sus siglas en inglés); y 2) MPA Anacapa, que reclasificaría una SMCA a Reserva Marina Estatal (SMR, por sus siglas en inglés) (2023-27 MPA). La creación de una nueva MPA frente a la costa de Carpintería ayudará a cumplir con las directrices científicas para el espaciamiento entre hábitats protegidos, promoviendo la conectividad en la red de AMP y la representación de tipos de hábitat. También protegerá hábitats atractivos para la vida silvestre, como los tiburones blancos juveniles, y permitirá un mejor acceso a la costa y a los recursos marinos para fines tradicionales, ceremoniales, culturales y de subsistencia para la tribu Banda de los Indios Chumash de Santa Ynez, -reconocida federalmente. La reclasificación de Anacapa SMCA a SMR protegerá mejor el hábitat de pastos marinos, ya que hay evidencia de que la captura y el anclaje estacional de langosta en el SMCA está destruyendo lechos de pastos marinos que de otro modo prosperarán en el Anacapa SMR adyacente.

Autor de la foto: Brett Seymour, NPS

Haga lo correcto para nuestra comunidad y proteja la biodiversidad única de nuestro océano para las futuras generaciones de usuarios del océano.

Atentamente,

Denise Umland
(Nombre en letra imprenta)

[redacted]
(Dirección)

[redacted]
(Correo electrónico)

SB CA 93103
(Ciudad, Estado, Código postal)

Al firmar este documento, acepta recibir actualizaciones de Environmental Defense Center.

Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Nathan A Sara
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Santa Barbara CA 93110
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Ryan Asaro
(Print name)

[redacted]
(Email)

(Address)

San Diego CA, 92130
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Karen Oliver
(Print name)

[redacted]
(Email)

(Address)

Sarasota FL 34241
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Paige Caras [redacted]

(Print name) (Email)

[redacted] Santa Barbara, CA 93109

(Address) (City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

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Sincerely,

Shawn Velarde

(Print) [redacted]

(Address)

[redacted]

(Email)

Ventura, CA 93003

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Jamie Diaz
(Print name)

[redacted]
(Email)

(Address)

SB, CA
(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

MARY SOLIS

(Print name) [redacted] (Email)

[redacted] 93105

(Address) (City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Patricia Rose
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Carson, CA 90745
(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Eduardo Romero
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Santa Barbara CA 93103
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Norma Uriarte
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Santa Barbara, CA 93105
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Lauren Harris
(Print name)

[redacted]
(Email)

[redacted]
(Address) SB, CA

SB CA 93109
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

BRETT RUTER

(Print name)

[redacted]

(Email)

[redacted]

(Address)

SB CA 93108

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Kristie Rittle [redacted]

(Print name) (Email)

[redacted] SB, CA 93110

(Address) (City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Patty Handley

(Pri[redacted]

(Address) [redacted] Calif. 93111

[redacted]

(Email)

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

MARCO CERVANTES
(Print name)

[redacted]
(Email)

(Address)

SB, CA 93101
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Phil Kirkpatrick

(Print n[redacted]

(Email)

(Address)

Santa Barbara, CA

(City, State, Zip)

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Please Protect Our Ocean

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I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

TOM MILLER
(Print name)

[redacted]
(Email)

[redacted]
(Address)

GOLETA CA 93111
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

ANDREW GARDNER (Print name)

[redacted] (Email)

[redacted] (Address)

SANTA BARBARA, CA 93108 (City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

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Sincerely,

Glenn Hallam

(P[redacted])

(Email)

[redacted]

(Address)

Oxnard, CA 93035

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

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Sincerely,

Brian Trautwein

(P[redacted]

(Address)

[redacted]

(Email)

Goleta CA 93117

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Sincerely,

_____ _____

(Print name) (Email)

_____ _____

(Address) (City, State, Zip)

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Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Randy Evered [redacted]

(Print[redacted]) (Email)

[redacted] Santa Barbara, CA 93105

(Address) (City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Milo Alves
(Print name)

[redacted]
(Email)

[redacted] Goleta CA, 93111
(Address) (City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Sincerely,

Miranda Aguilar [redacted]

(Print) (Email)

[redacted] Ventura, CA, 93003

(Address) (City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Danielle Muller
(Print name)

[redacted]
(Email)

[redacted]
(Address)

San Diego, CA 92107
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.
Sincerely,

Morgan Houston
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Ventura, CA 93003
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Miranda Magaña
(Print name)

[redacted]
(Address)

(Email)

Oxnard 93030
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

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Sincerely,

Emily Hunt
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Ventura, CA 93003
(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Por favor proteja nuestro océano

Estimados Comisarios de Pesca y Caza:

Les escribo para instarles respetuosamente a que aprueben dos peticiones de Áreas Marinas Protegidas (MPA, por sus siglas en inglés). Peticiones: 1) MPA Mishopshno, que crearía una nueva Área de Conservación Marina Estatal (2023-29MPA) (SMCA, por sus siglas en inglés); y 2) MPA Anacapa, que reclasificaría una SMCA a Reserva Marina Estatal (SMR, por sus siglas en inglés) (2023-27 MPA). La creación de una nueva MPA frente a la costa de Carpintería ayudará a cumplir con las directrices científicas para el espaciamiento entre hábitats protegidos, promoviendo la conectividad en la red de AMP y la representación de tipos de hábitat. También protegerá hábitats atractivos para la vida silvestre, como los tiburones blancos juveniles, y permitirá un mejor acceso a la costa y a los recursos marinos para fines tradicionales, ceremoniales, culturales y de subsistencia para la tribu Banda de los Indios Chumash de Santa Ynez, -reconocida federalmente. La reclasificación de Anacapa SMCA a SMR protegerá mejor el hábitat de pastos marinos, ya que hay evidencia de que la captura y el anclaje estacional de langosta en el SMCA está destruyendo lechos de pastos marinos que de otro modo prosperarán en el Anacapa SMR adyacente.

Autor de la foto: Brett Seymour, NPS

Haga lo correcto para nuestra comunidad y proteja la biodiversidad única de nuestro océano para las futuras generaciones de usuarios del océano.

Atentamente, Denia Díaz

([redacted])

(Correo electrónico)

([redacted])

(Dirección)

(Ciudad, Estado, Código postal)

Al firmar este documento, acepta recibir actualizaciones de Environmental Defense Center.

Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Enoc Gutierrez Gonzalez [redacted]

(Print name) (Email)

[redacted] Camarillo, CA, 93010

(Address) (City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

JILL COFFAN
(Print name)

[redacted]
(Address)

-
(Email)

VTA CA 93003
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Ian _____ _____

(Print name) (Email)

_____ ventura _____

(Address) (City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Tanya _____ [redacted]

(Print name) (Email)

_____ Ventura 93003

(Address) (City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Kathleen Good
(Print name)

[redacted]
(Email)

[redacted] Ventura
(Address)

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Elizabeth Rodero [redacted]

(Print name) (Email)

Ojai 93023

(Address) (City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Hector Mejia

[redacted] Camarillo, CA 93010

(Address)

[redacted]

(Email)

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Laura Thomas
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Oxnard CA 93035
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Sean McArthur
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Santa Barbara
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Lyndsey McNeill
(Print name)

[redacted] Goleta, CA 93117
(Address)

[redacted]
(Email)

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Maria Santiago

(Print name)

[redacted] Turbo Rd

(Address)

[redacted]

(Email)

Goleta, CA, 93117

(City, State, Zip)

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Por favor proteja nuestro océano

Estimados Comisarios de Pesca y Caza:

Les escribo para instarles respetuosamente a que aprueben dos peticiones de Áreas Marinas Protegidas (MPA, por sus siglas en inglés). Peticiones: 1) MPA Mishopshno, que crearía una nueva Área de Conservación Marina Estatal (2023-29MPA) (SMCA, por sus siglas en inglés); y 2) MPA Anacapa, que reclasificaría una SMCA a Reserva Marina Estatal (SMR, por sus siglas en inglés) (2023-27 MPA). La creación de una nueva MPA frente a la costa de Carpintería ayudará a cumplir con las directrices científicas para el espaciamiento entre hábitats protegidos, promoviendo la conectividad en la red de AMP y la representación de tipos de hábitat. También protegerá hábitats atractivos para la vida silvestre, como los tiburones blancos juveniles, y permitirá un mejor acceso a la costa y a los recursos marinos para fines tradicionales, ceremoniales, culturales y de subsistencia para la tribu Banda de los Indios Chumash de Santa Ynez, -reconocida federalmente. La reclasificación de Anacapa SMCA a SMR protegerá mejor el hábitat de pastos marinos, ya que hay evidencia de que la captura y el anclaje estacional de langosta en el SMCA está destruyendo lechos de pastos marinos que de otro modo prosperarán en el Anacapa SMR adyacente.

Autor de la foto: Brett Seymour, NPS

Haga lo correcto para nuestra comunidad y proteja la biodiversidad única de nuestro océano para las futuras generaciones de usuarios del océano.

Atentamente,

Cami Child

(Nombre en letra imprenta)

[redacted]

(Dirección)

[redacted]

(Correo electrónico)

Goleta 93117

(Ciudad, Estado, Código postal)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Chloe Hu
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta, 93117
(City, State, Zip)

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Please Protect Our Ocean

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Photo Credit: Brett Seymour, NPS

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Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Sidney Loftman
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta, CA 93117
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Rebecca Williams
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta CA 93117
(City, State, Zip)

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Please Protect Our Ocean

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I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Kaitlin Crane
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Goleta, CA 93117
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Kinga Bihari
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Isla Vista, CA, 93117
(City, State, Zip)

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Please Protect Our Ocean

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Photo Credit: Brett Seymour, NPS

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Sincerely,

Bellett Stubbs-Friedmann

(Print name) [redacted]

(Address)

[redacted]

(Email)

Goleta, CA 93117

(City, State, Zip)

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Please Protect Our Ocean

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I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

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Sincerely,

Jessie Boswell
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta, CA 93117
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Sincerely,

Tara Robinson
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta, CA 93117
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Michelle [redacted]

(Print name) (Email)

[redacted] Goleta

(Address) (City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Jennifer Gould
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta, CA 93117
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

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Sincerely,

Sorel Benitez

(Print[redacted])

[redacted]

(Email)

(Address)

Goleta, CA, 93117

(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Breanna Elman [redacted]

[redacted] Goleta CA 93117

Nylon Guss [redacted]

[redacted] Goleta CA 93117

Charlotte Breier [redacted]

Hadley Mahoney [redacted]

Bruno Bartalos

Ryan Chavez

Heather Albiol

Nora Ismael

Açúcar Pinto

Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Alexandra Wang [redacted]

(Address) (Email)

Mililani, HI 96789

(City, State, Zip)

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Por favor proteja nuestro océano

Estimados Comisarios de Pesca y Caza:

Les escribo para instarles respetuosamente a que aprueben dos peticiones de Áreas Marinas Protegidas (MPA, por sus siglas en inglés). Peticiones: 1) MPA Mishopshno, que crearía una nueva Área de Conservación Marina Estatal (2023-29MPA) (SMCA, por sus siglas en inglés); y 2) MPA Anacapa, que reclasificaría una SMCA a Reserva Marina Estatal (SMR, por sus siglas en inglés) (2023-27 MPA). La creación de una nueva MPA frente a la costa de Carpintería ayudará a cumplir con las directrices científicas para el espaciamiento entre hábitats protegidos, promoviendo la conectividad en la red de AMP y la representación de tipos de hábitat. También protegerá hábitats atractivos para la vida silvestre, como los tiburones blancos juveniles, y permitirá un mejor acceso a la costa y a los recursos marinos para fines tradicionales, ceremoniales, culturales y de subsistencia para la tribu Banda de los Indios Chumash de Santa Ynez, -reconocida federalmente. La reclasificación de Anacapa SMCA a SMR protegerá mejor el hábitat de pastos marinos, ya que hay evidencia de que la captura y el anclaje estacional de langosta en el SMCA está destruyendo lechos de pastos marinos que de otro modo prosperarán en el Anacapa SMR adyacente.

Autor de la foto: Brett Seymour, NPS

Haga lo correcto para nuestra comunidad y proteja la biodiversidad única de nuestro océano para las futuras generaciones de usuarios del océano.

Atentamente,

ANASTASIA WANG

(Nombre en letra imprenta)

[redacted]

(Dirección)

[redacted]

(Correo electrónico)

MILILANI, HI 96789

(Ciudad, Estado, Código postal)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Helen Samba
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Santa Barbara, CA, 93106
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Anna Lisenberg
(Print name)

[redacted]
(Email)

[redacted]
(Address)

[redacted], Goleta, CA 93117
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Mohamed Zaid Fayyaz
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta, CA 93117
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Isabel Hart [redacted]

(Pri[redacted])

[redacted]

(Email)

[redacted] Shaker Heights, OH 44120

(Address)

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Chloe Mercado
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta, CA 93117
(City, State, Zip)

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Please Protect Our Ocean

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I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Anna Ambriz
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Newbury Springs Ca 9136S
(City, State, Zip)

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Please Protect Our Ocean

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Photo Credit: Brett Seymour, NPS

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Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Shivank Thanji
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta, 93117, CA.
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Sincerely,

Thomas Farrill
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta CA 93117
(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Por favor proteja nuestro océano

Estimados Comisarios de Pesca y Caza:

Les escribo para instarles respetuosamente a que aprueben dos peticiones de Áreas Marinas Protegidas (MPA, por sus siglas en inglés). Peticiones: 1) MPA Mishopshno, que crearía una nueva Área de Conservación Marina Estatal (2023-29MPA) (SMCA, por sus siglas en inglés); y 2) MPA Anacapa, que reclasificaría una SMCA a Reserva Marina Estatal (SMR, por sus siglas en inglés) (2023-27 MPA). La creación de una nueva MPA frente a la costa de Carpintería ayudará a cumplir con las directrices científicas para el espaciamiento entre hábitats protegidos, promoviendo la conectividad en la red de AMP y la representación de tipos de hábitat. También protegerá hábitats atractivos para la vida silvestre, como los tiburones blancos juveniles, y permitirá un mejor acceso a la costa y a los recursos marinos para fines tradicionales, ceremoniales, culturales y de subsistencia para la tribu Banda de los Indios Chumash de Santa Ynez, -reconocida federalmente. La reclasificación de Anacapa SMCA a SMR protegerá mejor el hábitat de pastos marinos, ya que hay evidencia de que la captura y el anclaje estacional de langosta en el SMCA está destruyendo lechos de pastos marinos que de otro modo prosperarán en el Anacapa SMR adyacente.

Autor de la foto: Brett Seymour, NPS

Haga lo correcto para nuestra comunidad y proteja la biodiversidad única de nuestro océano para las futuras generaciones de usuarios del océano.

Atentamente,

Paige Grinnell
(Nombre)

[redacted]
(Dirección)

[redacted]
(Correo electrónico)

CA 93117
(Ciudad, Estado, Código postal)

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Please Protect Our Ocean

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Photo Credit: Brett Seymour, NPS

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Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

ANH NGUYEN [redacted]

(Print name) (Email)

[redacted] CA 95111

(Address) (City, State, Zip)

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Por favor proteja nuestro océano

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Autor de la foto: Brett Seymour, NPS

Haga lo correcto para nuestra comunidad y proteja la biodiversidad única de nuestro océano para las futuras generaciones de usuarios del océano.

Atentamente, Alyssa Fernandez

(Nombre en letra imprenta)

[redacted]

(Dirección)

[redacted]

(Correo electrónico)

Goleta, CA, 93117

(Ciudad, Estado, Código postal)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Sasha Schotthoefer
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta, CA, 93117
(City, State, Zip)

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Por favor proteja nuestro océano

Estimados Comisarios de Pesca y Caza:

Les escribo para instarles respetuosamente a que aprueben dos peticiones de Áreas Marinas Protegidas (MPA, por sus siglas en inglés). Peticiones: 1) MPA Mishopshno, que crearía una nueva Área de Conservación Marina Estatal (2023-29MPA) (SMCA, por sus siglas en inglés); y 2) MPA Anacapa, que reclasificaría una SMCA a Reserva Marina Estatal (SMR, por sus siglas en inglés) (2023-27 MPA). La creación de una nueva MPA frente a la costa de Carpintería ayudará a cumplir con las directrices científicas para el espaciamiento entre hábitats protegidos, promoviendo la conectividad en la red de AMP y la representación de tipos de hábitat. También protegerá hábitats atractivos para la vida silvestre, como los tiburones blancos juveniles, y permitirá un mejor acceso a la costa y a los recursos marinos para fines tradicionales, ceremoniales, culturales y de subsistencia para la tribu Banda de los Indios Chumash de Santa Ynez, -reconocida federalmente. La reclasificación de Anacapa SMCA a SMR protegerá mejor el hábitat de pastos marinos, ya que hay evidencia de que la captura y el anclaje estacional de langosta en el SMCA está destruyendo lechos de pastos marinos que de otro modo prosperarán en el Anacapa SMR adyacente.

Autor de la foto: Brett Seymour, NPS

Haga lo correcto para nuestra comunidad y proteja la biodiversidad única de nuestro océano para las futuras generaciones de usuarios del océano.

Atentamente,

Carla Brechter
(Nombre en letra imprenta)

[redacted]
(Dirección)

[redacted]
(Correo electrónico)

Goleta CA 93117
(Ciudad, Estado, Código postal)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Hannah Jones
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Laguna Niguel, CA, 92677
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

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Sincerely,

Catherine Pizzinat

(Print name)

[redacted]

(Address)

[redacted]

(Email)

Goleta, CA 93110

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Maria Malafei

(Print name)

[redacted]

(Email)

[redacted]

(Address)

Goleta, CA 93117

(City, State, Zip)

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Please Protect Our Ocean

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Photo Credit: Brett Seymour, NPS

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Sincerely,

Jacob Carver
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Santa Barbara, CA 93117
(City, State, Zip)

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Por favor proteja nuestro océano

Estimados Comisarios de Pesca y Caza:

Les escribo para instarles respetuosamente a que aprueben dos peticiones de Áreas Marinas Protegidas (MPA, por sus siglas en inglés). Peticiones: 1) MPA Mishopshno, que crearía una nueva Área de Conservación Marina Estatal (2023-29MPA) (SMCA, por sus siglas en inglés); y 2) MPA Anacapa, que reclasificaría una SMCA a Reserva Marina Estatal (SMR, por sus siglas en inglés) (2023-27 MPA). La creación de una nueva MPA frente a la costa de Carpintería ayudará a cumplir con las directrices científicas para el espaciamiento entre hábitats protegidos, promoviendo la conectividad en la red de AMP y la representación de tipos de hábitat. También protegerá hábitats atractivos para la vida silvestre, como los tiburones blancos juveniles, y permitirá un mejor acceso a la costa y a los recursos marinos para fines tradicionales, ceremoniales, culturales y de subsistencia para la tribu Banda de los Indios Chumash de Santa Ynez, -reconocida federalmente. La reclasificación de Anacapa SMCA a SMR protegerá mejor el hábitat de pastos marinos, ya que hay evidencia de que la captura y el anclaje estacional de langosta en el SMCA está destruyendo lechos de pastos marinos que de otro modo prosperarán en el Anacapa SMR adyacente.

Autor de la foto: Brett Seymour, NPS

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Atentamente,

KATY DENEZZO

[redacted]

(Dirección)

[redacted]

(Correo electrónico)

GOLETA CA 93117

(Ciudad, Estado, Código postal)

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Photo Credit: Brett Seymour, NPS

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Sincerely,

Norm Ladzekpo

(Print name)

[redacted]

(Address)

[redacted]

(Email)

Goleta, CA. 93117

(City, State, Zip)

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Autor de la foto: Brett Seymour, NPS

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Atentamente,

Archie McNeil

(Nombre en letra imprenta)

[redacted]

(Dirección)

[redacted]

(Correo electrónico)

Goleta, CA 93117

(Ciudad, Estado, Código postal)

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Autor de la foto: Brett Seymour, NPS

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Atentamente,

Anna Tackabery

([redacted])

([redacted])

(Dirección)

(Correo electrónico)

Goleta, CA 93117

(Ciudad, Estado, Código postal)

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Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Sincerely,

Zach Zavodnik
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta, CA 93117
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Sincerely,

Katrina Rugeda
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta, CA 93117
(City, State, Zip)

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Autor de la foto: Brett Seymour, NPS

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Atentamente, Clio Salles Spar

(N[redacted]

(Dirección)

[redacted]

(Correo electrónico)

~~[redacted]~~ Dobbs Ferry, NY, 10533

(Ciudad, Estado, Código postal)

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Photo Credit: Brett Seymour, NPS

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Sincerely,

Isabel Saavedra [redacted]

(Print name) (Email)

[redacted] Goleta, CA 93117

(Address) (City, State, Zip)

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Photo Credit: Brett Seymour, NPS

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Sincerely,

Sam Maybaum
(Print name)

[redacted]
(Email)

[redacted]
(Address) 93117

Goleta, CA, 93117
(City, State, Zip)

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Autor de la foto: Brett Seymour, NPS

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Atentamente,

Arushi Lakhanpal
(Nombre en letra imprenta)

[redacted]
(Correo electrónico)

[redacted]
(Dirección)

SB 93101
(Ciudad, Estado, Código postal)

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Autor de la foto: Brett Seymour, NPS

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Atentamente,

Elijah Anderson

(Nombre en letra imprenta)

[redacted]

(Dirección)

[redacted]

(Correo electrónico)

93117, Santa Barbara, CA

(Ciudad, Estado, Código postal)

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Autor de la foto: Brett Seymour, NPS

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Atentamente, Claire Art

(Nombre en letra imprenta)

[redacted]

(Dirección)

[redacted]

(Correo electrónico)

Goleta, CA

(Ciudad, Estado, Código postal)

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Autor de la foto: Brett Seymour, NPS

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Atentamente,

Daniela Lopez Maria

(Nombre en letra imprenta)

[redacted]

(Dirección)

[redacted]

(Correo electrónico)

Isla Vista, CA

(Ciudad, Estado, Código postal)

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Autor de la foto: Brett Seymour, NPS

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Atentamente,

Meg Chang
(Nombre en letra imprenta)

[redacted]
(Correo electrónico)

(Dirección)

San Jose CA 95129
(Ciudad, Estado, Código postal)

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Autor de la foto: Brett Seymour, NPS

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Atentamente,

[redacted]

(Nombre en letra imprenta)

[redacted]

(Correo electrónico)

(Dirección)

[redacted]

(Ciudad, Estado, Código postal)

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Autor de la foto: Brett Seymour, NPS

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Atentamente,

Isabella Torres

(Nombre en letra imprenta)

[redacted]

(Dirección)

[redacted]

(Correo electrónico)

Goleta

(Ciudad, Estado, Código postal)

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Autor de la foto: Brett Seymour, NPS

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Atentamente,

Jenny Skrumbis

(Nombre en letra imprenta)

[redacted]

(Dirección)

[redacted]

(Correo electrónico)

CA 93117

(Ciudad, Estado, Código postal)

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Autor de la foto: Brett Seymour, NPS

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Atentamente, Samantha Garcia

(Nombre en letra imprenta) [redacted]

(Dirección)

(Correo electrónico) [redacted]

Goleta, CA, 93117

(Ciudad, Estado, Código postal)

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Autor de la foto: Brett Seymour, NPS

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Atentamente, Richard Palafox

(Nombre en letra imprenta)

[redacted]

(Dirección)

[redacted]

(Correo electrónico)

Goleta, CA, 93117

(Ciudad, Estado, Código postal)

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Autor de la foto: Brett Seymour, NPS

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Atentamente,

Mila Matich

(Nombre en letra imprenta)

[redacted]

(Dirección)

[redacted]

(Correo electrónico)

Manhattan Beach, CA, 90266

(Ciudad, Estado, Código postal)

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Autor de la foto: Brett Seymour, NPS

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Atentamente, Colleen Gaffney

(Nombre en letra imprenta) [redacted]

(Dirección)

[redacted]

(Correo electrónico)

Goleta, CA 93117

(Ciudad, Estado, Código postal)

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Autor de la foto: Brett Seymour, NPS

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Atentamente, KARA NGUYEN

(Nombre en letra imprenta)

[redacted]

(Dirección)

[redacted]

(Correo electrónico)

GOLETA, CA 93117

(Ciudad, Estado, Código postal)

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Autor de la foto: Brett Seymour, NPS

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Atentamente,

Noemi Bethel
(Nombre en letra imprenta)

[redacted]
(Dirección)

[redacted]
(Correo electrónico)

Goleta, CA 93117
(Ciudad, Estado, Código postal)

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Autor de la foto: Brett Seymour, NPS

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Atentamente, Lucero Torres

(Nombre en letra imprenta) [redacted]

(Dirección)

[redacted]

(Correo electrónico)

Santa Barbara, CA 93107

(Ciudad, Estado, Código postal)

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Autor de la foto: Brett Seymour, NPS

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Atentamente,

Morgan Downes

(Nombre en letra imprenta)

[redacted]

(Correo electrónico)

[redacted]

(Dirección)

SB, CA 93106

(Ciudad, Estado, Código postal)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Celeste Mota Campos
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta CA 93117
(City, State, Zip)

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Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Claire Cady
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Santa Barbara CA 93117
(City, State, Zip)

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Sincerely,

Julia Dahl
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Isla Vista, CA, 93117
(City, State, Zip)

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Sincerely,

Pallas Lemarchand [redacted]

(Address)

[redacted]

(Email)

Campbell, CA, 95008

(City, State, Zip)

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Photo Credit: Brett Seymour, NPS

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Sincerely,

Annie Gleason
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Centennial, CO, 80122
(City, State, Zip)

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Autor de la foto: Brett Seymour, NPS

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Atentamente,

Betzaida Chavez

(Nombre en letra imprenta)

[redacted]

(Dirección)

[redacted]

(Correo electrónico)

Goleta

(Ciudad, Estado, Código postal)

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Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Irene Caballero

(P[redacted])

[redacted]

(Email)

(Address)

W. CA 93117

(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Esther Flores
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta, CA 93117
(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Por favor proteja nuestro océano

Estimados Comisarios de Pesca y Caza:

Les escribo para instarles respetuosamente a que aprueben dos peticiones de Áreas Marinas Protegidas (MPA, por sus siglas en inglés). Peticiones: 1) MPA Mishopshno, que crearía una nueva Área de Conservación Marina Estatal (2023-29MPA) (SMCA, por sus siglas en inglés); y 2) MPA Anacapa, que reclasificaría una SMCA a Reserva Marina Estatal (SMR, por sus siglas en inglés) (2023-27 MPA). La creación de una nueva MPA frente a la costa de Carpintería ayudará a cumplir con las directrices científicas para el espaciamiento entre hábitats protegidos, promoviendo la conectividad en la red de AMP y la representación de tipos de hábitat. También protegerá hábitats atractivos para la vida silvestre, como los tiburones blancos juveniles, y permitirá un mejor acceso a la costa y a los recursos marinos para fines tradicionales, ceremoniales, culturales y de subsistencia para la tribu Banda de los Indios Chumash de Santa Ynez, -reconocida federalmente. La reclasificación de Anacapa SMCA a SMR protegerá mejor el hábitat de pastos marinos, ya que hay evidencia de que la captura y el anclaje estacional de langosta en el SMCA está destruyendo lechos de pastos marinos que de otro modo prosperarán en el Anacapa SMR adyacente.

Autor de la foto: Brett Seymour, NPS

Haga lo correcto para nuestra comunidad y proteja la biodiversidad única de nuestro océano para las futuras generaciones de usuarios del océano.

Atentamente, Ciara Garcia

(Nombre en letra imprenta)

[redacted]

(Correo electrónico)

[redacted]

(Dirección)

Goleta

(Ciudad, Estado, Código postal)

Al firmar este documento, acepta recibir actualizaciones de Environmental Defense Center.

Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

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Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Dalila Alarcon Whitehead [redacted]

(Print name) (Email)

[redacted] Santa Barbara CA

(Address) (City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Cayer Segall
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta, CA 93117
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Alex — (Print name)

[redacted] — (Email)

[redacted] — (Address)

Goleta, CA 93117 — (City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Dana Hand
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Islavista, CA 93117
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Elise Jault
(Print name)

[redacted]
(Email)

[redacted]
(Address)

93117, Goleta, CA
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Victoria Huizar
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Goleta, CA, 93117
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Lucy Dixon
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Goleta, CA 93107
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

Photo Credit: Brett Seymour, NPS

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Ela Schulz
(Print name)

[redacted]
(Address)

[redacted]
(Email)

a3117
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Micah Littlepage
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Goleta, CA 93117
(City, State, Zip)

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Please Protect Our Ocean

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Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Delanie Valencia
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Lompoc, CA 93436
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

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Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

VIVIANA MARSANO
(Print name)

[redacted]
(Email)

(Address)

(City, State, Zip)

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Please Protect Our Ocean

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Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Lauren Janson
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Lompoc, CA, 93436
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

EVA GUILE
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Studio City, CA, 91604
(City, State, Zip)

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Please Protect Our Ocean

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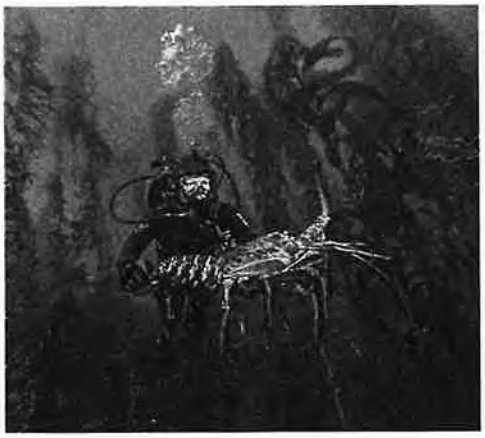

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Abigail Raftery
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Santa Barbara, CA 93106
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Gratia Hill
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Santa Barbara, CA, 93101
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Wyatt Sanchez
(Print name)

[redacted]
(Address) Hills, CA, 91354

[redacted]
(Email)

(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Quentin Burns
(Print name)

Jalama House Room 2216
(Address)

quentinburns81@gmail.com
(Email)

SANTA BARBARA, CA, 93106
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

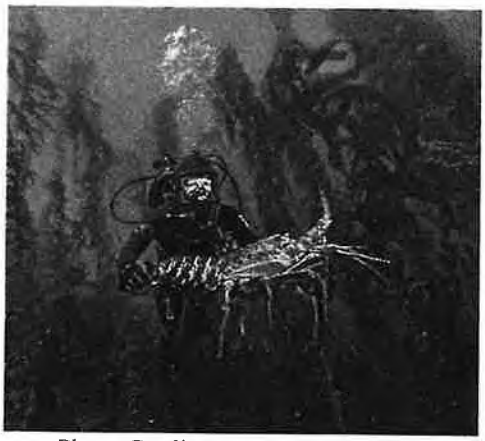

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Johnny McConville
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Santa Barbara, CA
(City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely, Angel Fajardo
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Camarillo, Ca, 93010
(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Please Protect Our Ocean

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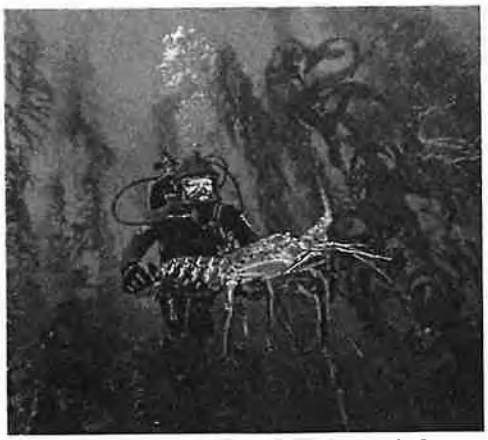

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely, EUGILE PERUNAS
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Ventura, CA 93004
(City, State, Zip)

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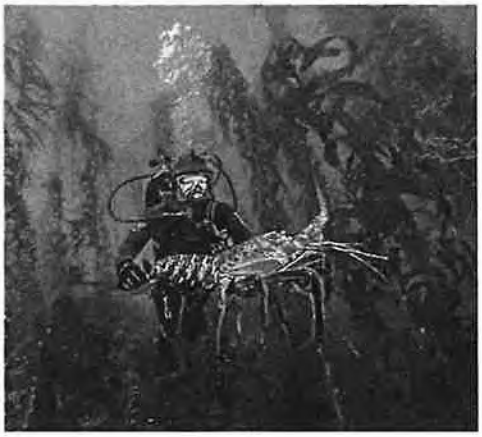

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Alecia Locke
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Ventura CA 93003
(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

Please Protect Our Ocean

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I am writing to respectfully urge that you approve two Marine Protected Areas (MPA) Petitions: 1) Mishopshno MPA, which would create a new State Marine Conservation Area (2023-29MPA) (SMCA); and 2) Anacapa MPA, which would reclassify a SMCA to a State Marine Reserve (SMR) (2023-27MPA). Creating a new MPA off the coast of Carpinteria will help meet the science guidelines for spacing between protected habitats, promoting connectivity in the MPA network and representation of habitat types. It will also protect habitat attractive to marine wildlife, such as juvenile white sharks, and will allow enhanced access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for the federally recognized tribe of the Santa Ynez Band of Chumash Indians. Reclassifying Anacapa SMCA to an SMR will better protect eelgrass habitat as there is evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

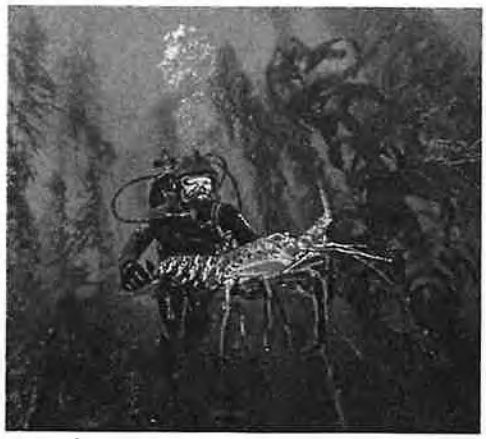

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

SOPHIA MILLER
(Print name)

[redacted]
(Address)

OAK VIEW, CA 93022

[redacted]
(Email)

(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

CALIFORNIA FISH AND GAME COMMISSION
RECEIVED 10/24/2025

Planning and Development
Lisa Plowman, Director
Jeff Wilson, Assistant Director
Elise Dale, Assistant Director

Dear Ms. Miller-Henson,

As Secretary of the Santa Barbara County Fish and Wildlife Commission, I am submitting the attached letter containing formal comments regarding the current Marine Protected Area (MPA) petitions under consideration. This letter reflects the collective position of the full Commission, which includes signatures from all nine appointed members, representing diverse stakeholder groups within Santa Barbara County.

Our Commission has thoroughly reviewed the details of Petitions 2023-14MPA, 2023-15MPA-AM, 2023-18MPA, 2023-28MPA-AM, 2023-29MPA-AM, and 2023-33MPA-AM. As outlined in the attached document, our positions and recommendations were developed through numerous public meetings and extensive local input, based on decades of combined experience in fish and wildlife matters across the county.

We appreciate the opportunity to contribute to the discussion surrounding MPA management and thank the California Fish and Game Commission for its continued commitment to public engagement and science-informed decision-making. Should you or your staff require any further clarification or supporting materials, please do not hesitate to contact me directly.

Sincerely,

Secretary, Santa Barbara County Fish and Wildlife Commission
Phone: 805-934-6297
Email: castrot@countyofsb.org

one COUNTY one FUTURE

Planning and Development
Lisa Plowman, Director
Jeff Wilson, Assistant Director
Elise Dale, Assistant Director

October 20, 2025

To: Ms. Melissa Miller-Henson

Executive Director

California Fish and Game Commission

715 "P" St. 16th Floor Sacramento, CA 95814

From: Santa Barbara County Fish and Wildlife Commission

c/o Santa Barbara County Planning and Development

624 W. Foster Road. Santa Maria, CA 93455

Dear Ms. Miller-Henson,

The Santa Barbara Fish and Wildlife Commission is a county commission consisting of nine members appointed by the Santa Barbara County Board of Supervisors. The commission, among other things, aids the county board on active fish and wildlife related matters with our combined hundreds of years of local fish and wildlife experience between our fellow commissioners.

This comment letter serves to provide our input regarding the current MPA petitions requesting changes be made to the MPA network specifically around the Santa Barbara Channel and Channel Islands. We feel our county fish and wildlife commission's input on the MPA petition process may prove especially valuable due to our local experiences and local understanding of the ecosystem, as well as our variety of backgrounds, consisting of non-consumptive users, fishermen, and biological scientists. This letter serves as a culmination of many public meetings learning about the MPA petitions that have been proposed as well as fellow commissioners observations being involved in local discussions about the petitions outside of official meetings to gauge public input and sentiment. This county commission appreciates the opportunity to provide the following feedback on these local MPA petitions.

Petition2023-14MPA

Petition2023-14MPA requests changes to several State Marine Conservation Areas (SMCAs), one of which, the Naples SMCA, is within the County. Generally, SMCAs already allow for some form of limited take, this petition requests adding commercial take of sea urchins to the allowable methods list inside of the SMCAs in the petition.

Sea urchins are primarily taken commercially and are a core part of the County's commercial fishing sector. Urchins, and their tendency to graze on the root systems of local kelp forests, have recently posed problems with kelp rebuilding efforts after El Ninos in the 2010's reduced kelp forest size noticeably. Local fishermen cite urchin barrens inside of MPAs that cannot be touched and continue to spread to the surrounding area with no possible measures existing to remove the main mass from the MPA.

Recommendation: While cases may vary across different MPAs and counties, for the above reasons, this commission finds it reasonable to allow the proposed change and supports the petition for allowed sea urchin take at the Naples SMCA to help facilitate kelp forest regrowth. We kindly recommend this change be allowed at Naples.

Petition2023-15MPA-AM

Petition2023-15MPA requests changes to three joint State and Federal Marine Reserves (SMRs/FMRs), all of which, the Footprint SMR/FMR, Gull Island SMR/FMR, and Santa Barbara Island SMR/FMR, border the county. These MPAs, and others around the Channel Islands, are unique to the State network in that they were established through a joint process between State and Federal agencies before the coastal MLPA under the CINMS. The resulting network was a series of state and federal MPAs at the Channel Islands that covers federal water up to 6 nautical miles from the islands. All SMRs and FMRs the petition addresses are currently no-take areas.

The petition requests changing these areas to joint State and Federal Marine Conservation Areas, SMCAs and FMCAs, and proposes several options that allow for various forms of the limited take of pelagic finfish or highly migratory species recreationally and commercially. In addition, the petition provides possible sub-divisions of the Gull Island and Santa Barbara Island State MPAs into nearshore and offshore areas, similar to other State MPAs elsewhere. The primary arguments of the petition are the minimal impact pelagic fishing effort has on the local MPA ecosystem and goals, and the support of pelagic areas in the State's MPA Master Plans and other documents seen in the broader coastal network but apparent lack thereof in the pre-Master Plan Channel Islands network.

Several members of this commission were part of the original process at the Channel Islands over 20 years ago and the southern MLPA in 2012. We all understand that the primary factor for the MPA implementation at these island sites offshore was to originally protect species like groundfish and structure groundfish live on to rebuild overfished populations at the time. While MPA goals have changed since the 2000s, this fact is still key to understanding why these areas are the way they are today.

Pelagic fish, and the methods used to target them, are predominantly fished near the surface of the water column, offshore, and off the bottom. This type of effort avoids the nearshore or offshore rocky-bottom ecosystems local nearshore species or groundfish are predominantly found in. In addition, the pelagic species that would be taken in these areas are significantly less affected by these MPAs and the broader network due to them being very mobile, their relative abundance is not concentrated in an MPA compared to out of one. The MPA Master Plans from 2008 and 2016 discuss this, citing the lower effects that MPAs have on pelagic species and the need to have areas that allow for some form of limited pelagic take, aligning the petitioner's arguments with the Master Plans. In addition, the petition does point out an imbalance in pelagic allowed areas between the MLPA's coastal implementation phases that came after the first MPA Master Plan in 2008 and the Channel Islands Network implementation that came well before the first MPA Master Plan in the early 2000's.

Outside the Channel Islands, in the coastal network that came afterwards, most MPAs that overlap deeper waters pelagic species pass through allow for some form of take of pelagic finfish. Observing the Channel Islands, we can see a significantly higher overlap with offshore waters, namely due to the federal sections

of these MPAs. However, even with this significantly larger offshore encroachment, almost no pelagic allowed areas exist. Whether this difference was due to the Channel Islands process pre-dating the coastal process and the 2008 MPA Master Plan's outlook on pelagic species is up to debate, but the fact of the matter is the difference is noticeably present, and for no abundantly clear reason.

Recommendation: The subject of island MPAs allowing pelagic take, specifically these three, has been raised by the public several times prior at our meetings, and local MPA collaboratives our commissioners have attended. For these reasons, and those above, this commission supports this petition, and believes it should be accepted by the State Commission through one of the proposed "options" the petition lists that best fits the existing network.

Petition2023-18MPA

Petition2023-18MPA requests multiple changes to a variety of coastal and island MPAs within the county. Some of the changes are listed as "non-regulatory requests" by the Department while others make modifications to, or remove existing MPAs. All but one of the MPAs in the petition are within the County, they are the: Vandenberg SMR, Point Conception SMR, Kashtayit SMCA, Campus Point SMCA, and San Miguel Island Special Closure.

Of the changes, the proposal at Vandenberg SMR and San Miguel Island Special Closure are the two MPAs that would have the largest regulatory changes. At Vandenberg the petition requests a coastal SMCA be made that allows for only shore-based fishing by hook-and-line, citing an equity and enforcement concern between military base personnel and members of the public. Because military personnel are allowed to fish the shore of the SMR while members of the public outside the base cannot due to the SMR, both the equity and enforcement concerns are certainly present and should be addressed. The proposed solution of a shore based SMCA does seem to be a reasonable way to correct this problem.

At San Miguel and Anacapa (outside of the county) the petition requests the Special Closure(s) be removed in its entirety citing its original goal being to reduce disturbance to pinniped rookeries and seabird populations has been far exceeded and better methods have been developed on-site.

The remaining MPA requests are non-regulatory and include supported use for M2 radar monitoring at Point Conception SMR for better enforcement, a refined regulatory language for allowances at the Kashtayit SMCA, and using the color red instead of purple for distinguishing the Campus Point No-Take SMCA.

Recommendation: This commission finds all of the above modifications and requests more than reasonable, gives its support for them all. We recommend the FGC accept the petition in full.

Petition2023-28MPA-AM

Petition2023-28MPA requests to create a new MPA around Point Sal, designating it the Point Sal SMCA or a Tribally named SMCA, and listing it as a limited-take area with only an exception of a shore based finfish take allowance and tribal take allowance. The petitions driving reasons for the new MPA are that the area is ecologically significant in terms of local upwelling and relative to the landings that occur there the area is a small fraction of the State's commercial output, under 1%. The petition also cites tribal inclusivity and significance in the area as justification for its closure.

While the petition is accurate in the broader economic analysis, locally Point Sal is a very important area for both recreational and commercial operations out of Port San Luis (Avila), the local port to Point Sal.

Point Sal, and its surrounding waters, are essential for year-round and seasonal fisheries such as salmon, dungeness crab, groundfish, and halibut. This new MPA in addition to the existing network will significantly affect the local port's economic health due to Point Sal's being a significant fishing area for local commercial and recreational anglers. Namely, crab and groundfish boats out of Avila would be significantly affected by this change as per their testimony, over half their time is spent in the proposed area.

Recommendation: While the shore-based allowance is a welcome allowance, we believe this is still too costly on the local economy of Avila and its recreational and commercial fisheries to warrant its allowance. For this reason this commission has decided to be against this petition, and recommends the FGC deny it.

Petition2023-29MPA-AM

Petition2023-29MPA requests to create a new MPA around Carpinteria, designating it the Mishopshno SMCA. The petition asks to make take regulations for the area the same as the Point Sal petition, with an allowance of shore fishing of finfish and a tribal exception for those in the federally recognized Santa Ynez Band of Chumash Indians which would be able to still use tribal take methods inside of the SMCA. The proposed area's size was reduced when the petition was amended to include the shore allowance.

The petition's primary reasons for this MPA include this tribal allowance and co-management model along with the added reasons of MPA connectivity, spacing, and protecting juvenile great white shark nursery grounds. While this commission does agree that Tribal inclusion is a warranted piece of MPA and coastal management, we do not believe that a new MPA altogether is needed to accomplish this. MPAs across the coast can be modified themselves to allow for such co-management but the existing area offshore Carpinteria is currently open to the entire public, Tribes included.

Carpinteria's coast has been the subject of several MPA proposals over the years. During the MLPA the same area was looked into but was ultimately not selected, trading off two other SMCAs instead of establishing one at Carpinteria in a separate MLPA planning alternative. In 2020 this commission also followed a similar MPA petition in a smaller area to the current proposal that similarly advocated to protect juvenile great white sharks. That petition was ultimately rejected by CDFW due to the larger footprint white sharks, a pelagic species, covered relative to the coast of Carpinteria/California in general, and we believe the same reasons from 2020 are still relevant in 2024 against the petitioner's arguments.

Additionally, it should be said that Carpinteria Reef, the reef that would be almost entirely inside the MPA, is one of the last open reef areas to the fishing community. Removing this reef will see the end of local fishing access to coastal reefs, forcing anglers to travel further, coastally or to the islands, and burning more fuel to have similar opportunities. Commercial members of this commission are concerned for the areas of the proposed MPA that overlap the state halibut trawl grounds. These grounds are minimal already and have been reduced continuously over the years. This proposed MPA would cut a significant portion of the current open trawl area harming this unique fishery that the commission has repeatedly stated is well managed. Lastly, there is an overwhelming amount of public outcry on this petition specifically citing lost access to one of the last open reefs on the coast by boat and especially kayak.

Recommendation: For all of these reasons this commission has decided to be against this petition, and requests the FGC deny it.

Petition2023-33MPA-AM

Petition2023-33MPA requests for multiple MPA expansions and one MPA creation throughout the California coast, of which, three MPA expansions are within Santa Barbara at the Point Conception SMR, the Gull Island SMR, and the South Point SMR. Of the three expansions the South Point SMR expansion would be the largest, including all of the southwest side of Santa Rosa Island in the MPA and adding over 27.5 square miles to the SMR. This is followed by Point Conception SMR's expansion eastward adding over 14 more square miles to the SMR, and lastly by Gull Island SMR's smaller northward expansion adding over 1.5 square miles to the closure.

The driving force behind Petition2023-33MPA is kelp restoration. The petition claims growing these MPAs would allow for the now protected areas to rebuild their kelp forests under no fishing pressure which would also mean less traffic in general. Kelp restoration is a very important subject in Santa Barbara County as several sectors, consumptive and non-consumptive, depend on healthy levels of kelp for commercial and recreational use. That being said, this commission believes removing fishing access in these areas will do little to nothing to promote kelp regrowth and more-likely prevent kelp rebuilding projects (seeding, artificial reefs, and sea urchin removal programs) from directly assisting in the rebuilding of our kelp forests. Besides fishing, factors such as water quality, water temperature, storms, and swell need to be considered as larger drivers of kelp loss, not larger closed areas. There are several active projects locally and statewide dedicated to kelp rebuilding, none of which remove fishing access from areas in order to rebuild the kelp because there is no reason to. We believe the same applies in the areas this petition looks at. There are no reasons these specific areas need a fishing closure to help kelp forests regrow; therefore, there is no justification for their expansion, especially into waters predominantly too deep for kelp to root and grow. Similar to petition 29, there has been specific public outcry against this petition for all of the above reasons at MPA collaboratives, and public meetings.

Recommendation: For these reasons this commission has decided to be against this petition and recommends the FGC deny it.

Signed, the Santa Barbara County Fish and Wildlife Commission,

Phil Beguhl (Chair) - 2nd District

Scott Cooper (Vice Chair) - 3rd District

Frank Abatemarco - 1st District

Chad Thomas - 4th District

David Morgan - 5th District

Jeff Landers - Santa Maria Sportsman's Association Representative

Whitney Uyeda - Santa Barbara Sport Fishing Representative

Jeff Maassen - Commercial Fisherman Representative

Steve Adam - Santa Ynez Valley Pistol and Bow Club Representative

County of Santa Barbara
PLANNING AND DEVELOPMENT
North County
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Santa Maria, CA 93455-3623

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Ms. Melissa Miller-Henson Executive
Director
California Fish and Game Commission

715 "P" St. 16th Floor
Sacramento, CA 95814

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Assembly
California Legislature

STEVE BENNETT
ASSEMBLYMEMBER, THIRTY-EIGHTH DISTRICT

COMMITTEES
CHAIR: BUDGET SUBCOMMITTEE NO. 4 ON CLIMATE CRISIS, RESOURCES, ENERGY, AND TRANSPORTATION
BUDGET
ELECTIONS
EMERGENCY MANAGEMENT
WATER, PARKS AND WILDLIFE

December 10, 2025

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

Re: Support for Petitions 2023-28MPA and 2023-29MPA

Dear President Zavaleta and Honorable Commissioners:

I am writing in 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 the Central Coast region's ocean-based economy thrives for decades to come. I urge you to approve these proposals.

Both the proposed Point Sal and Mishopshno MPAs 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. 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 hold 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. 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[1]. In 2024,

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

coastal tourism brought just over $1.7 billion in travel-related spending to Ventura County, directly supporting no less than 16,600 jobs[2]. Ventura Harbor is home-base for Island Packers Cruises: the go-to transport company between the mainland and Channel Islands National Park (CINP). CINP officials reported that in 2022, 323,000 tourists visited the National Park, spending almost $22 million in neighboring communities, with a cumulative benefit to the local regional economy of $31.9 million[3].

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 our strong support for these proposals that aim 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,

Steve Bennett

Assemblymember Steve Bennett
38th Assembly District

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

[3] Tourism to Channel Islands National Park Contributes $31.9 million to Local Economy
https://www.nps.gov/chis/learn/news/pr082523.htm

From: Sullivan, Isabella <[redacted]>
Sent: Wednesday, December 17, 2025 10:59 AM
To: Commissioner Anderson <[redacted]>; Jacque Hostler-Carmesin <[redacted]>; [redacted] Eric Sklar <[redacted]>; Erika Zavaleta <[redacted]>; FGC <FGC@fgc.ca.gov>
Cc: [redacted] Azsha Hudson <[redacted]>; Aylesworth, Sandy <[redacted]>; Brown, Margaret <[redacted]>
Subject: Chumash Testimonies Letter

Dear Honorable Commissioners and FGC staff,

I hope this email finds you well and getting ready for the much needed holiday break! We are excited to share a project that has been in the works for a couple months. Working with the Santa Ynez Band of Chumash Indian's Culture department, NRDC conducted interviews with various Chumash community members. to accompany the Mishopshno SMCA Petition 2023-29MPA. The purpose of these interviews was to convey Chumash peoples' sentiments and extensive knowledge of the area proposed to be protected, in a more expansive and informal format than a public meeting allows. These testimonies provide just a glimpse into the breadth of knowledge that Chumash people and cultures hold about their ancestral territories, ocean practices and traditions, and Tribal marine stewardship and management.

We hope you enjoy reading these testimonies, as they are deeply profound as well as informative. As always, thank you all for your work and time throughout the adaptive management process to safeguard our coast. Wishing you all happy winter holidays!

Sincerely,

Bella Sullivan

December 17, 2025

California Department of Fish and Wildlife
715 P Street
Sacramento, CA 95814

Re: Tribal testimonies and support for Petition 2023-29MPA

Dear President Zavaleta and Honorable Commissioners,

We are writing to share the testimonies of Chumash community members and additional history related to the proposed Mishopshno State Marine Conservation Area (SMCA). The Santa Ynez Band of Chumash Indians (SYBCI), the Natural Resources Defense Council (NRDC), and the Environmental Defense Center (EDC) are co-sponsors of Petition 2023-29MPA. The Mishopshno SMCA is named after a prominent Chumash coastal village of the same name that was historically proximate to the marine area under consideration. We share these testimonies to uplift the significance of the area and the SMCA proposal itself for individual Chumash community members, in addition to the SYBCI Tribal government that is co-sponsoring it.

Chumash people have inhabited the areas now known as the Santa Barbara Coast and Channel Islands for over 10,000 years.[1] Through the millennia, Chumash communities stewarded and lived in close connection to their lands and waters.[2] Beginning in earnest in the 18th century, settler colonialism and state-sponsored genocide in California disrupted the millennia-old Chumash relationships to the Central Coast – outlawing Chumash religion, language, and cultural and subsistence practices. In many cases settlers forcibly displaced Chumash people and communities and denied them access to their own territories.[3] Chumash people and communities resisted these efforts for centuries, and continue to fight today for stewardship and sovereignty of their ancestral territories, and the survivance and wellbeing of their respective cultures.

The Mishopshno SMCA seeks to advance Tribal co-stewardship, to honor the cultural and historical heritage of Chumash peoples in the area, and to conserve a unique and ecologically important area on the Southern California Coast. California is currently conducting its first-ever

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[1] McGinnis, Michael. 2022. *Co-Management of California-Chumash Marine Conservation Areas: A White Paper Produced for the Santa Ynez Band of Chumash Indians*, 4.
[2] Ibid., 7.
[3] *Chumash History*. Santa Ynez Band of Chumash Indians. (n.d.). https://chumash.gov/chumash-history.

MPA adaptive management process, and the state has the opportunity now to more thoroughly include the groups that were underrepresented during the initial implementation of the MPA network, including Tribes. This petition is one of the first Tribally proposed state MPAs in California, and its designation would pave the way for strengthening the role and authority of California Tribes in ocean management and marine life protection efforts. With a collaborative co-stewardship approach, the Mishopshno SCMA would also contribute to integrating Tribes in California's marine monitoring and management initiatives. Further, this proposal aligns with the state's goal of supporting Tribally-led conservation.[4,5]

Recognizing the deep connection and expertise Chumash people hold relative to the area of the proposed SMCA, NRDC interviewed community members from the Santa Ynez Band of Chumash Indians and Barbareño Band of Chumash Indians. The purpose of the interviews was to learn more about their connection to the ocean as Chumash people and why they support the designation of the Mishopshno SMCA. The testimonies below offer insight into perspectives around the designation of the Mishopshno SMCA and why increasing opportunities for Tribal marine stewardship is imperative.

The Santa Barbara Channel and Chumash Identity

Mishopshno Village was an important coastal site in the ancestral lands of the diverse Chumash people because of its use for boatbuilding and close proximity to the ocean. Members of the Portolá expedition who encountered the town on August 17, 1769 described it as "...at the very edge of the sea a large village or very regular town here at this point, appearing at a distance as though it were a shipyard, because at the moment they were building a canoe that still had its topmost plank lacking from it (dubbed by soldiers La Carpinteria, the Carpenter Shop)."[6] The canoes described here were tomol, Chumash watercraft built using wood and tar that seeps naturally in the region.[7] Chumash tomol paddlers still use this region today to practice for their annual crossing to Limuw, also known as Santa Cruz Island.[8]

Levi Zavalla, who is Sʰamala Chumash and also from the Maidu and Chemehuevi Tribes, described how he visualizes what the coast looked like before colonization.

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[4] California Ocean Protection Council, 2025. *Roadmap to Achieving 30x30 in California's Coastal Waters*. https://opc.ca.gov/wp-content/uploads/2025/07/Roadmap-to-Achieving-30x30-in-Californias-Coastal-Waters-508.pdf
[5] California Department of Fish & Wildlife, 2022. *California's Marine Protected Area Network Decadal Management Review*, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=209209&&inline
[6] "Chapter 4: Historic Chumash Settlements on the Mainland Coast," in *The Chumash World at European Contact: Power, Trade, and Feasting Among Complex Hunter-Gatherers*, by Lynn H. Gamble, 2011, 4.
[7] John Peabody Harrington et al., *TOMOL: Chumash Watercraft as Described in the Ethnographic Notes of John P. Harrington*, Ballena Press Anthropological Papers ; No. 9 (Socorro, N.M.: Ballena Press, 1978).
[8] National Marine Sanctuaries, *Homecoming:Journey to Limuw.* https://sanctuaries.noaa.gov/earthisblue/wk259-stories-from-the-blue-chumash.html

> Here was the ‘aps right here– the houses, the tule houses– or was there kids playing on the beach? Some people gathering mussel shells or abalones? I visualize the tomols being out there in the kelp beds, fishing. It's bittersweet.[9]

Despite the impacts of colonization and displacement, Chumash people continue to maintain and revitalize ocean practices and traditions. Many of the interviewees described how these practices comprise a significant part of their life and identity today. Eva Pagaling, who is a S^{h}amala Chumash tomol paddling captain, explained the many lessons and values she has gained from tomol paddling as a central part of her life and upbringing.

> The feelings that I have when I'm paddling is it feels right to be there. And it [tomol paddling] asks you to be a stronger person in the things that you're facing and also gives you time to breathe and just take a break from the things that are heavy on your heart. I think it [tomol paddling] is just one of the ways, the canoe has been one of the ways that we've been able to access the medicine of the ocean for as long as we can remember. The most important person in our crew is the canoe and that helps us think outside of ourselves and actually move together as a community on the water.
>
> I think my takeaway is that we need to be paddling all the time. And we need to be able to be in that space with each other where the focus is supporting each other, just taking the individual out of the situation. We need more of that time together. We need to be able to curate and commit to spending time like that together as a community.[10]

Many of the Chumash people we spoke with shared that these coastal and ocean ecosystems are central to Chumash identity and culture. Interviewees talked about the importance of harvesting fish and other ocean animals for their traditional foods to feed their families and communities.Having healthy ocean plant and animal populations is essential to maintaining food sovereignty. Furthermore, access to traditional foods is not just for physical nourishment – even though traditional foods are most often healthier than alternatives – but is deeply connected to mental, spiritual and cultural wellbeing.[11] Levi Zavalla described certain harvesting practices.

> We do a lot of coastal foraging for mussels and limpets, keyhole limpets, trying to keep that traditional food intact, so that's one of the main ways we use the coast, for food, for feeding ourselves. We'll take it right home and cook it up and eat, have a feast and invite our families and friends to come.

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[9] Levi Zavalla, interviewed by Isabella Sullivan, July 25, 2025, SYBCI Culture Department Office, Santa Ynez, CA.
[10] Eva Pagaling, interviewed by Isabella Sullivan, November 6, 2025, Santa Ynez, CA.
[11] Nguyen, Cassandra J et al. “Framing an Indigenous Food Sovereignty Research Agenda.” Health promotion practice vol. 24,6 (2023): 1117-1123. doi:10.1177/15248399231190362 https://pmc.ncbi.nlm.nih.gov/articles/PMC12097726/#:~:text=While%20physical%20health%20impacts%20are,supported%20by%20Indigenous%20food%20sovereignty?

> My brother and I, we don't like to waste a lot of things. So if we're catching or harvesting these animals that have shells like the giant keyhole limpets or mussels or clams, we use those a lot in our jewelry. So it's not just, eat 'em and throw away, discard the shell.
>
> We'll make our money shells, our money beads, clam shells. We'll make abalone ornaments. And we try to stick with the traditional cuts instead of making different shapes and stuff. But yeah, we utilize everything that we bring back from the ocean, whether it's fertilizing the plants with the carcasses in our yard or cutting the jewelry, cutting abalone and clamshells for jewelry, or using them for gifts and trade. We don't just keep our abalone a lot, me and my brother. We go, "okay these ones we're gonna keep and cut with, and then these ones we're gonna gift with." Because we like to gift because that's just our way. [12]

Bobby Duran, who is Sʰamala Chumash, also spoke about how he harvests and uses ocean materials.

> I like to go there [the coast] and I like to gather things that I could use for my medicine or people that need it. Like I said, I gather shells and I make necklaces for people or there's different grasses out there and sea kelp and stuff like this. I like to use a lot of that stuff for my cultural things. We also gather a lot of tar that comes out naturally on the ocean, and we use that in a lot of our crafts and stuff. And our art, we take the tar and mix it with pine pitch and it makes a nice hard glue and when you cook it with the pine pitch, it eliminates all those ethanols so it doesn't have a sticky or smelly residue like oil would. [13]

Relationality to the coast, and the plants and animals within it, is inseparable from Chumash culture and spirituality. Hannah Lent, who is Sʰamala Chumash as well as Mono Lake Paiute and Yokut, spoke about how the ocean is at the center of Chumash life.

> I'm really thankful for where I come from and it's important to fight for where you come from. And I know a lot of Chumash people believe that in their soul. The ocean is so important to us whether you're here in Santa Ynez, in Santa Barbara, Ventura, Malibu, it's so important. And if that ocean wasn't there, if it was polluted for our people, our whole ecosystem would've collapsed. Our whole way of life would've collapsed. So it's so important for us to protect [the ocean]-- without it, we wouldn't be here. We literally wouldn't. [14]

Levi Zavalla described some of the many important Chumash traditions and spiritual beliefs centered around the ocean.

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[12] Zavalla, interview.
[13] Bobby Duran, interviewed by Isabella Sullivan, July 24, 2025, SYBCI Culture Department Office, Santa Ynez, CA.
[14] Hannah Lent, interviewed by Isabella Sullivan, July 25, 2025, SYBCI Culture Department Office, Santa Ynez, CA

> One of the main dances that they said every woman should know was the šutiwɨyɨš dance. And that dance comes from the island and we still practice that dance today. And just a few people only hold that dance unfortunately but that ties us to the ocean. We also have dances for the cormorant. We have dances for the swordfish. Obviously, we still paddle our tomols to the island, we're still connected in that way.
>
> And, we honor the ocean. We say the ocean is šuyuwačʰɨši, which just means, the ocean is of the spirit world. I thought that was beautiful seeing that."[15]

We also heard that the ocean is an important source of healing for Chumash people, as Bobby Duran describes.

> All those things [respecting the ocean] are like what our ancestors used to think about too. Maria used to say that the ocean is medicine. That was one of her things she used to say. And I remember being in my teenage years and feeling depressed and going out and just laying in the ocean, and getting out and feeling better.[16]

Bobby also talked about how reciprocal his relationship with the ocean is - how it provides healing to him, and at the same time he takes responsibility for the ocean's wellbeing.

> We sing songs. We talk to the ocean. We make sure that we go out there to have fun, but we're going out there to heal ourselves 'cause we struggle with whatever goes on with what life throws at us. We go out there to heal ourselves and we go out there to make sure the ocean's doing good and we talk to the ocean and all of its animals and we make sure we're giving back what it gives to us, in that sense.[17]

Improving ocean health in the waters within and surrounding the Mishopshno SMCA would support the essential Chumash cultural practices that are inextricable from peoples' identity and contribute to their physical and mental wellbeing.

Historic Abundance and Biodiversity Decline

Many of the interviewees described changes in the coast's ecological condition that are informed by their deep relationship to the coast and the ocean through their own lived experiences and through their ancestors' accounts. They explained the vastly different baselines between Indigenous ways of knowing and Western knowledge when it comes to the ocean's health. These different baselines are because

[15] Zavalla, interview.
[16] Duran, interview.
[17] Ibid.

traditional knowledge encompasses a drastically longer timescale than Western knowledge. The Chumash people we spoke with noted the significant and concerning decline of biodiversity in coastal and ocean ecosystems.

Bobby Duran recounted how coastal plant and animal populations have diminished from how his ancestor Maria Solares had described them.

> We have our, like I said, our Maria stories and her accounts of how the ocean was not like how it is [now] how we see it. How they seen it, how her generation seen it, how they gathered and where they went to gather and stuff like that. Those spots aren't around anymore.[18]

Levi Zavalla shared in detail the changes he has seen at the beach over the course of his life.

> When you go up the coast, 'cause that's the southern current, when you go up the coast in the north, you see a lot of these plants and animals still around, but just not as prevalent [near Santa Barbara]. And, that's just in my lifetime of going to the beach [near Santa Barbara] so much and just seeing all these tide pools and now you go to the same ones and they're basically empty now.
>
> When I was a kid, we'd go on the piers in Santa Barbara, Goleta, Avita Pier and we would catch fish all day. And, I go now to the piers and you don't catch anything, even bait fish, so it's just the waters are overfished. There's too much population here that just go out and fish. And so it's, you see those, it's a big difference since I was a kid. And that's why we mainly fish up north in Vandenberg because there's not a lot of public out there. And you can still catch these fish that you wouldn't be able to just a little further south.[19]

Chumash elder Julie Tumamait-Stenslie, who has direct lineage to Mishopshno Village, also shared these concerns about the consequences of overharvesting.

> The more people you have, the greater the taking. We used to go to Pismo Beach all the time. My dad would take us out there to get the Pismo Clams. And they regulated you. You could not get 'em under a certain size. Nobody's watching anymore and people are getting away with taking undersize everything. Again, that hurts the reproductive cycles. It doesn't give these animals a chance to just be them. And they all have a purpose there. They all have a reason for being just like we do.

[18] Duran, interview.
[19] Zavalla, interview.

> So it's the same thing. It's a greed, it's a misalignment of priorities. Is it just for your benefit? Or is the benefit for what we say seven generations ahead? Most people don't like hearing that.[20]

Eva Pagaling also spoke to the ways declining marine populations have affected her family's gathering and harvesting abilities, as well as the increase in boat traffic near Santa Barbara.

> When we have tomol practice, I definitely noticed from when I was younger to now, just the amount of people that are out at the harbor and the amount of traffic that's coming in and out has increased a lot. I'd say also whenever my dad would go gather mussels, the areas that he would go gather, started slimming over time. It seemed like he could pull off anywhere and go gather mussels. And now it's down to maybe one or two spots that he goes to in particular, like pretty regularly.[21]

Sofia Mata, who is Sʰamala Chumash, had similar sentiments about the way she's seen changes in the ocean.

> From the stories that I used to hear from my grandparents, they'd be talking about certain things that would happen that I never really got the chance to see, like certain stories where they would go fishing and they would see a certain amount of fish and then I'm going to the same area and I don't see the same things. So like another example would be, growing up I remember I would – every time I would go to the beach – I would see dolphins, you'd see a pod of dolphins. And it's so rare for me to go see them now… And now all there are is boats, a lot of fishing boats. So many fishing boats. And then a lot of 'em are recreation, so people just going out and just driving around out there.[22]

The Necessity of Tribal Management

The millenia-long relationship between Chumash people and the Central Coast means that, for many Chumash, they themselves are an integral part of the ecosystem. Chumash people were a part of a thriving and abundant ecological community for many thousands of years prior to settler colonialism. The Chumash connection to the ocean is largely relational, rather than extractive or primarily commercial. This interdependency of the coast, ocean, and Chumash peoples underscores not only how important the ocean is to Chumash identity but also to how important Chumash people are to a thriving ocean.

Sofia Mata explained,

[20] Julie Tumamait-Stenslie, interviewed by Isabella Sullivan, August 17, 2025, Carpinteria, CA.
[21] Pagaling, interview.
[22] Sofia Mata, interviewed by Isabella Sullivan, July 24, 2025, SYBCI Culture Department Office, Santa Ynez, CA.

> The way I viewed our people, I viewed them as a part of the ecosystem. So once you take away us, or once you remove us out of the ecosystem, I think everything shifts then. Because removing us as stewards of the land or even just a part of the ecosystem itself, then everything shifts and then it's almost impossible to get back to where it was before if we aren't allowed to be in that same position that we were in before.[23]

Hannah Lent made a similar point.

> It's like a string, you pull it and it all comes together. And it's all connected. And if you remove one part, it's gonna mess up everything. And the Chumash people are a part of that. We're not outside looking in on this, this whole ecosystem. We were ingrained in it and it won't flourish unless we're actively engaging. And I say specifically Chumash people because we know. We know.[24]

Eva Pagaling also touched on the stewardship values and responsibilities that she learned from her relatives.

> We've always been told that it's our job to take care of the ocean. Ever since we were little, especially around the canoe. That's our job. We need to go out and take care. Then being around different community members and seeing what certain aunties do when they're gathering seaweed. And then what other aunties do conversely, on the terrestrial counterpart when they're on the land gathering and how they apply those same values and practices when we are gathering and caretaking.[25]

Protecting and restoring important ecological and cultural resources requires Indigenous knowledge and stewardship. Many of the interviewees described the Chumash concept of not taking more than one needs, and specific cultural protocol around subsistence. Bobby described how Chumash peoples had their own ways and rules to make sure they weren't taking too much fish, and how that information can help them effectively steward their own territories today. He also explained how ocean protection efforts should never exclude the Indigenous peoples and Tribes whose territory it is.

> All that stuff [stories from ancestor Maria] from when I was a kid made sense, about respecting the ocean and taking stuff that you might not want it to take or, you taking things from the ocean, how you take 'em, when you take them, 'cause even though there's these laws that we have now, we still had those kind of laws back in the day. Like when you should go get things or how you should go about getting them, or if you took too

[23] Mata, interview.
[24] Lent, interview.
[25] Pagaling, interview.

> much, or did you overfish? Did you take too much fish last time? Or even though you just caught maybe two or three fish, like maybe that was too much.
>
> All those things are what our ancestors used to think about too. Maria used to say that the ocean is medicine. That was one of her things she used to say…
>
> A lot of times what happens to Native Americans is they do get invited to these discussions and boards, but then they're still left out of whatever they're talking about. It's just like checking a box, oh they're checking a box, "yep, we have 'em here, we did our part" kind of thing, but I don't know. I think that, as the original stewards of the land, we should be taking over those kinds of things… It's nice talking about [this] because I love the ocean and I wanna see it protected. But I wanna also see involvement with our people. And, when you protect something, I don't want our people to feel like they're excluded from the protection. So it's like I said earlier, we, I, use the ocean for healing. If I wanted to go to an area like a protected area, I would like to use it as the symbiotic relationship that sanctuaries are trying to create. And as Chumash people we are part of that. All of that together. And our presence there is probably needed.[26]

Sofia Mata had similar sentiments about Chumash fishing and harvesting protocols, and how that same respect and vigilance would be carried through into marine stewardship today.

> I also know that we were cautious about fishing. We didn't overfish. We were very responsible in that sense. And we were respectful of our surroundings and everything that we were doing... Because a lot of it has to do with the ocean, keeping track of fishing. We were cautious about our fishing, we were cautious about the sea mammals that we would take.
>
> I would love to have our people regain stewardship. To be given the access to go to these areas, to hunt, to harvest… I feel, in a way it [the lack of authority in managing ancestral territories] is demeaning because it feels like someone's telling me that I don't have enough respect for our people's traditions and that we're just gonna go and take and not be responsible about it. Having that access to go back and to help with fires, help with restoring plants, help with removing invasive plants. Just being able to talk about or have an inserted opinion when it comes to overfishing.[27]

Recognizing the intrinsic need for Tribally-led management and Indigenous stewardship of ocean resources, the Mishopshno SMCA petition calls for Tribal co-management and continued

[26] Duran, interview.
[27] Mata, interview.

access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for all Chumash people.

Visions for the Future

While understanding that a formal co-management plan between Tribes and the state of California would not be created until after designation, the Chumash people we interviewed expressed what they hoped the Mishopshno SMCA would achieve, as well as broader dreams for the future of Tribally led marine conservation and stewardship.

Levi talked about the opportunity the Mishopshno SMCA proposal holds for revitalizing a special area of the South Coast.

> These areas need to heal themselves. They need to revive themselves and that's where the co-management comes in, where we can go help 'em. A lot of our areas on the coast, like I said, are bare. And if this [the MPA designation] goes through and we get this area where we can protect it and, say 20 years down the line what it could potentially be then?[28]

Hannah Lent also described a similar vision for the future.

> When you feel something like that and you have something like that, it needs to be preserved. And I was reading something and it talks about how all the flora and fauna and everything there that used to be there is gone. So the way it [the area proposed for protection] looks right now isn't true, isn't correct. And we have the ability right now to correct something that's wrong. Whether that's in the ocean or on the shore, whatever it is, there's an ability to make it what it once was.
>
> It [the coast before colonization] is amazing. I can only think about it, in my mind and picture what I believe what it once looked like, but it deserves that respect and it deserves its recognition. We have the ability to protect it.[29]

Sofia Mata tied the ability to protect these places and animals to Chumash identity and experience.

> The animals that have been here should have a right to remain here….they shouldn't have to fight for the area that they're inhabiting….They should be protected. It's hard to say because, our people, we weren't protected like that. So if we can have the opportunity to

[28]Zavalla, interview.
[29] Lent, interview.

> in turn do that for something else that we couldn't do for ourselves, we're gonna advocate for that.[30]

Julie Tumamait-Stenslie had similar thoughts.

> So to protect the waters, definitely, our stories connect us to the life that's in the water, that sacred water that we see and that we're in, keeping it clean for those relatives who live in that water, who migrate back and forth, and perhaps even at some point that may spread into the land. People are starting to get it.

Emma Lombardi, who is S^{h}amala Chumash, described how she wants to see any part of their ancestral territory protected if there is an opportunity to do so.

> It [the area proposed for protection] is near and dear to our heart. So no matter how far we are from it [currently], we still had some connection no matter what. If we're able to protect any part of our land, then I want to be part of that.[31]

Eva Pagaling founded a non profit called Ocean Origins for the purpose of providing training and resources to build up Indigenous capacity to carry out marine stewardship and management responsibilities. She discusses the ways in which her community is not only ready, but deeply excited, for a prospective Mishopshno SMCA designation.

> Really it's all about being able to reconnect to the places that we know we're meant to be taking care of. Without our relationship to those places, a lot of who we are can get lost, or just be asleep.
>
> For us to be able to have that – be who we are, we need to have that connection and develop that relationship with those areas and take care of them in the ways that they're meant to be taken care of. I hope that if it does get approved, we can go back there and start helping and start teaching. I would see it as a teaching place. We're ready as a community to be able to manage that area and we have the understanding that as our culture evolves, the tools and the methodologies that we need to use to be able to keep up with the times. We have access to those now as well. And we have a lot of young people who are eager to help, who are ready, who are able, who are just chomping at the bit to be, to be home with each other, to be helping and to be in a space where we can be ourselves. Yeah, we're just, we're good to go!

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[30] Sofia Mata, interviewed by Isabella Sullivan, July 24, 2025, SYBCI Culture Department Office, Santa Ynez, CA.
[31] Emma Lombardi, interviewed by Isabella Sullivan, July 25, 2025, SYBCI Culture Department Office, Santa Ynez, CA.

The co-sponsors are hopeful that designation of the Mishopshno SMCA would help to advance Tribal co-management and stewardship of the region's coastal and marine resources. Designation of the Mishopshno SMCA would honor the cultural and historical significance of the area for Chumash people and would aim to revitalize the area's biodiversity to historical levels that are detailed in traditional knowledge.

Thank you for your consideration.

Sincerely,

Isabella Sullivan
Next Wave Oceans Fellow, Nature
Natural Resources Defense Council

Sandy Aylesworth
Director, Pacific Initiative, Nature
Natural Resources Defense Council

Margaret Brown
Senior Director, Equity and Community Partnerships, Nature
Natural Resources Defense Council

From: Matthew Bond <[redacted]>
Sent: Monday, January 19, 2026 8:11 AM
To: FGC <FGC@fgc.ca.gov>
Cc: Tonie Bangos <[redacted]>; Devin O'Dea <[redacted]>; Christopher Killen <[redacted]>
Subject: Comment Regarding MPA Petitions for the February 11-12, 2026 Commission Meeting

Dear members and staff of the California Fish and Game Commission,

Please find attached our letter representing the voice of a broad coalition of individuals, organizations, businesses, and scientists with opinions and related rationale on each of the Bin 2 MPA petitions.

Thank you for your time and service,

Matt Bond
Allwaters Protection and Access Coalition

January 2026
Coalition Letter on Bin 2 MPA Petitions

January 2026
Coalition Letter on Bin 2 MPA Petitions

To the California Fish and Game Commission (FGC) and Department of Fish and Wildlife (CDFW),

This letter serves as a joint comment, representing a mass consensus reached by the undersigned groups and individuals representing tens of thousands of stakeholders from recreational, commercial, and scientific backgrounds on all of the Bin 2 MPA petitions. While some of us may submit our own individual comments in addition, or have already, we would like the FGC and CDFW to understand that this diverse community of statewide stakeholders are all united regarding the following comments on these petitions. We all would like to share our common beliefs outlined in the below letter to you as this united group. With the adaptive management process of our MPA network underway, we ask to please take the below input deeply into account when determining the outcomes of the following bin 2 MPA petitions.

Petition2023-14MPA – Accept

Petition 14 proposes the allowance of commercial urchin take inside of a group of SMCAs that already have allowable limited-take restrictions, with the exception of one no-take SMCA. This petition has not been amended since submission. We believe this petition's rationale to have enough merit to warrant its acceptance in part or in full.

At a time where there are mass interests in helping kelp forests regrow, allowing sea urchin take in areas already partially open to other fisheries is a minimally invasive step we can take, especially in SMCAs that already allow some forms of take. By being allowed to harvest and remove sea urchins that are currently protected in these areas, we allow the kelp the chance to grow back. While we cannot locally control global factors affecting kelp growth such as water temperature or swell meaningfully, we can still promote regrowth of kelp by being allowed to at least remove one of kelp's largest predators, the sea urchin.

Per SeaSketch, we may accept this petition whilst also maintaining the same relative level of protection (LOP) in six of the eight total SMCAs in the proposal: Double Cone, Salt Point, Stewarts Point, Sea Lion Cove, Naples, and Anacapa. This means any MPA connectivity benefits will be maintained as is in the current network. For the Point Dume and Point Vicente SMCAs, while the MPA LOP does drop, we believe the allowance of sea urchin take in these SMCAs will greatly benefit the entire area through restored kelp growth, and additional workable area for local urchin divers. However, we understand if a loss in connectivity for these two areas is something the commission is against, that just these two MPA be excluded. At a minimum, this petition should be granted for the SMCAs where the network as a whole does not lose any existing connectivity benefits.

January 2026
Coalition Letter on Bin 2 MPA Petitions

Petition2023-15MPA-AM2 – Accept

Petition 15 proposes allowing limited take of pelagic or highly migratory species at three joint State-Federal MPAs at the Channel Islands. The petition was amended twice, and proposes several possible options for limited-take of pelagic finfish or highly migratory species (HMS). The petition brings forward three gear types: hook-and-line, spear, and harpoon swordfish; additionally, it includes possible nearshore-offshore MPA options to mitigate bycatch in the more biodiverse nearshore areas and maintain high MPA LOPs for network connectivity. While it is up to the commission and department to determine what the best combination of choices may be, we all believe this petition should be accepted under a preferred option that retains a high LOP for these MPAs, maintaining existing ecosystem level protection/connectivity, that consists of an offshore SMCA and nearshore SMCA or SMR.

The petition is founded on a longstanding scientific basis and MLPA goals that the MPAs in our network are primarily intended to benefit our nearshore waters and non-pelagic species the most. This has been established since the MLPA MPA Master Plan (MMP) in 2008 where MPA benefits to pelagic species were explained to be weak at best, rather focusing the network toward non-pelagic species that benefit the most from MPAs per the MMP documents. This led to the coastal network outside of the Islands process allowing some form of pelagic access in over 40% of our existing MPAs, and no-take in the remaining 60%. Of the currently 60% of MPAs that are no-take, most areas are nearshore, cover predominantly shallow water, and would not provide much pelagic benefits if they were even partially open. The approximately remaining 40% of the network that is limited take, most of which is pelagic take, are set in areas where pelagic effort is reasonable enough to avoid any nearshore or bottom interactions, or does not allow hook-and-line, just spear.

This sets a clear precedent, based on the science, that we can allow reasonable pelagic fishing access in the areas where it makes sense to allow it, and fully protect areas where pelagic fishing is less realistic or interferes too much with nearshore areas. This precedent was again reiterated in the 2016 MMP in a regional objective that explicitly states to allow for forms of pelagic take across the network in all bioregions, something the coastal MPA phases included but the Channel Islands network specifically lacks. The commission then upheld this mass precedent in 2020 when it denied a petition to create an MPA for white sharks, citing specifically that MPAs in our network are not meant for highly migratory or pelagic species, they are for ecosystem level protections, which can still exist in pelagic allowed MPAs. We simply ask that this precedent continue to be upheld for the MPAs that can reasonably allow for pelagic or HMS take and network maintain connectivity. This has no better use case to be applied than at the Channel Islands. That region of the network was designated prior to all of the primary MPA guiding documents, covers mostly offshore waters, and provides the least pelagic access of all the MPA designation regions, a clear case of adaptive management.

Because the Channel Islands MPA network is the oldest region in the modern network, designated now over 20 years ago in 2002, it pre-dates the coastal MLPA implementation phases, the MLPA LOP frameworks, both MPA Master Plans, and all other frameworks and processes that established this pelagic allowance elsewhere during the 4 coastal phases. In the early 2000s during the Channel Islands process, the primary concerns driving the island MPAs involved groundfish species and recovering their overfished populations. This fact was a main driver in justifying the federal sections of the island MPAs, as the federal expansions cover deep water rocky bottom or reefs where groundfish frequent. Today, federal outlooks of no-take MPAs are almost non-existent. With the exception of the Channel Islands, federal protected areas off the west coast only protect non-pelagic bottom dwelling species (groundfish), and allow pelagic fishing access, aligning exactly to what the petition proposes.

We believe this to be an adaptive management case of modernizing MPAs that predate all guidance documents, and updating them to better align to these well established frameworks in the same way the rest of the network already has. In the case of pelagic access, this shift is clearly seen as the more-modern coastal MPAs allow significantly more pelagics access (40%), compared to the Channel Islands MPAs (3%). In the case of The Footprint MPA specifically, it is the only MPA in the State that is disconnected from land, is entirely deeper than 50m, and has no limited take allowance for pelagics. The Channel Islands MPAs as a whole are justifiably the most equipped to handle pelagic allowance in them, especially offshore, due to the depths covered allowing a massive buffer between pelagic fisheries in the mid to upper water column and non-pelagic fisheries on the bottom. Any take beyond State waters in the federal portions of these MPAs would affect the nearshore region even less than already existing State pelagic allowances present in the current coastal network. Most of the federal portions of these MPAs are well over 1000 feet in depth, and in some cases over 4000 ft in depth.

Per SeaSketch, LOP tiers from the original MLPA state pelagic take maintains MPA connectivity due to the take allowance’s high LOP in offshore waters. At the islands specifically this is seen as only allowing hook-and-line take in waters deeper than 50 meters (164ft), with harpoon or spear gears allowed anywhere due to their high selectivity and lack of any bycatch. A high LOP can be maintained and connectivity still upheld if the petition is accepted with the proposed “nearshore” SMCAs or SMRs at Gull Island and Santa Barbara Island that restrict nearshore hook-and-line, along with any SMCA option in The Footprint and the proposed “offshore” sections of Gull Island and Santa Barbara Island. With all of this precedent and SeaSketch LOP information in mind we believe there is more than sufficient rationale, federal and state evidence, and MLPA/MMP support to allow for this adaptive management change.

January 2026
Coalition Letter on Bin 2 MPA Petitions

Petition2023-16MPA – Modify then Accept

Petition 16 requests the allowance of the commercial take of salmon by troll in two SMRs in the northern bioregion, Bodega Head and Stewarts Point, making them SMCAs. The petition argues similarly to petition 15, on the lack of interference allowed pelagic access would cause. While we do stand by this petition's core arguments, we also believe that this allowance should be accompanied with a similar recreational allowance of salmon by troll in these MPAs too.

Recreationally or commercially the salmon troll fisheries mirror each other with similar gear use, lack of gear conflicts with unintended species, and lack of interactions with the bottom environment due to the nature of the troll gear always moving and being in the upper section of the water column. There are no reasons to not allow recreational troll access in these areas as well because of this. This is further supported by the bordering and nearby pelagic allowed SMCAs in the area giving both recreational and commercial allowance for salmon trolling. A joint allowance would also help to solve any possible confusion on the water of only a specific group being able to troll in the area while others may not, reducing any possible enforcement problems.

Per SeaSketch, the LOPs of these areas as SMCAs allowing any kind of salmon trolling retains existing MPA protections for their respective connectivity benefits. While these MPAs in the northern bioregion are more-modern of MPAs, coming after initial MMPs, MPA frameworks, and processes, unlike those in Petition 15, we see this change allowance as reasonable for consideration. With the recreational troll allowance added to this petition, we see its arguments as more equitable and in-line with existing MPAs in the surrounding northern bioregion of the network.

Petition2023-18MPA – Accept

Petition 18 makes several requests across the Santa Barbara Channel to 6 MPAs in total, and some requests were non-regulatory requests. We support all of the prescribed changes in the petition to better regulatory language, provide better MPA regulation clarity through color corrections, and to make fine tune changes to better the overall MPA network. Of all the requests in petition 18, the most controversial is the creation of a shore region SMCA in the Vandenburg SMR. This would be called the Vandenburg SMCA and would allow shoretake of finfish. This case of a shore allowance is a unique case for our MPA network, as the bordering military base with the SMR allows shore fishing already anyway. This shoretake allowance would clear up any enforcement confusion by the public for the SMR and give some access back to the public in general. We believe this petition's regulatory and non-regulatory requests should be accepted in full.

Petition2023-19MPA – Reject or Modify

Petition 19 requests the creation of a tribal co-managed SMCA at Morro Bay that only allows for the recreational take of finfish and invertebrates except rock scallops and mussels by hand harvest, also including a tribal take exemption within the SMCA. We believe the petition should be either rejected or amended to allow for more general recreational and commercial take as well.

We believe tribal co-management to be a great step forward in managing California's waters and should be present in all MPAs; however, creating a new MPA that restricts exclusively commercial groups and most recreational fishing access from such an essential area should not be warranted. The commercial blocks overlapping the proposed SMCA account for 6.2% of Morro Bay's landing revenue alone. More specifically, these blocks represent 25% of the area's squid landings, 8.8% of the groundfish landings, and 15% of the area's salmon landings, per the MFDE. While not an exact correlation, recreational access in the area is likely comparable (with the exception of squid) and will likely be equally affected in the MPA regions, as this petition affects all fisheries not involving direct hand harvesting.

Additionally, there is concern that the proposed offshore wind energy program has its proposed electrical lines connecting the Morro Bay power bank stations to the offshore array crossing through the SMCA. If passed, this would need to be addressed and an additional allowance added.

Petition2023-20MPA – Reject Nearshore and Clarify/Accept Offshore

Petition 20 requests changes to the MPA cluster, the nearshore and offshore MPAs, at Point Buchon. The petition requests the offshore SMCA allow the hand harvest of finfish and invertebrates except rock scallops and mussels, allow the maintenance of artificial structures under the correct permits, and provide a tribal take exemption for federally recognized tribes. However, it is unclear if these requested allowances to the offshore SMCA at point Buchon are replacing or adding to existing recreational and commercial allowance for the take of albacore and salmon. Pursuant to the allowances being additive and not replacing the existing take allowances in the offshore MPA we support the request for the offshore region of the MPA cluster to have the added take allowances. This example in the offshore region is a clear example of how tribal components can be added to the existing network, not requiring creation of more MPAs to involve tribes.

Regarding the petitioner's request to the nearshore SMR being expanded, we believe this request should be rejected. The expansion of only the SMR section of the Point Buchon nearshore/offshore cluster would unnecessarily remove all access from the added area. The justification for this addition comes from MPA Collaborative meetings citing enforcement concerns, stating that moving the northern boundary to the physical

point will provide a better reference for enforcement. The core reason the existing MPA does not go to the physical point on land is because the nearest whole decimal degree value was used as the northern boundary instead, following MLPA guidelines. This usage of a round Lat/Long number for an MPA that does not experience much shore fishing opportunity is supported by the MLPA MPA design criteria to explicitly help, not hurt, enforcement. The current northern boundary gives those fishing beyond shore an easy to understand GPS reference point to know where the boundary is. Additionally, expanding only the nearshore SMR may cause further enforcement problems with the offshore SMCA remaining its original size. The expansion of the nearshore only leads to a case of an unevenly sized MPA in the nearshore and offshore regions.

Petition2023-21MPA – Accept

Petition 21 requests the Pyramid Point SMCA in the northern bioregion be modified to remove its existing recreational allowances for take of surf smelt and give additional tribal exemption to the Tolowa Dee-ni' Nation on top of its existing tribal exemption. The petition also requests the border of the MPA be moved south to the true CA-OR state boundary line, slightly shrinking the MPA.

While this petition does remove some recreational access to take surf smelt, that access was already relatively limited and small scale. The change to the border to shrink the SMCA to align to the actual state border clears up any possible confusion or issues the overlap currently causes. Overall we are supportive of this change, and addition of another Tribal component to the existing Pyramid Point SMCA.

Petition2023-23MPA-AM1 – Reject or Modify

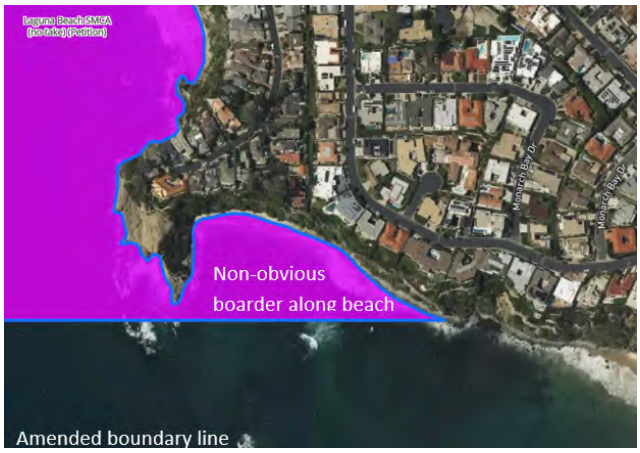
Petition 23 requests multiple changes to 3 existing SMCAs, the Carmel Bay SMCA, Pacific Grove SMCA, and the Edward F. Ricketts SMCA, requesting all three SMCAs become closed to take of finfish during “active kelp restoration permits” and to create a new SMR at Tankers Reef, the area of this SMR was reduced during amendments.

We believe the petition has reasonable goals, restoring kelp, but goes about this in the incorrect way. Regarding the specific MPA changes requested, we believe this petition should be rejected or modified. Acceptance would come at the additional loss of recreational fishing access to these SMCAs. Fishing has no significant impact on kelp restoration compared to environmental factors (e.g., water quality, water temperature, swell) and would be closed when a “kelp restoration permit is active.” This also raises further enforcement concerns as regulations would effectively be in constant flux depending if a permit is active or not, there would need to be new paths created to inform all on the water when said permit is active or not. Additionally, existing restoration efforts at Tankers Reef would immediately stop if an SMR is designated there for the lack of allowable take inside of an SMR, even the reduced in size SMR.

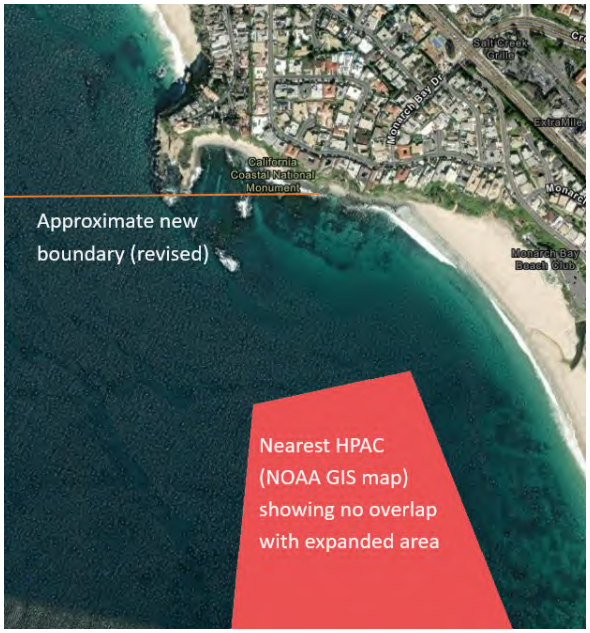
If the petitioner wishes to accomplish the outstanding goals of this petition, then a similar approach to that in Petition2023-14MPA should be considered. Such an approach could consist of keeping the 3 SMCAs as SMCAs with the same allowable take regulations, but only adding a new allowance for the recreational and commercial take of sea urchins, removing the finfish closures during "active permits." Regarding Tankers Reef, we believe no MPA, SMR or SMCA, should be designated there as existing restoration efforts would be able to continue there without requiring any closures or special allowances be made inside of a new MPA. Leaving Tankers Reef as is will also allow any future restoration methods to be deployed at the location without having to modify the SMCA allowances again as we continue to learn how to restore our kelp forests.

Petition2023-24MPA – Reject

Petition 24 requests expanding the existing Laguna Beach SMCA into the Dana Point SMCA. We believe Petition 24 should be rejected for several reasons. Petition 24's core argument claims enforcement concerns of the MPAs by lifeguards, when in fact, the primary enforcement of the MPAs is warden officers. Wardens are the only individuals that may issue citations for MPA compliance and are most notably, not bound by city limits. The idea of moving this border to allow for better enforcement will only create more of an enforcement problem due to where the proposed border lies versus the existing one. The existing border of the Laguna SMCA and Dana Point SMCA is a rocky point, a physical barrier between two areas. This allows the border to be clear as it is marked by an obvious, physical landmark, this is a guiding objective of the MLPA in MPAs that justifiably have a large shore fishing presence. The proposed new border would sit along the mean high tide line in the middle of a rocky beach. Simply put, removal of a physical barrier landmark to an invisible line on a public beach would only create more of an enforcement compliance problem, not reduce it along shore. (See Below images)



The petition then cites the Sustainable Fisheries Act of 1996 and its 2002 update where essential fish habitats (EFH) and habitat areas of particular concern (HAPCs) were designated along the west coast of California, Oregon, and Washington.



Essential fish habitats (EFHs) are defined by NOAA as areas where specific fish species, including groundfish, pink salmon, king salmon, coho salmon, coastal pelagic species, and highly migratory species, can feed, spawn, or grow to maturity. These habitats are extensive, the three EFHs overlapping the proposed expansion area—groundfish, CPS, and HMS—cover the entire coast of California, Washington, and Oregon. Because of their broad geographical scope, EFHs alone do not indicate a need for MPAs off the coast, or this proposed expansion.

Habitat areas of particular concern (HPACs), as the name implies, are sections of the EFH that are more important in providing the ecological functions that the general EFHs offer. These are more selective in their designation and display highlighted areas of concern within the EFHs. While these areas are more important in participating in these biological processes, the petitioner's proposed MPA expansion does not overlap with any existing HPACs (see above image). The arguments of the petition involving any EFHs or HPACs to protect this additional area are irrelevant for these reasons.

The petition additionally presents a rationale similar to that of Petition 2023-33 regarding the protection of kelp beds. It claims that conserving these areas is essential for the health of kelp forests. However, like the counterarguments we will see in Petition 2023-33, it is important to note again that fishing effort and so-called “anchor drag” does not significantly reduce kelp biomass; rather, factors such as water temperature, water quality, and swell conditions primarily drive changes in the kelp population. Additionally, any concerns raised in the petition about “anchor drag” damaging kelp beds would equally apply to non-consumptive vessels, not just fishing boats.

The petition references the Marine Mammal Protection Act (MMPA) concerning potential marine mammal entanglements from lobster traps in the area. While recreational and commercial lobster fishing occurs in the region, there have been little to no reported entanglement incidents involving whales or dolphins locally, showing in reality there is little need for concern. While it's important to acknowledge the possibility of such events, the absence of previous occurrences suggests that the likelihood of entanglements is extremely low. Furthermore, if the area were to be protected, lobster traps would simply be relocated, meaning the risk of entanglement would persist

regardless of where the traps are ultimately placed. Lastly, the adoption of ropeless fishing technologies, such as those developed by Sea Sonics, indicates a future where entanglement issues could be further mitigated.

Concerning the MLPA itself, it should be noted that the proposed expanded area would give the MPA an “L-shape.” This shape is specifically called out in the MLPA as a poor MPA design for enforcement and is just another reason we have concerns for this petition.

Petition2023-27MPA-AM1 – Reject

The original petition 27 and its amendments only look at lobster taken from the Anacapa SMCA. We believe this request should be rejected. Petition 27, similar to petitions calling for protections to increase kelp beds, calls for additional protections at the Anacapa Island SMCA, the difference being that 2023-27’s focus is on eelgrass, not kelp. While a trap sitting on the bottom does have a larger footprint than a pelagic hook and line configuration which is also allowed in the SMCA, traps fished in the area are not significantly impacting eelgrass beds due to there already being a 20 foot depth closure for traps around Anacapa in its Special Closure. This area contains already a large amount of the existing eelgrass beds as the SMCA and special closure overlap making the key rationale of this petition redundant as protections are effectively already in effect.

Petition2023-28MPA-AM1 – Reject

Petition 28 requests the establishment of a new MPA around Point Sal. This MPA would significantly impact local fisheries, recreational and commercial, despite the petitioner's claim that the effects would be minimal. For this primary reason we believe the petition should be rejected, even as amended to allow for shore based take of finfish.

The petition includes an economic analysis of the proposed area but overlooks the devastating local impacts this MPA would have economically. While the petition accurately states that the overlapping commercial fishing blocks contribute to 1.1% of the central coast's total landings by value, it fails to consider the actual local implications of that 1.1% and what it represents. Using the same time range (2012 to 2022) on the MFDE, the local port nearest to the proposed MPA, Port San Luis/Avila, derived 28.12% of its total commercial revenue from the overlapping blocks 631 and 632. More specifically, 25.92% of the port's groundfish revenue and 57.79%, over half, of its crab revenue came from these areas. If recreational effort even somewhat mirrors commercial effort in the area, not only is Point Sal relevant commercially, but recreationally too offshore. Establishing an MPA at Point Sal will significantly harm the community of Avila and other nearby ports, threaten local businesses, harm or remove

people's sources of income, and remove recreational and subsistence access to the area by boat.

Providing shore based take of finfish would allow for beach anglers to continue fishing as they have been, but would do so at the loss of all offshore activity. More notably, this also results in a drop of the LOP of the SMCA to moderate-low. This LOP ranking per the MLPA fails any connectivity requirements making the final proposed SMCA a protected area that does not add to total MPA network connectivity. This brings into question the main argument of the petitioner to add this MPA in order to maintain MPA connectivity, as the final amended SMCA would not accomplish this.

<u>Petition2023-29MPA-AM1 – Reject</u>

Petition 29 requests a new MPA be created at Carpinteria. This MPA would be a tribally allowed SMCA that would be closed to non-federally recognized tribal fishing (general recreational and commercial fishing); the petition was amended to reduce its overall size and allow shore-based take of finfish. The petition's three primary arguments for the new SMCA are to meet habitat connectivity/MPA spacing requirements, to protect habitat surrounding juvenile white shark grounds, and to allow for tribal access. While tribal co-management of all California MPAs should be considered, we believe for the following reasons this specific MPA proposal should be rejected.

Regarding habitat connectivity, the petition asserts that the spacing of the existing MPA network exceeds the recommendations set by the MLPA scientific advisory team, which suggests a minimum spacing of 31 to 62 miles. The petition argues that the nearest coastal MPAs, Campus Point and Point Dume, are too far apart, claiming they are separated by 63.8 nautical miles or 73.4 miles (Image 1).

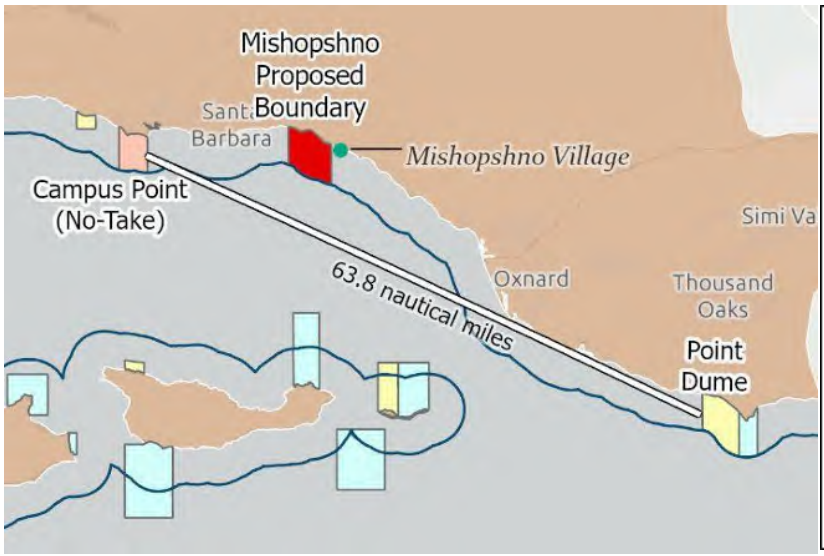


Image 1: Petition 29's image displaying proposed area and <u>claimed</u> spacing between existing Pt. Dume and Campus Point SMAs to be 63.8 nm (73.4 mi), which, if true, would exceed the southern MLPA MPA spacing requirements.

Note: the shown MPA is the original, pre-amendment size.

Discussions with the CDFW clarified that MPA spacing is measured by the, “shortest distance over water between two MPAs.” When measuring the distance between Campus Point and Point Dume, we find that it is in fact less than 62 miles, indicating that the current spacing distribution is adequate along the coast (see below Image 2).

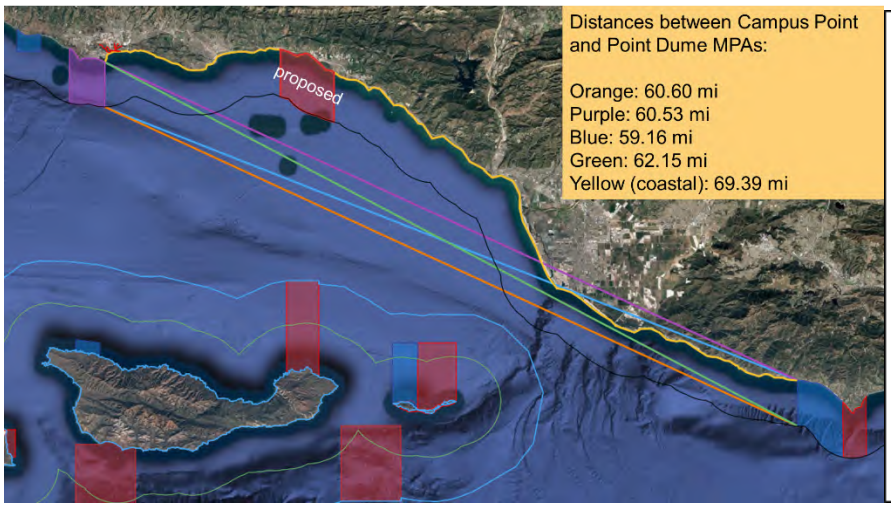


Image 2: Actual spacings between nearest existing MPAs around the proposed site. All but one straight line measurement exceeds 62 miles. The length that would be used by CDFW according to their provided input would be 60.60 mi (orange line) which falls within the spacing requirement.

Following the CDFW and MLPA guidelines, the shortest water distance between the two existing MPAs is ~60.60 miles, viewable by the orange line. This distance falls within the 31–62-mile MLPA spacing requirement. None of the provided measurements, including a measurement along the coastline (yellow) exceeded 73.4 miles of separation as the petitioner claims, again bringing into question the purpose for the new MPA if connectivity is already met.

In addition, the provided shore based take of finfish does allow for some form of recreational take but this now raises connectivity concerns. As mentioned in previous petitions, allowance of shore fishing of finfish reduces an MPAs LOP to moderate-low, losing its MPA connectivity with the network, this is confirmed by SeaSketch. Connectivity was a major reason for this MPAs proposal. With connectivity now lost due to these allowed take methods begs to question the purpose for this implementation in the first place if its foundational goals are not even accomplished. The LOP chart for the southern bioregion, moderate low protection is provided below.

	Mod-low	**SMCA SMP**	**Shore fishing** (H&L, hoop net); **kelp bass, barred sand bass, lingcod, cabezon, and rockfish** (H&L, spearfishing); **sheephead** (H&L, spearfishing, trap); **spotted sand bass and halibut** (H&L); **lobster** (trap, hoop net, diving); **urchin** (diving); **rock crab and Kellet's whelk** (trap); **catch and release** (H&L-general) **In water depth <10m: Catch and release** (H&L-single barbless hooks and artificial lures) **In water depth <50m at islands and <30m on mainland: pelagic finfish, bonito and white seabass** (H&L);

Regarding the protection of juvenile white shark nursery grounds, a similar petition was submitted in 2020 (Petition 2020-012 AM1) to close off a smaller section of beach at Carpinteria for the same purpose. Like Petition 29, this earlier petition aimed to protect

juvenile white sharks within the currently proposed area. This 2020 petition was rejected by the Department and the Fish and Game Commission (FGC), which stated that MPAs are designed to protect nearshore ecosystems rather than individual species, especially highly migratory species like white sharks. Given that this issue was previously addressed at the same location just four years ago, the same arguments against the current petition apply today regarding white sharks.

Lastly, regarding the tribal access portions of the petition, while tribal access and co-management should be explored across the entire MPA network, current access to the area by tribes is not limited in any way. Regardless of a tribal MPA designation or not, federally recognized tribes will have access in the area just like the public. Closing this area off to all groups except those of the federally recognized Santa Ynez Band of Chumash Indians would have the additional side effect of restricting any non-federally recognized tribes, as the petition does mention. In addition to the above counter reasons of the petition's primary claims, there exists additional effects to be considered at the proposed MPA site. The proposed area was considered during the MLPA for the southern section but was traded off for two other SMCAs on the coast, Naples and Kashtayit that were present in different MPA alternatives that Carpinteria was not in. If allowed, the new MPA would essentially break the agreements struck during the MLPA. Lastly, the pre- and post-amended boundaries overlap existing oil infrastructure that is maintained year round, no existing exemptions or conversations have been had regarding this infrastructure overlap. For these reasons we believe the petition should be denied.

<u>Petition2023-32MPA – Reject</u>

Petition 32 requests expanding the Duxbury Reef SMCA north, south and converting the SMCA into an SMR. The petition cites apparent drops in biodiversity in the areas, confusion on take regulations, and, as a result, high incidence of accidental poaching.

We believe this petition to be well intentioned but do not believe it should be accepted. The petition's claims that there was a local drop in biodiversity are all based on local surveys on no actual data displaying a measurable drop in the biodiversity in the area.

Observations by MPA Watch on potential MPA violations comes from observers seeing "anyone with buckets," citing even children with buckets counting as a possible violation. While it is understandable to ascertain data this way, we would like the commission to understand that someone simply with a bucket on one of the most popular beaches in the area does not mean they are violating MPA take regulations. This method of data collection possibly is why the self-reported values of possible violations at Duxbury are so high, when actual enforcement reports show infractions at Duxbury being so low they do not even make it to the yearly MRC report. Enforcement reports on MPAs from the yearly March MRC give insight into MPA violations in the state, of which Duxbury Reef never was in the top MPAs in violation (top 35) or top 5 in the northern region specifically in 2024 or 2025. Letters from partner agencies such as state and national parks as well as national marine sanctuaries all cite possible issues with the SMCA, all requesting it expand, but no agency goes so far as to support making the area an SMR. No hard data whatsoever has been provided to demonstrate a need to expand the SMCA to include these highly inaccessible areas in the north or south as well. The petitioner's claim that visitors walking through the existing southern border with legal catch from outside the SMCA is merely speculative. Access to the reef in this southern section is blocked by an inside channel except during extreme low tides, making further regulatory protection unnecessary and a niche case at best.

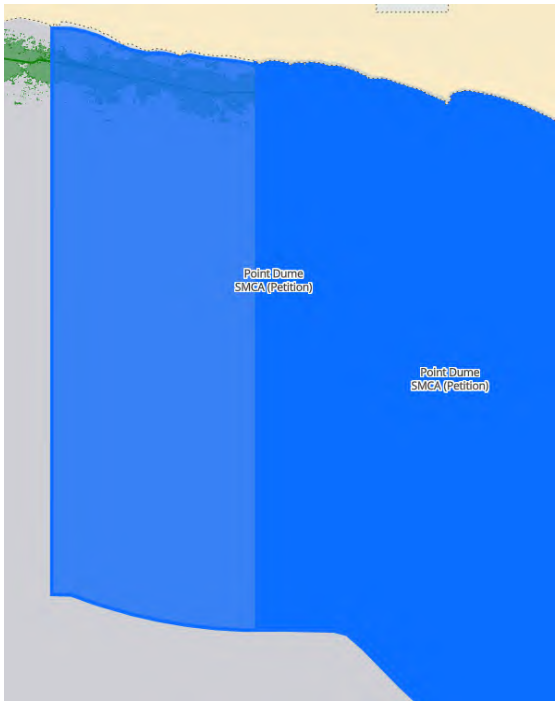
Regarding the original MPA expansion proposals, and even specifically the southern expansion (image above), the new covered area has a very asymmetric shape. This goes directly against MLPA guidelines for designating MPAs which state that MPAs with odd-asymmetric shapes are difficult to enforce and confusing to the public, possibly even adding to the confusions the petitioner claims is present at Duxbury. At the bare minimum, this border must be modified in a way that adheres to the MLPA MPA design guidelines before even being considered for final action. Because any possible additional area included or removed from the proposed expansion needs to be considered by all stakeholders, we must see what this final border actually is before providing further input. In December 2025, the petitioner did submit an informal request ("informal" was tagged by FGC staff) to change the border post-petition deadline, which could solve this odd shape issue. It is currently not known whether amendments like this can be considered. If the informal request is ultimately considered, the existing counter arguments still exist with exception of course of the expansion border shape.

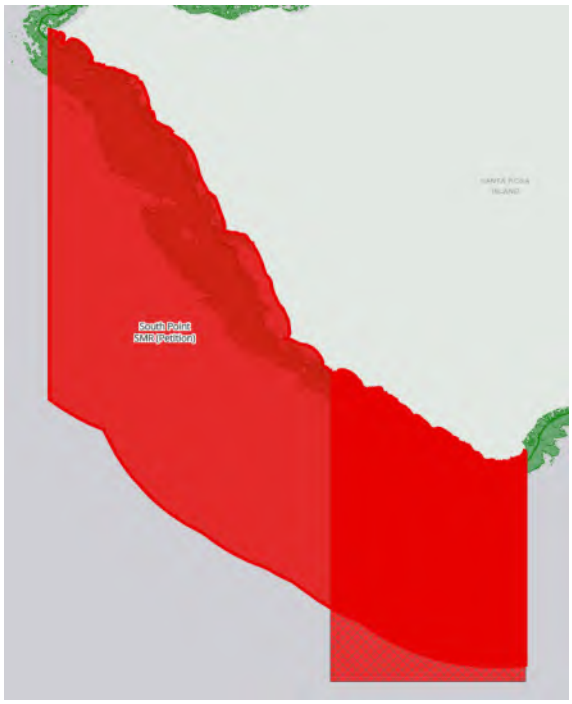
<u>Petition2023-33MPA – Reject</u>

Several groups and individuals have expressed opposition to this petition, and we all stand by the majority of their comments, even after the limited number of amendments to certain MPAs in petition 33. While there are various pathways for kelp restoration, the establishment of new or larger MPAs is not one of them. It is widely accepted that the growth and abundance of kelp are dependent on water quality and temperature. Even under ideal growing conditions, a large swell can damage kelp forests, ripping the

largest, most buoyant, stalks off the seafloor. Fishing activities have little to no impact on kelp health as seen by thriving kelp populations throughout history pre-dating even the MLPA when fishing access was less restrictive. It is well documented how we came to this spot in the first place for our kelp, the rolling El Ninos in the mid-2010s removed a substantial amount of our state's kelp forests, not fishing, and fishing restrictions are not what it will take for the forests to regrow. The creation or expansion of MPAs resulting from this petition will have a negligible effect on the recovery of kelp forests, but a permanent and lasting effect on those that have a livelihood on the water or those that want to simply fish and enjoy a day on the water. In some instances, such expansions may hinder restoration efforts by obstructing human interventions aimed at encouraging kelp growth, such as seeding areas or urchin barren removal efforts.

Furthermore, the petition does not adequately explain why most of the proposed expansion areas cover waters that are simply too deep for kelp to grow. All but one of its expansions (Gull Island) have this problem, covering waters well beyond kelps natural growing depth. Many of the proposed expansions extend to the state line, covering areas with depths exceeding 1,000 feet when kelp cannot grow any deeper than 150ft. For a petition focused on kelp restoration, this deepwater coverage is illogical and appears to be an attempt to limit area access to our already managed fisheries while protecting an area outside of the scope of the petition. Below are some of the petition's proposed expansions on SeaSketch with the kelp max extent per landsat and flyovers enabled (green layer under proposed expansions). This shows most of the expansion area does not even cover the absolute maximum kelp could grow. Any justifiable MPA expansions regarding kelp recovery at the bare minimum should be more targeted, covering specifically areas kelp can grow, not mass areas covering mostly water kelp cannot grow.





Lastly, the added amendments only pull back on one expansion, the Cabrillo SMR, and add in shore based take of finfish and general spearfishing of finfish at the proposed Pleasure Point SMCA and Point Dume SMCA. As mentioned previously, the shorebased allowance would reduce Pleasure Point and Point Dume to moderate-low levels of protection per the MLPA, losing their local MPA connectivity, making the proposed expansions weaken MPA connectivity rather than strengthen them. Specifically for Point Dume, that MPAs connectivity appears centrally important under the SeaSketch model and should be maintained. While the reduction in size at the Cabrillo expansion is a positive, we still believe any expansion in the first place is not warranted, especially for kelp restoration purposes.

<u>Petition2023-34MPA – Reject</u>

Petition 34 requests the redesignation of one offshore SMCA to a no-take SMR, merging it with the nearshore SMR at Point Buchon to make one no-take SMR. The petition also requests combining the nearshore and offshore SMCAs at Farnsworth into a single SMCA that would permit only pelagic finfish spearfishing, removing various pelagic fishing allowances existing there. The primary justification for these changes is enforcement concerns. Enforcement has effectively managed the existing MPA network without significant issues which already contains nearly 40% limited take SMCAs. The situations at Farnsworth and Point Buchon are similar to several other MPAs along the coast that successfully integrate nearshore and offshore components. The concept of allowing pelagic finfish targeting offshore—where interactions with the MPA's intended

protections are minimal—has been recognized since the first and second MPA Master Plans where it explicitly states the lesser effect pelagic fish have on themselves and the MPA ecosystem, and to allow for areas that have pelagic take respectively. Pelagic fishing should be permitted in MPAs that overlap with offshore waters, provided that fishing practices minimize interactions with local and nearshore species, which they inherently do. Additionally, if enforcement was truly the only concern, commercial harpoon at Farnsworth is just as enforceable, if not easier to enforce than recreational spear methods, and should be left in as an allowance in the SMCA. This petition also conflicts with Petition 20 and its requests at Point Bucheon.

The two MPA systems at Farnsworth and Point Bucheon are no different from other nearshore/offshore configurations, so-called “MPA clusters”, and we see no compelling reason to change them specifically. Both MPA clusters currently meet regional sizing guidelines for the total cluster area and LOP requirement to count them both for connectivity as is, with their current access. For these reasons, we believe this petition should be rejected.

Thank you,

AllWaters - AWPAC *(recreational)*
-Chris Killean (President)
-Matt Bond (Board Member)

Commercial Fishermen of Santa Barbara - CFSB *(commercial)*
-Chris Voss (President)
-Ava Schulenberg (Assistant Director)

Backcountry Hunters & Anglers - BHA *(recreational)*
-Devin O’Dea (Western Policy & Conservation Manager)

Coastal Conservation Association California - CCA Cal *(recreational)*
-Chris Arechaederra (Executive Director)
-Tonie Bagnos (Assistant Director)

Ventura County Commercial Fishermen's Association - VCCFA *(commercial)*
-Dave Colker (Executive Director)
-Jason Woods (President)
-Eric Hodge, Mike Kenny, Tim Athens (Board Members)

LA Rod and Reel Club *(recreational)*
-John Ballotti (President)

January 2026
Coalition Letter on Bin 2 MPA Petitions

Port San Luis Commercial Fishermen's Association *(commercial)*
-Chris Pavone (President)

Santa Barbara Sportfishing Club *(recreational)*
-Whitney Uyeda (President)

Alliance of Communities for Sustainable Fisheries *(recreational/commercial)*
-Alan Alward (Co-Chair)

San Diego Fishermen's Working Group *(commercial)*
-Pete Halmay (President)

Morro Bay Commercial Fishermen's Organization *(commercial)*
-Bill Blue (President)
-Tom Hafer (Secretary)

The Tuna Club Foundation *(recreational)*
-Chase Offield (Board Member)

Santa Barbara FreeDivers Club *(recreational)*
-Dave Huebner (President)
-Bradley Pirmen (Chair)

BD Outdoors *(recreational business)*
-Ali Hussainy (President)

The California Association of Harbor Masters and Port Captains *(commercial)*
-Tim Petrick (President)

Dana Wharf Sportfishing and Whale Watching *(recreational)*
-Donna Kalez (Co-Owner)

Santa Barbara Landing and Stardust Sportfishing *(recreational business)*
-Jamie Diamond (CEO/owner)

Monterey Bay Tritons *(recreational)*
-Brandon Burke (President)

NorCal Underwater Hunters *(recreational)*
-Matt Mattison (President)

January 2026
Coalition Letter on Bin 2 MPA Petitions

Fathomiers *(recreational)*
-Paul Romanowski (Conservation Officer)

The Catalina Seabass Fund *(recreational/commercial)*
-Jock Albright (Director)

The Laguna Maritime Alliance *(recreational/commercial)*
-Chase Offield (Chair)

Santa Cruz Kelp Stalker *(recreational)*
-Hans Haveman (Chair)

San Diego Freedivers *(recreational)*
-Ryan Moore (President)

OC Spearos *(recreational)*
-Hidenori Iwagami (president)

Long Beach Neptunes *(recreational)*
-Terry Maas (Chair)

Save Duxbury Access *(grassroots recreational/commercial)*
-Chris Martinelli (Local Lead)

American Fishing Tackle Company - AFTCO *(recreational/commercial business)*
-Bill Shedd (CEO)
-Casey Shedd (President)

Get Hooked Seafood *(commercial business)*
-Kim Selkoe and Victoria Voss (Co-Founders)

Pacific Coast Sportfishing *(recreational business)*
-Bill DePriest (Publisher / Editor)

January 2026
Coalition Letter on Bin 2 MPA Petitions

Dedicated Researchers/Scientists:

UCSB Bren School of Environmental Science & Management
-Dr. Dawn A. Murray (PhD. Ocean Sciences - UCSC)

UCSB & UCSC Conservation Scientist
-Dr. Jason Johns (PhD. Ecology and Evolutionary Biology - UCSB)

UCSB Marine Scientist
-Dr. Kim Selkoe (PhD. Ecology and Evolutionary Biology - UCSB)

Private Marine Scientist
-Ethan Estess (M.S. Earth Systems (Marine) - Stanford University)

Senior Marine Scientist and previous marine biologist for the Channel Islands NPS
-Derek Lerma (B.S. Biological Oceanography - Humboldt State University)

01/26/2026

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

Subject: Bin 2 MPA Petitions

Dear Melissa Miller-Henson,

Please add the San Diego County Wildlife Federation (SDCWF) to the CCA Coalition letter regarding Bin 2 MPA petitions being considered. We were unfortunately a bit late getting our logo and signature added to the letter represented below. The San Diego County Wildlife Federation represents over 20,000 sportsmen and women in San Diego County, and we are active in conserving our inland and aquatic habitats in a manner which allows both conservation protection with consumptive use of the waters of our state.

The SDCWF agrees with the recommendations of Coalition listed below.

Thank you for the work you and the Commissioners do for California outdoorsmen and women.

Respectfully,

Gary F. Brennan
President, San Diego County Wildlife Federation
P.O. Box 3886
Ramona, CA. 92065

Copy to: CCA California

Marine Conservation Institute

29 January 2026

Re: Comments from Marine Conservation Institute for consideration during the February 11-12, 2026 meeting on petitions to amend the state's MPA network.

(submitted via email to fgc@fgc.ca.gov)

Dear California Fish and Game Commission,

As California works to protect 30% of state waters by 2030 (30 x 30) to fight climate change, protect biodiversity, and expand access to nature for all Californians, the implementation of Marine Protected Areas (MPAs) that provide tangible benefits to marine biodiversity requires an understanding of effective conservation and knowledge of which MPAs meet that threshold.

Since 2012, Marine Conservation Institute's Marine Protection Atlas (MPAtlas) has brought a focused lens to the quality of marine protections in MPAs around the world. MPAtlas (mpatlas.org) is the largest global repository of MPA assessments using The MPA Guide[1]. The MPA Guide is a peer-reviewed scientific framework published in *Science* in 2021 that evaluates an MPA's stage of establishment and level of protection by looking at the management of mining, dredging & dumping, anchoring, infrastructure, aquaculture, fishing, and non-extractive recreational activities. Both management regulations and in situ activity data specific to each individual MPA are analyzed to determine the actual outcomes provided by a given MPA. Ecological evidence[2] from as recently as 2025 suggests that the best conservation outcomes are seen when MPAs are implemented or actively managed, and fully[3] or highly[4] protected from these seven activities.

Scientists from MPAtlas evaluated the 20 petitions proposing changes to California's MPA Network submitted to the California Fish and Game Commission by the public and Tribes in 2023 using The MPA Guide. Our preliminary analysis suggests that the following petitions would improve the level of protection for existing MPAs or designate new MPAs, expanding and strengthening the California State MPA Network's overall ability to achieve conservation benefits:

Petition	Marine Protected Area
2023-19MPA	Chitqawi SMCA
2023-20MPA	Point Buchon SMR
2023-23MPA-AM	Carmel Bay SMCA
	Pacific Grove Marine Gardens SMCA
	Tanker's Reef SMR
2023-24MPA-AM	Laguna Beach SMCA

14301 Arnold Drive Suite 25 Glen Ellen CA 95442
Marine-Conservation.org • +1 707 938-7036

2023-27MPA-AM	Anacapa Island SMCA
2023-28MPA-AM	Point Sal SMCA
2023-29MPA-AM	Mishopshno SMCA
2023-32MPA	Duxbury Reef SMR
2023-33MPA-AM	Cabrillo SMR
	Gull Island SMR
	Natural Bridges SMR
	Pleasure Point SMCA
	Point Conception SMR
	Point Dume SMCA
	South Point SMR
2023-34MPA	Farnsworth Offshore SMCA
	Farnsworth Onshore SMCA
	Point Buchon SMCA

With critical tipping points approaching ocean biodiversity, the opportunity to align California's MPA network with the best and most up-to-date understanding of MPA science is incumbent on the Commission. We urge the Commission to adopt the petitions that serve to advance conservation and keep the State of California moving forward with a world-leading example of marine conservation, creating an effective MPA network, and progressing towards the State's commitment to 30 x 30.

Sincerely,

Lance Morgan, PhD, President, Sonoma County
Nikki Harasta, Marine Conservation Scientist, Ventura County

1 Grorud-Colvert, K., et al. (2021). The MPA guide: A framework to achieve global goals for the ocean. Science. https://doi.org/10.1126/science.abf0861

2 Horta e Costa, B., et al. (2025). Marine protected areas' stage of establishment and level of protection are good predictors of their conservation outcomes. Cell Reports Sustainability. https://doi.org/10.1016/j.crsus.2025.100345

3 No impact from extractive or destructive activities is allowed and all abatable impacts are minimized. Non-extractive activities may include recreational, traditional, cultural, or spiritual activities. Examples include minimal impact snorkeling, swimming and SCUBA, tidepooling, cultural/ceremonial gatherings, education, knowledge transmission, and motorized or non-motorized vessels associated with the previously mentioned activities.

4 Only light extractive activities are allowed that have low impact, and all other abatable impacts are minimized. If any anchoring is allowed, it is small scale and for a short duration with a low impact. If any infrastructure is allowed, it is small scale with low impact. Any aquaculture must be low impact, small scale, low density, and unfed. If fishing occurs, it is infrequent and only five or fewer gear types are used that are highly selective and low-impact. Any non-extractive activities are regulated and restricted and of low impact, low density, and small scale.

From: Jennifer Sahn <[redacted]>
Sent: Sunday, February 1, 2026 9:59 AM
To: FGC <FGC@fgc.ca.gov>
Subject: Point Sal and Mishopshno State Marine Conservation Areas

February 1, 2026

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

Re: 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.

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. What would be even better would be co-management agreements with the tribes.

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. 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,

Jennifer Sahn

Santa Barbara, CA

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

February 6, 2026

Re: Retraction of signature and clarification of position on California MPA petitions

Dear President Zavaleta and Honorable Commissioners,

I am a marine scientist and environmental studies professor advising graduate students at Antioch University and teaching undergraduate courses in the Environmental Studies Department at UC Santa Barbara. I work in resource management and conservation realms to protect habitats and to amplify Indigenous voices in conservation initiatives. I also work locally with NOAA on intertidal marine sampling and support locally-rooted conservation efforts, including curriculum development and weaving Indigenous and Western Scientific Knowledge into system solutions. I have worked with the Northern Chumash Tribal Council (NCTC) supporting the Chumash Heritage National Marine Sanctuary (CHNMS) designation and Chumash cultural values, wisdom, and traditions in marine and land management practices. I currently serve on the NOAA CHNMS Advisory Committee as a Research Seat Alternate.

My research focuses on participatory conservation and co-designing conservation methods that equitably integrate local communities in multi-pronged conservation solutions. I value coalition-building, listening to and incorporating multiple perspectives in conservation planning. I work with fishermen around the world, including supporting the Miloli‘i Community-Based Subsistence Fishing Area (CBSFA), south of Kona, Hawai‘i, which includes the waters and submerged lands from the shoreline to the 100-fathom depth contour. The Miloli’i community leads the regulation creation and enforcement in their " last Hawaiian fishing village". In addition, I support the Commercial Fishermen of Santa Barbara in their continued efforts to practice local eco-friendly, sustainable fishing, sell locally caught fish in the Saturday market to our community, promote science and monitoring, and their stewardship of our coast via numerous annual beach and island clean-ups.

Over a year ago, I was asked to add my name to a joint letter about the MPA adaptive management proposals from commercial and recreational fishermen. I did so because of my relationships with many in the California fishing community. Recently, the letter was submitted to the Fish & Game Commission. Unfortunately, I had not kept up with the revisions, updates, or additions to the letter in the last 13 months and the in-depth amendments to each MPA petition. The letter contains recommendations that I am unable to endorse due to my expertise as a marine scientist. I need to retract my signature from that letter and clarify my position.

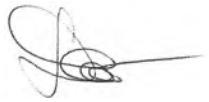
Clarifying my current perspectives on the MPA petitions:

- I submitted a letter in November 2023 endorsing Petition 2023-33MPA, and I am a supporter of protecting California's kelp forests because they provide invaluable ecological and environmental benefits. These dynamic and biodiverse ecosystems serve as critical nurseries for a wide variety of marine species, providing shelter and food for numerous fish, invertebrates, and marine mammals. Healthy kelp forests support thriving commercial and recreational fisheries and can help dampen the impacts of coastal erosion and storm impacts. With the declines in kelp forest cover across the Pacific West Coast, including California, from natural and human-induced factors, MPAs are a critical tool for supplying the population of recruits and supporting the resilience of kelp ecosystems in the face of these stressors.
- To achieve the stated goals of conserving biodiversity and ecosystem health, I encourage the state to consider increasing protections for MPAs that are currently only lightly or minimally protected as defined by The MPA Guide,[1] especially in places where weaker or more complicated regulations lead to poor compliance and enforcement. An example of what I support are the clarifications on Kashtayit regulation language and Campus Point SMCA color coding (Petition 2023-18MPA).
- I support strengthening the MPA network through the addition of new MPAs where they would protect critical habitat and advance Tribal co-stewardship. To that end, I endorse Petition 2023-28MPA designating Point Sal SMCA, which provides an opportunity to strengthen protections within the CHNMS and offers a pathway for meaningful co-stewardship between the state and NCTC. In addition, I support Petition 2023-29MPA designating Mishopshno SMCA, which would protect a special place culturally and ecologically, and similarly offer a pathway for meaningful co-stewardship between the state, Santa Ynez Band of Chumash Indians, and potentially other Tribes. I appreciate that the petitioners were responsive to feedback from the local community, including recreational and commercial fishers, cutting the size of the proposal in half.
- Finally, I do not support weakening MPA protections off the California coast in any capacity. For example, to open recreational fishing opportunities to non-Base fishers, Petition 2023-18MPA would create a narrow alongshore State Marine Conservation Area within the existing SMR that would allow all people to fish for finfish by hook and line. This change would weaken the MPA network by officially downgrading the protections within the state's largest fully protected MPA. Instead, I support the state ensuring current Vandenberg SMR restrictions are enforced and applied to Base personnel and dependents, so that it is not only non-military community members who must comply.

California's MPA network is imperative for maintaining healthy ocean habitats, biodiversity along the California coast, and ecosystem resilience. Management of MPAs can also honor numerous knowledge systems - commercial fishers, recreational fishers, Indigenous peoples, local communities, and Western scientific knowledge systems. The adaptive management process offers a pathway to improve, and build on the successes of our globally-recognized MPA network.

[1] Grorud-Colvert, Kirsten, Jenna Sullivan-Stack, Callum Roberts, et al. 2021. "The MPA Guide: A Framework to Achieve Global Goals for the Ocean." Science, ahead of print, September 10. World. https://doi.org/10.1126/science.abf0861.

Thank you for the opportunity to clarify my position. I appreciate your leadership and your commitment to a healthy and vibrant ocean for all.



Dr. Dawn A. Murray
Professor Environmental Studies, Antioch University
Lecturer Environmental Studies Department, UC Santa Barbara

Received at the California Fish and Game Commission
February 19, 2026

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 with 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

Received at California Fish and Game Commission
February 20, 2026

The Land Trust for Santa Barbara County

OUR MISSION

THE LAND TRUST FOR SANTA BARBARA COUNTY CONSERVES NATURAL RESOURCES, AGRICULTURAL LAND AND OPEN SPACES FOR THE BENEFIT OF PRESENT AND FUTURE GENERATIONS.

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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

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

Outlook

CFSB comment letters on two petitions

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

--
Kim Selkoe, Ph.D.
~~~~~~~~~~~~~~~~~
Executive Director
Commercial Fishermen of Santa Barbara
6 Harbor Way #155
Santa Barbara, CA 93109
[redacted]

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fcfsb.info%2F&data=05%7C02%7Cfgc%40fgc.ca.gov%7Cd9e1be4fa6834c53364608de73e3b962%7C4b633c25efbf40069f1507442ba7aa0b%7C0%7C1%7C639075619489335515%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=SvipO%2F0Lzmsw6f1SiQUkP7XtjwQDfK4XpczKreGxEIw%3D&reserved=0
~~~~~~~~~~~~~~~~~

COMMERCIAL FISHERMEN OF SANTA BARBARA

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).

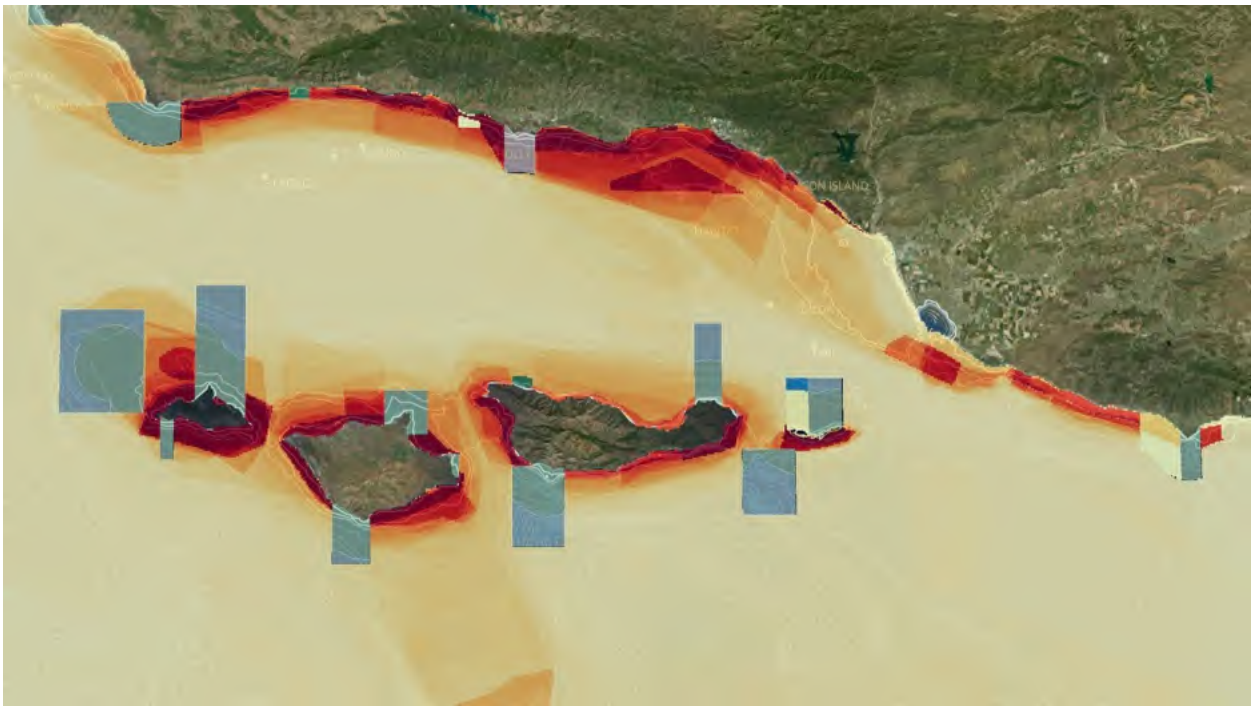


Fig. 2 Composite Seasketch heatmap showing the value of fishing grounds in the Santa Barbara Channel, for all 53 survey responses representing all species and gear types. Note that biases are possible, especially at the coastal margins, where fishers from other ports may more highly value grounds than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

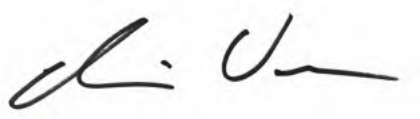
This Area Was Already Considered and Traded Off During the MLPA Process

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.

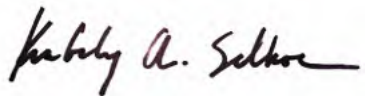
For these reasons, CFSB urges the Commission to reject Petition 2023-29MPA-AM1.

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

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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.

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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

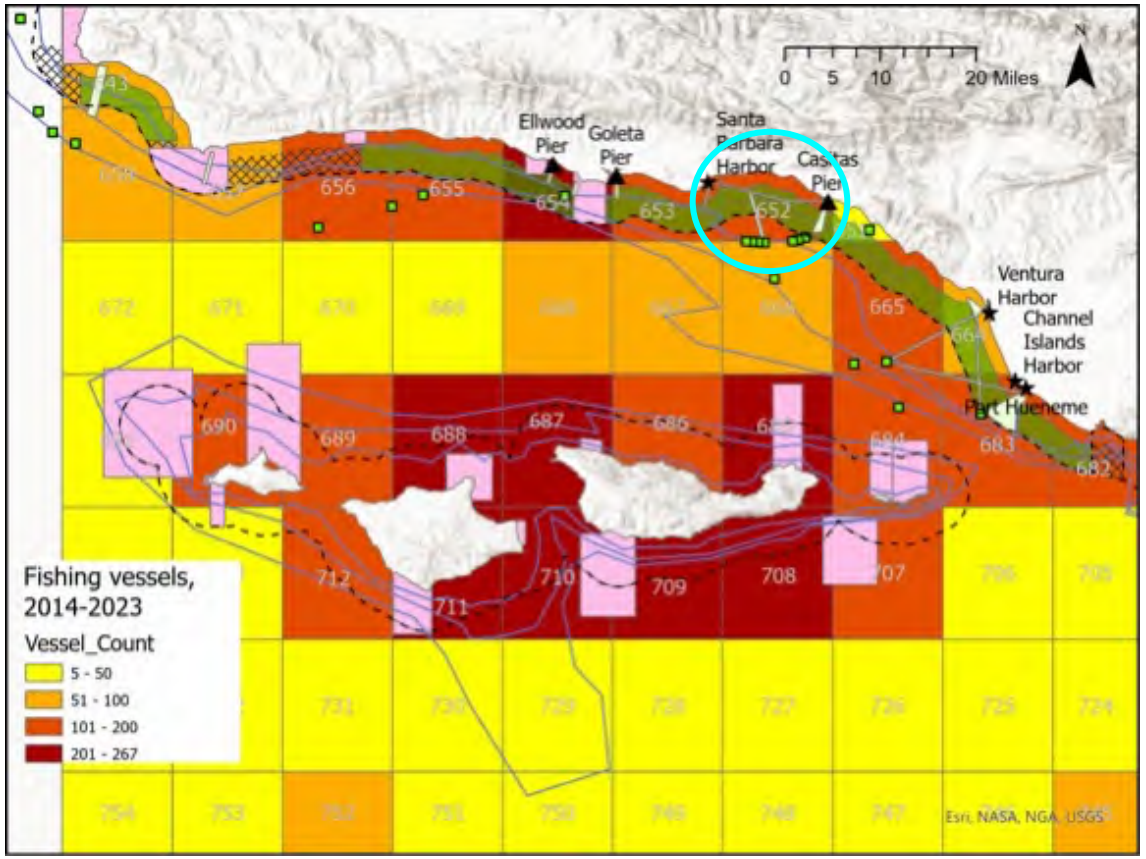
APPENDICES

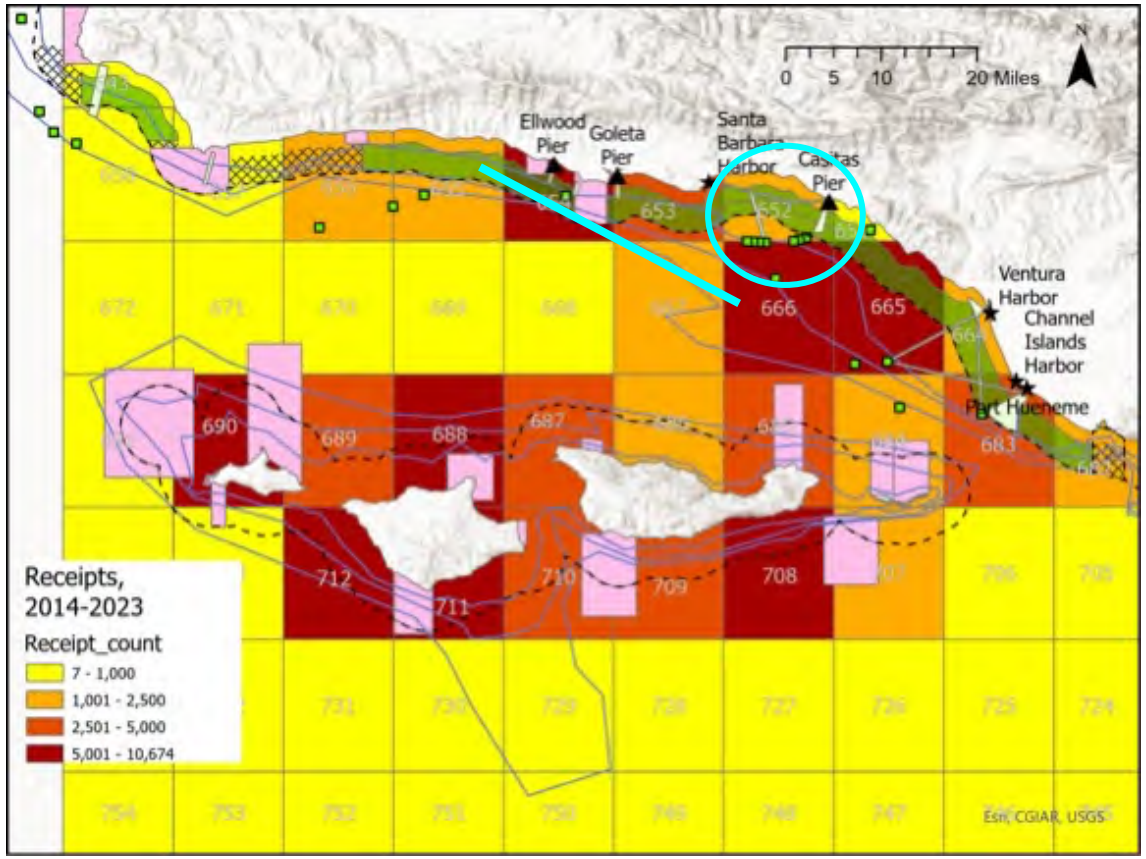
1. CDFW DATA
2. SEASKETCH METHODS

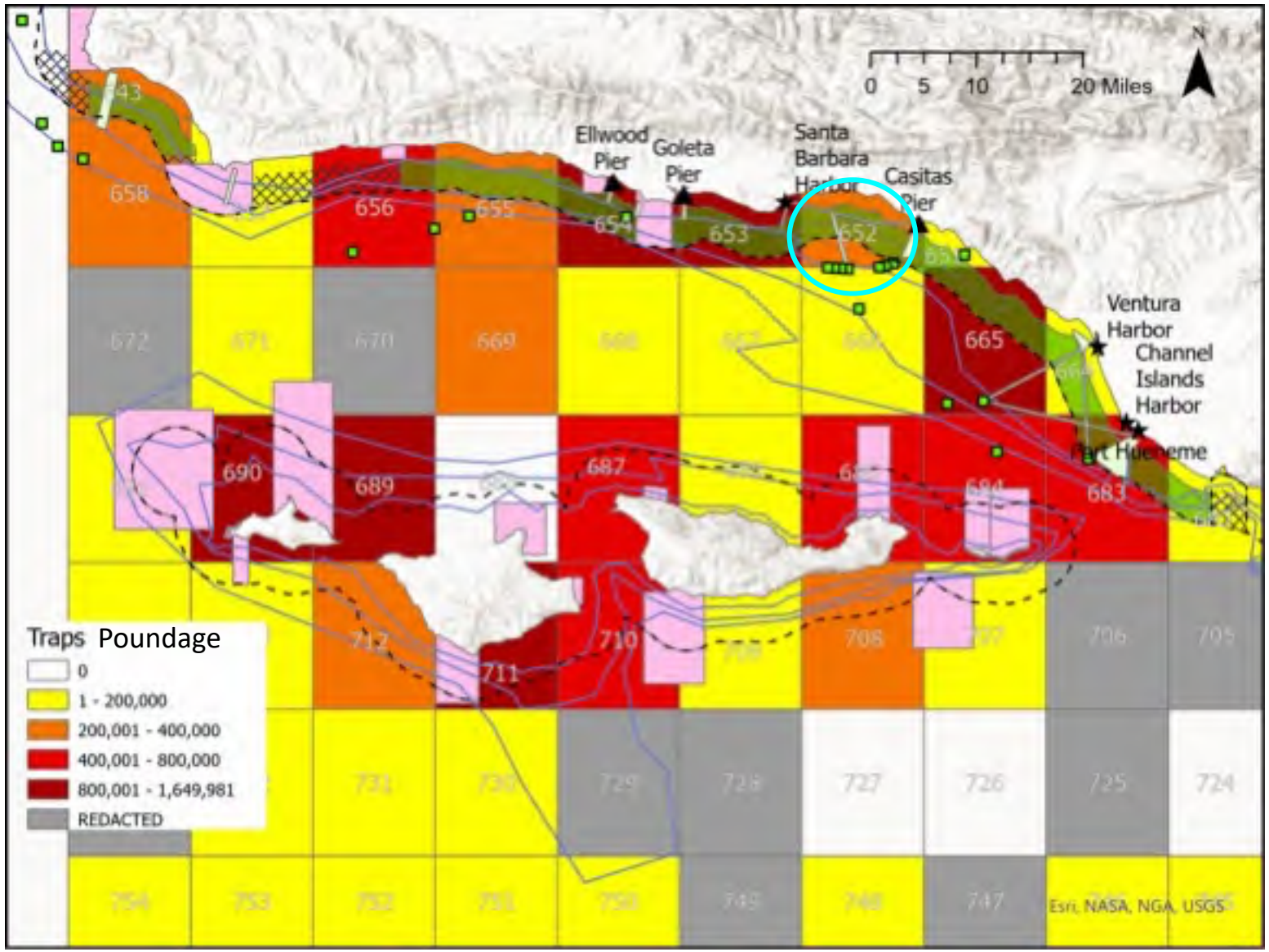
Data Compiled from CDFW records
by Mary Nishimoto, Ph.D.
shared with CFSB May 21, 2024

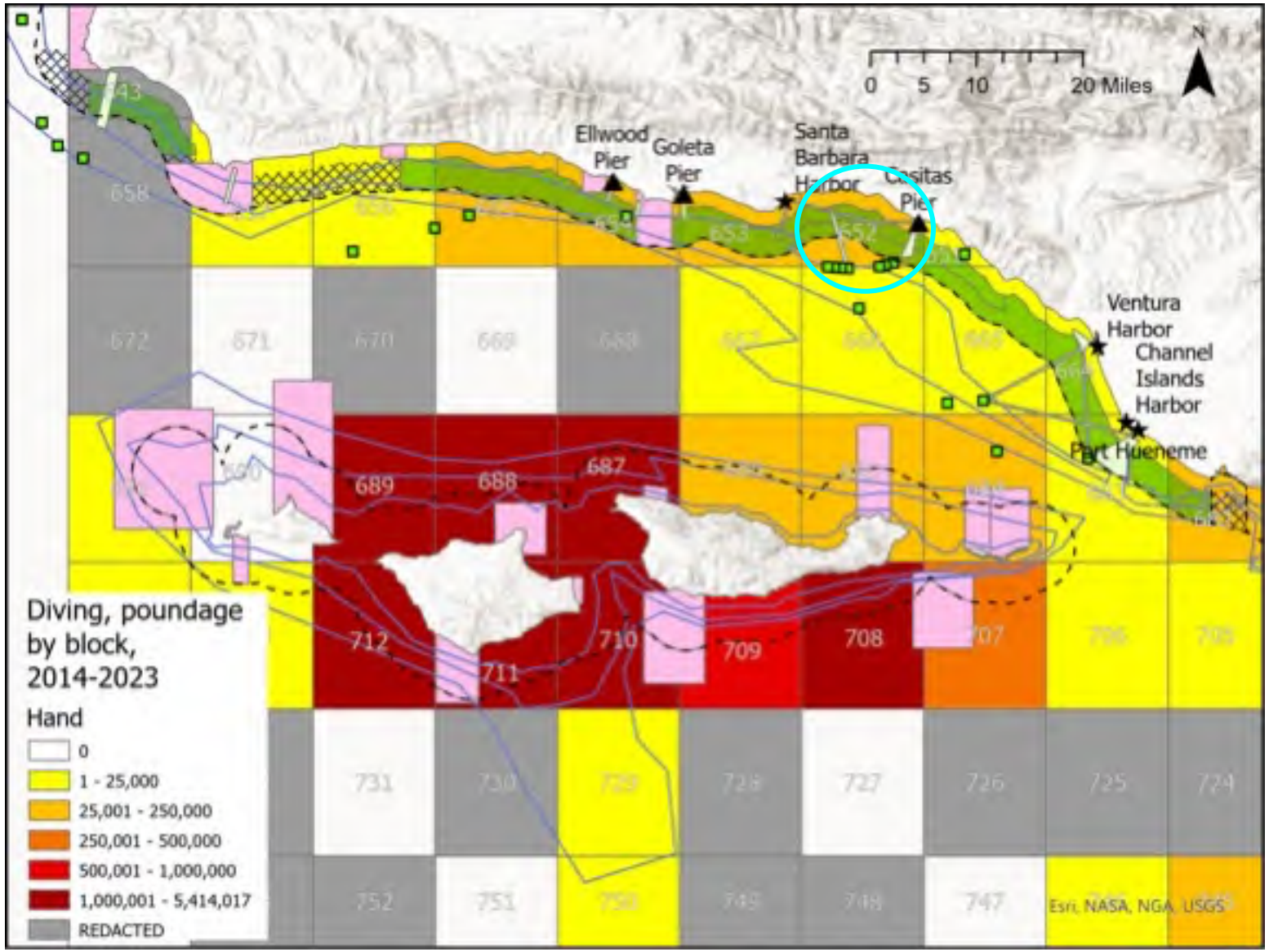
Blue circles added to highlight Block 652

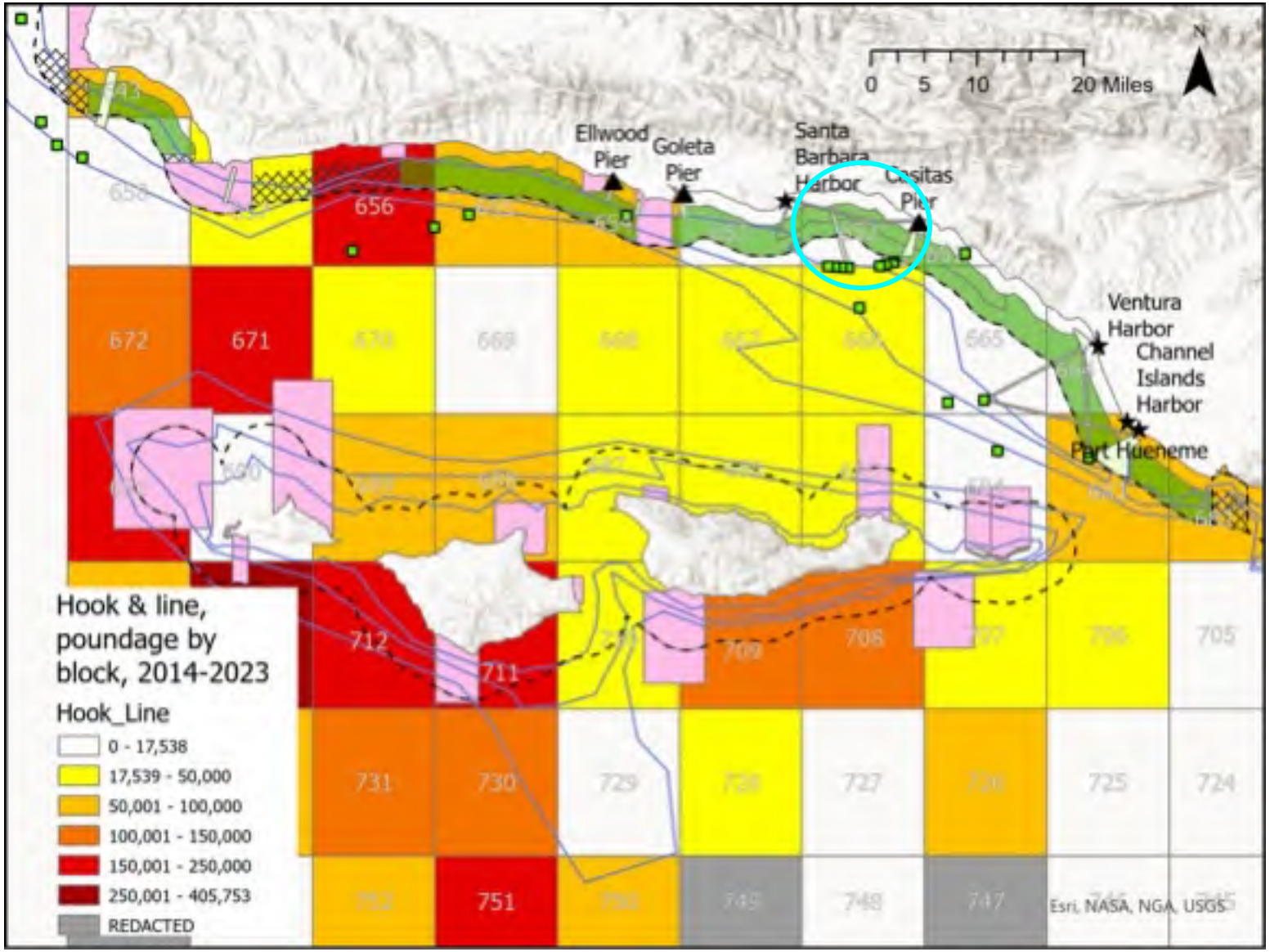
296 vessels landed catch in Santa Barbara port area in 2023

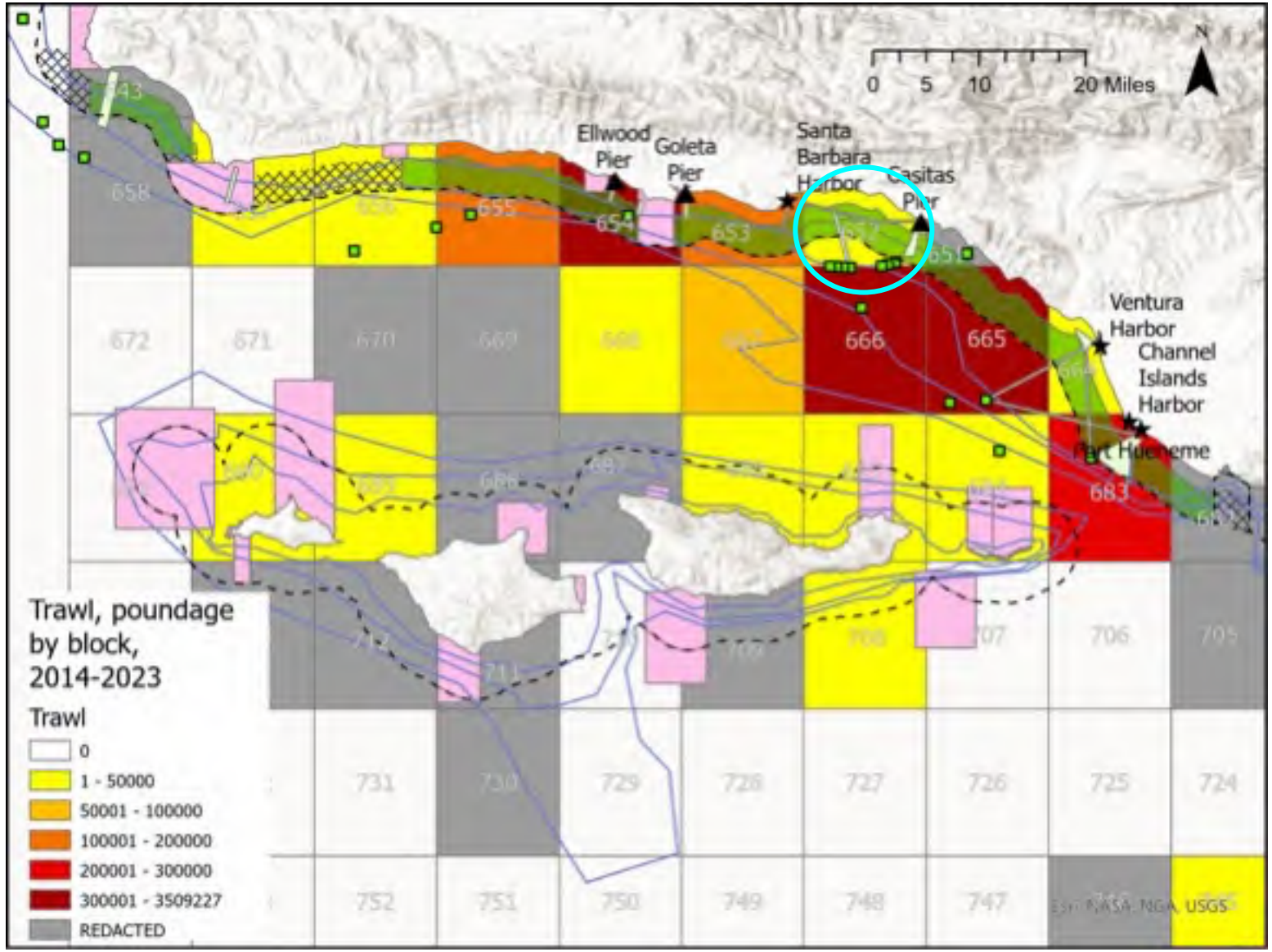


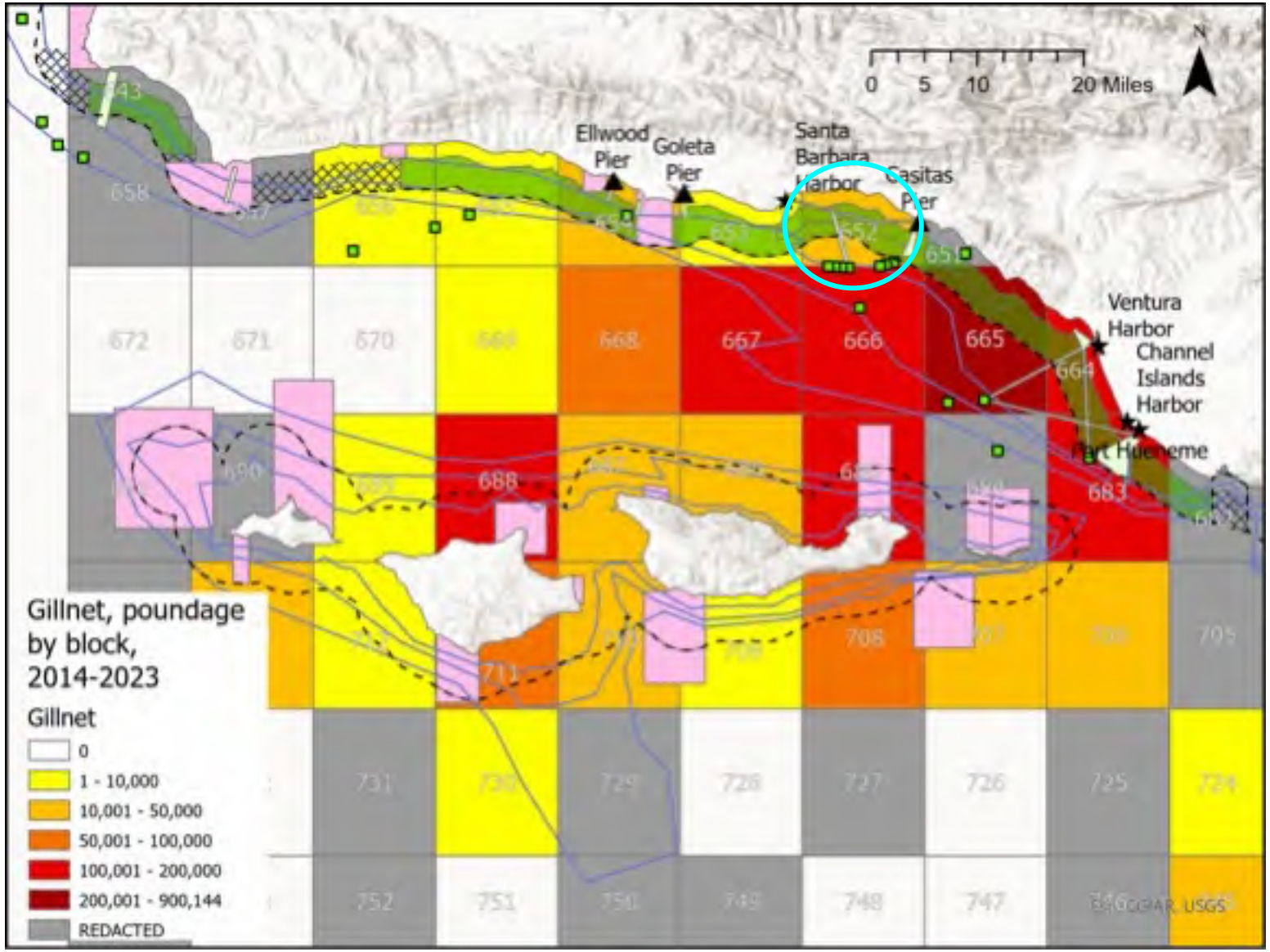



0 5 10 20 Miles
N
Ellwood Pier
Goleta Pier
Santa Barbara Harbor
Casitas Pier
Ventura Harbor
Channel Islands Harbor
Port Hueneme
658
656
655
654
653
652
665
690
689
687
684
683
717
711
710
708
706
705
731
729
727
726
725
724
754
753
752
751
750
749
748
747
Traps Poundage
0
1 - 200,000
200,001 - 400,000
400,001 - 800,000
800,001 - 1,649,981
REDACTED
Esri, NASA, NGA, USGS


0 5 10 20 Miles
N
Ellwood Pier
Goleta Pier
Santa Barbara Harbor
Casitas Pier
Ventura Harbor
Channel Islands Harbor
Port Hueneme
Diving, poundage by block, 2014-2023
Hand
0
1 - 25,000
25,001 - 250,000
250,001 - 500,000
500,001 - 1,000,000
1,000,001 - 5,414,017
REDACTED
Esri, NASA, NGA, USGS


0 5 10 20 Miles
N
Ellwood Pier
Goleta Pier
Santa Barbara Harbor
Casitas Pier
Ventura Harbor
Channel Islands Harbor
Port Hueneme
Hook & line, poundage by block, 2014-2023
Hook_Line
0 - 17,538
17,539 - 50,000
50,001 - 100,000
100,001 - 150,000
150,001 - 250,000
250,001 - 405,753
REDACTED
656
672
671
712
711
709
708
731
730
751
Esri, NASA, NGA, USGS


0 5 10 20 Miles
N
Ellwood Pier
Goleta Pier
Santa Barbara Harbor
Casitas Pier
Ventura Harbor
Channel Islands Harbor
Port Hueneme
Trawl, poundage by block, 2014-2023
Trawl
0
1 - 50000
50001 - 100000
100001 - 200000
200001 - 300000
300001 - 3509227
REDACTED


0 5 10 20 Miles
N
Ellwood Pier
Goleta Pier
Santa Barbara Harbor
Casitas Pier
Ventura Harbor
Channel Islands Harbor
Port Hueneme
Gillnet, poundage by block, 2014-2023
Gillnet
0
1 - 10,000
10,001 - 50,000
50,001 - 100,000
100,001 - 200,000
200,001 - 900,144
REDACTED
CCAR, USGS

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.

Port: **Species**	**Pounds**	**Value**	**% Total Pounds**	**% Total Value**
Santa Barbara Harbor:				
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%
Total	*2,021,257*	*$12,510,716*		

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[1]. 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) [2], 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.

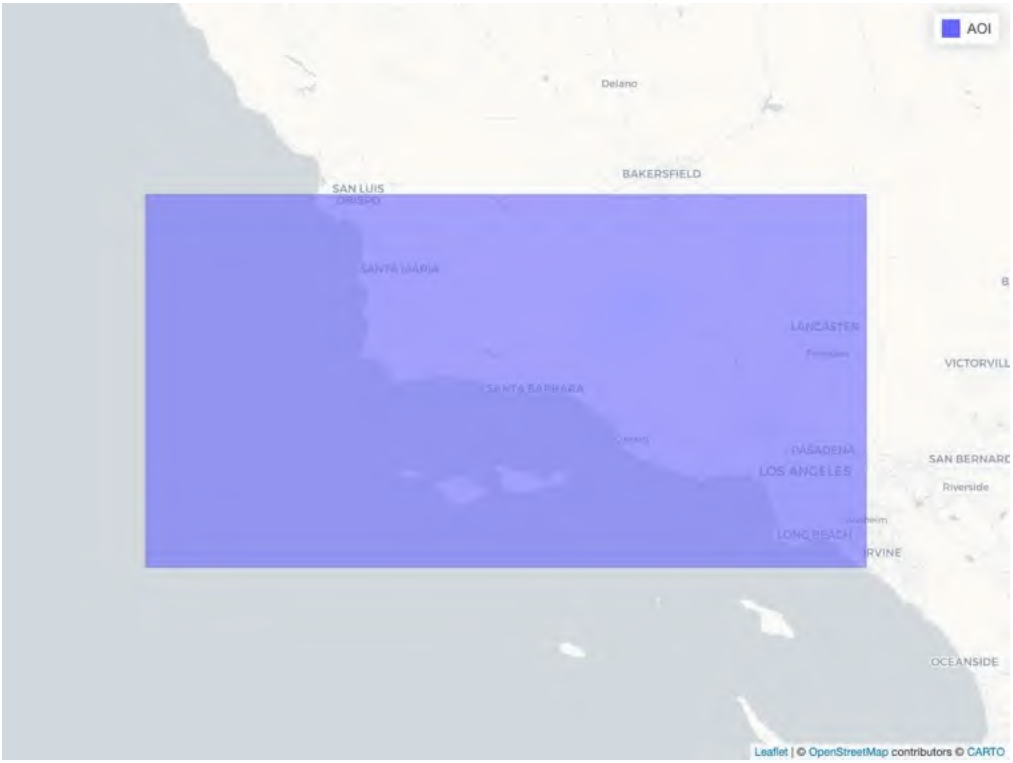


Figure 1: Map indicating AOI for this project. To ensure focus on the SB channel was maintained, all shapes were cropped to this AOI before creating rasters. The original data remains intact, under ownership of CFSB, in case there is a need to create future maps with a wider scope.

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.

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	*Angel Shark* *Albacore* *Black cod* *Bonito* *Box Crab* *Dorado* *Halibut* *Kelp* *Kellet's Whelk* *Ling cod* *Lobster* *Louvar* *Mackerel/ sardines / anchovies* *Ocean Whitefish* *Octopus* *Opah* *Pelagic Shark* *Ridgeback shrimp* *Rock Crab* *Rockfish* *Salmon* *Sand Dab* *Sea Cucumber* *Sheephead* *Slime Eels* *Sole* *Spider Crab* *Spot Prawn* *Squid* *Swordfish* *Thornyhead* *Thresher shark* *Tuna* *Urchin* *White Seabass* *Yellowtail* *Other*	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

COMMERCIAL FISHERMEN OF SANTA BARBARA

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

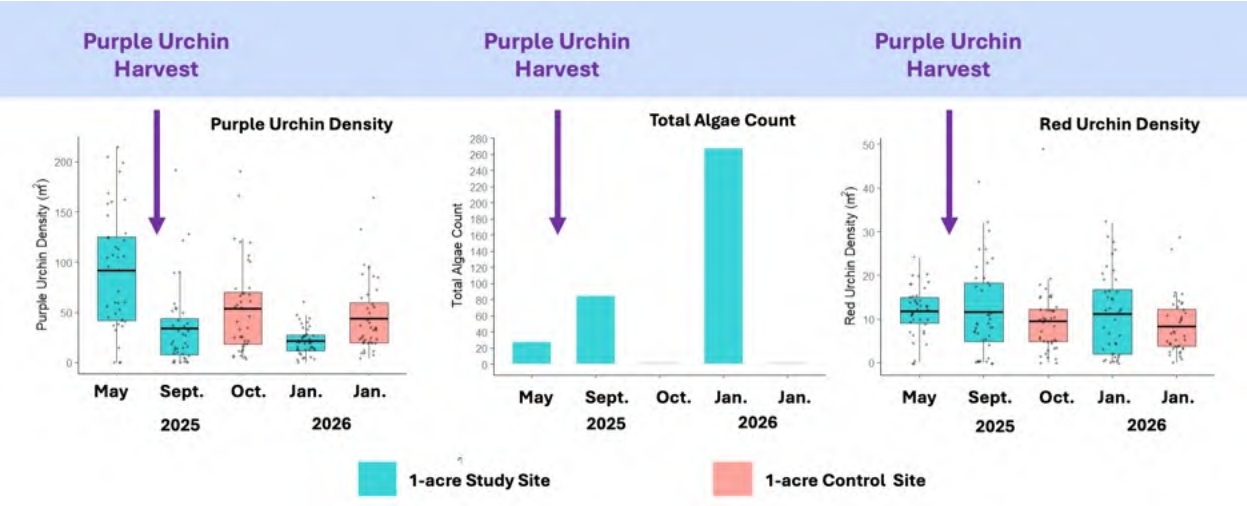


Figure 1. Results of CFSB's purple urchin removal pilot project at Tyler Bight in San Miguel Island that harvested 3,000 lbs of purple urchin in 1 acre. Data collected, analyzed and displayed by the Caselle Lab at UCSB.

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 unsupportable. 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.

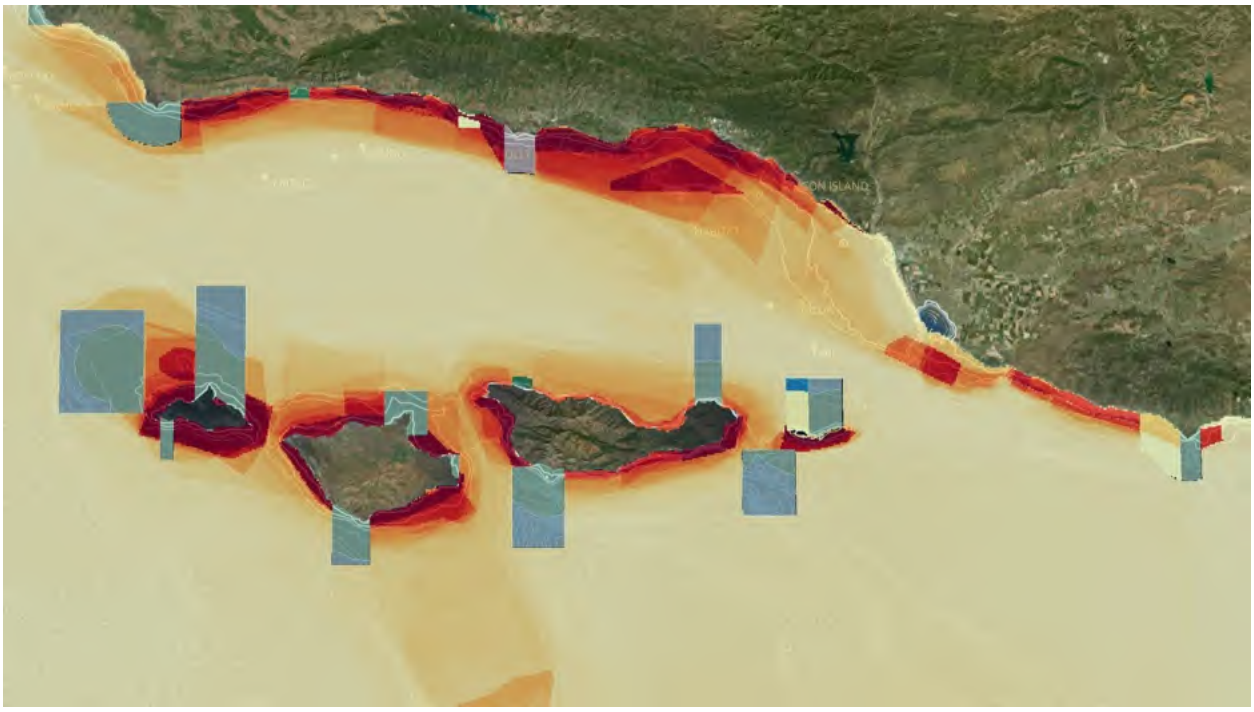


Figure 2. Composite Seasketch heatmap showing the value of fishing grounds in the Santa Barbara Channel to 53 fishers based in SB and Ventura. Note that biases are possible, especially at the coastal margins, where fishers from other ports may more highly value grounds than the respondents. See appendix 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[1]. 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) [2], 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.

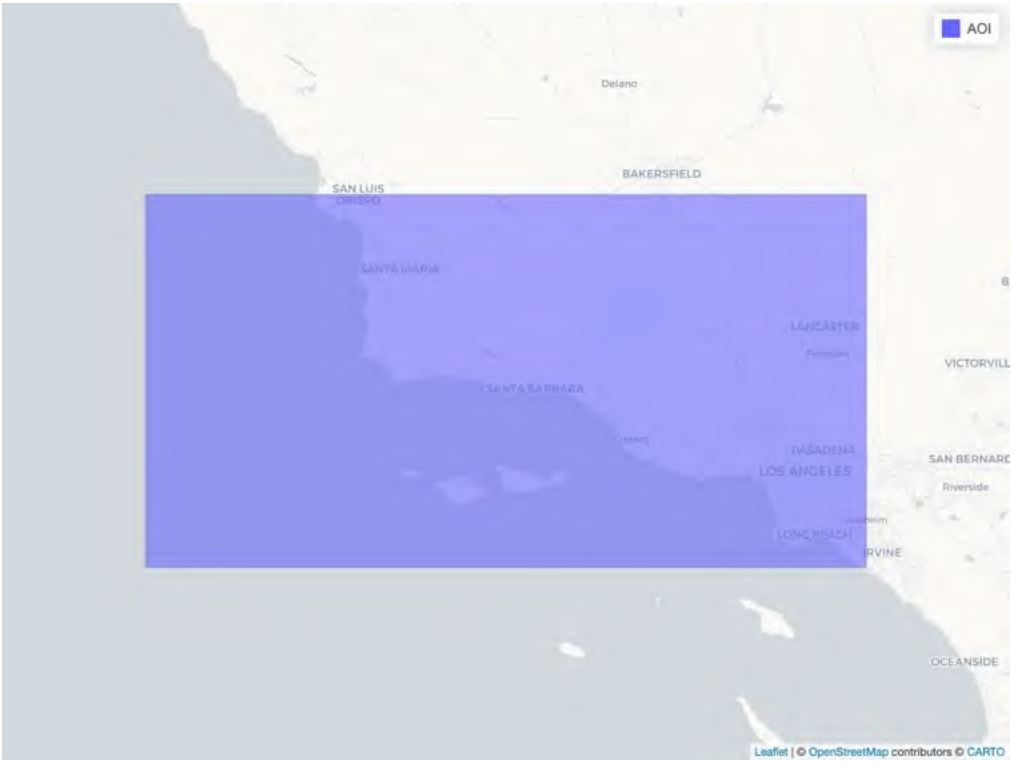


Figure 1: Map indicating AOI for this project. To ensure focus on the SB channel was maintained, all shapes were cropped to this AOI before creating rasters. The original data remains intact, under ownership of CFSB, in case there is a need to create future maps with a wider scope.

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	*Angel Shark* *Albacore* *Black cod* *Bonito* *Box Crab* *Dorado* *Halibut* *Kelp* *Kellet's Whelk* *Ling cod* *Lobster* *Louvar* *Mackerel/ sardines / anchovies* *Ocean Whitefish* *Octopus* *Opah* *Pelagic Shark* *Ridgeback shrimp* *Rock Crab* *Rockfish* *Salmon* *Sand Dab* *Sea Cucumber* *Sheephead* *Slime Eels* *Sole* *Spider Crab* *Spot Prawn* *Squid* *Swordfish* *Thornyhead* *Thresher shark* *Tuna* *Urchin* *White Seabass* *Yellowtail* *Other*	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

Outlook

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

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

Outlook

Agenda item 2 FGC April 15, MPA Bin 2 Petitions

From Jaime Diamond <info@stardustsportfishing.com>
Date Mon 03/30/2026 08:18 PM
To FGC <FGC@fgc.ca.gov>

Clarifying my attached letter is for agenda item 2 4/15/26

On Mon, Mar 30, 2026 at 8:14 PM Jaime Diamond <info@stardustsportfishing.com> wrote:

> Please confirm receipt of my attached comments.
>
> --
> Jaime Diamond

--
Jaime Diamond
Stardust/Coral Sea
Owner
805-259-6775
www.StardustSportfishing.com

March 28, 2026

To: California Fish and Game Commission

From: Stardust Sportfishing and Santa Barbara Landing

Subject: Bin 2 Petition Analysis

Dear Chair Sklar and Commissioners,

Stardust Sportfishing and Santa Barbara Landing offers sportfishing trips, whale watching, guided Channel Islands kayaking and SCUBA adventures, SCUBA instruction, kayak & jet ski rentals, fishing clinics, and a bait and tackle store located in the Santa Barbara Harbor. We are the main provider of ocean access (both consumptive and non-consumptive) to the public from Santa Barbara. Stardust Sportfishing is owned by husband and wife team Captain Jason and Jaime Diamond. We are board members of The Sportfishing Association of California, and Jaime serves as Regional Vice President of SAC.

The MPA network was developed after an extensive and traumatic process, Captain Jason was part of the regional stakeholder group for the Santa Barbara area. Recreational anglers and charter operators had to adapt to the loss of access to approximately fifty percent of our traditional fishing areas. Unfortunately, some were not able to and went out of business.

Today, we have adapted to the framework, trust has been built as recreational anglers and vessels from the CPFV sector including our vessels Stardust & Coral Sea, have been involved in the study of the MPA network. We believed what we were told, it would never happen again, that was it. Unfortunately, now, we find ourselves far down the path of MPA 2.0, despite a list of 27 adaptive management recommendations from the MPA Decadal Management Review, which would or could have offered meaningful change to improve and strengthen the network vs blanket expansions. The sportfishing industry did not submit petitions to remove any MPA's, because we respect the work that has been done, and the protections as they are.

We applaud the CDFW analyses of the non-tribal bin 2 2023 MPA petitions submitted in response to the Decadal Management Review recognizing the adaptive management component of the Marine Life Protection Act.

In 2023 the "draft evaluation framework (Draft Framework) was developed for the 15 Bin 2 Petitions that propose changes to the Marine Protected Area (MPA) Network that were received by the California Fish and Game Commission (CFGC) and referred to the California Department of Fish and Wildlife (CDFW) in 2023. CDFW developed the Draft Framework, with support from staff at the CFGC and Ocean Protection Council (OPC), based on the adaptive management process outlined in chapter 4 of the 2016 Master Plan for MPAs. The 2016 Master Plan directs CDFW and CFGC to use the Marine Life Protection Act (MLPA) goals and mandates, MPA objectives, and design considerations as the primary basis for any action taken to make

changes to the MPA Network. The Draft Framework also draws from the Decadal Management Review (DMR) and recommendations, and the MPA Regulation Change Petition Framework approved by CFGC at their August 2023 meeting, which is rooted in the DMR recommendation cornerstones of MPA Governance, MPA Management Program Activities, and MPA Network Performance." (Evaluation Framework for 2023 Marine Protected Area Bin 2 Petitions at https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=232901&inline).

We support the Department's work product and recommendations and believe the Department has exhaustively researched and cited the components of the MLPAI process which illuminate the choices and considerations to guide their analyses and recommendations.

We offer our recommendations to the Commission for1 tribal petition and 5 non-tribal petitions that would have a detrimental impact on our own business and the broader sportfishing community a. We review the implications of the proposed actions with the greatest potential impact on our ability to provide public access to the state's rich and sustainably managed marine resources, our continued economic vitality, and the overall continued sustainable management of our fisheries.

Petition 2023-29MPA, and absent CDFW recommendations,

DENY based on the following:

Petitioners propose the establishment of a new State Marine Conservation Area off the coast of Carpinteria. This proposal is redundant, scientifically unsupported, reduces public access to all but the documented members of the Federally recognized Santa Ynez Band of Chumash. It creates an undue burden on a region already heavily impacted MPA fisheries closures.

Tribal Stewardship and Co-Management

We continue to support California's commitment to tribal sovereignty and co-management of native resources. However, we emphasize that tribal stewardship does not require the creation of new MPAs.

Tribal stewardship is currently a component of the MPA framework under the MLPA Master Plan. There are four MPA's allowing the Santa Ynez Band of Chumash exclusive fishing access at Anacapa SMCA, Naples Reef SMCA, Point Dume SMCA, and Kashtayit SMCA. Tribal exemptions allow traditional and ceremonial take. These examples demonstrate that the state can honor its commitment to tribal sovereignty and Traditional Ecological Knowledge (TEK) by modifying current regulations without closing additional area to public access for fishing. This was most recently done at the August 22, 2018, FGC meeting.

The Santa Ynez Band of Chumash previously submitted a petition for Tribal Take within several existing MPA's. In 2018, after a full analysis, the FGC approved their petition. (FGC Decision Document 08-22-2018) The new petition 2023-29MPA is exclusionary in nature. The area they propose is currently open and accessible to the public and all tribal members regardless of federal recognition. If implemented this new closure would exclude access for all others, including descendants of local Chumash who also have ancestral ties to these waters but are not registered members of the Santa Ynez Band. True collaborative co-management should be explored across California's entire MPA network to ensure equitable access for all tribal

members. We encourage you to prioritize collaborative management at these existing sites. Additional closures which eliminate access for non-federally recognized tribes and the public are not needed, nor appropriate.

Scientific Rationale for Denial

The scientific justifications provided in the petition are fundamentally flawed:
Connectivity: The petition argues for a new MPA to fill a gap in the network. However, official measurements show the spacing between existing MPAs at Campus Point and Point Dume is 60.60 miles, which falls within the state's recommended 31–62 mile spacing guideline, making a new designation unnecessary.

Species-Specific Protection: The petition focuses heavily on protecting juvenile white shark nurseries. The Fish and Game Commission established clear precedent in 2020 when it denied a nearly identical petition for this exact location, stating that MPAs are intended to protect entire ecosystems, not individual highly mobile species like sharks.

The petitioner proposes allowing shore-based finfish take, which reduces the area's Level of Protection to moderate-low. Under the MLPAI SAT guidance this LOP would not support MPA connectivity goal.

Disproportionate Regional Impact

The Santa Barbara Channel is already one of the most protected regions in California with 19 MPA's. Currently, 21% of Channel Islands National Marine Sanctuary waters in this area are protected, significantly exceeding the state average of 16%. Furthermore, 96.41% of the Channel Islands MPA network is designated as no-take, compared to a 60% average for the rest of the state. Closing Carpinteria would further marginalize local recreational fishermen who have already seen their traditional grounds significantly reduced.

Carpinteria Reef, the reef that would be almost entirely inside the proposed MPA, is one of relatively few reef areas close to harbor for fishing. Approving this petition will be the end of local fishing access to coastal reefs. It will totally exclude opportunity for those who cannot afford or safely travel across to the Channel Islands such as skiffs, kayak fishermen and freedivers. The reefs in the protected waters of the proposed MPA are where charter boats take first timers, trips with special needs children, and our wounded warriors due to close proximity to the harbor, generally protected area from weather, and the variety of fish habitat in this zone. There is also an overwhelming amount of public outcry on this petition due to a lack of meaningful local outreach. The Carpinteria reef area is vital to the local community, economy, local charter businesses, and tourism. Closing this area to fishing would ignore carefully negotiated outcome for this region during the MLPAI process. It would greatly reduce access for all non-Santa Ynez Band Chumash tribal people as well as create regulatory conflicts in the planned decommissioning of oil infrastructure in the area. We respectfully urge you to deny Petition 2023-29MPA---

Petition2023-27MPA-AM1 – new restrictions on anchoring within the existing Anacapa Island SMR/SMCA complex.

Deny (in concurrence with the CDFW recommendation and rationale)

There is little evidence that the current allowance of anchoring in these waters is having an enduring negative impact on seagrass beds in this area. Seagrass in the area is predominantly Zostera Marina, a resilient flowering plant that propagates predominantly through sub-benthic rhizomes lying buried beneath the seafloor in soft bottom substrates.

Its appearance and density above the bottom vary seasonally and season to season. Primary influences on its abundance are lighting (water clarity and depth), appropriate substrate, surge and current strength. The impact of anchoring, should it happen to be within an area colonized by Zostera, is minimal and temporary. Current levels of anchoring in the area are relatively low and sea grass beds disturbed quickly recover.

Members or our fleet do fish within this SMCA and appreciate the access to coastal pelagic species there. Anchoring is part of that activity, and this proposal leaves open the potential for an anchoring prohibition that would adversely impact that fishing opportunity for the public.

Petition 2023-33MPA –

This petition proposes the following MPA expansions and new MPAs

- **i. Cabrillo SMR - expand westward and northward by 15.2 sq mi ~9.9 sq mi**
- **ii. Point Dume SMCA - expand westward by 4.6 sq mi**
- **iii. South Point SMR - expand westward by 26.3 sq mi**
- **iv. Gull Island SMR - expand northward by 1.8 sq mi**
- **v. Point Conception SMR - expand eastward by 14.6 sq mi**
- **vi. Natural Bridges SMR - expand southward by 13.7 sq mi, eastward to the edge of Natural Bridges State Beach by ~14.5 sq mi**
- **vii. Pleasure Point, Santa Cruz - designate 3.2 sq mi as a new State Marine Reserve Conservation Area**

Deny (in concurrence with the CDFW recommendation and rationale)

This petition is a bold “land grab” which proposes to turn vast areas of prime, valued rocky reef habitat, especially in waters of less than 100 meters, into marine parks that ban fishing. This habitat type is already over-represented within our MPA network as compared to its natural occurrence in state waters. These proposed actions are completely out of line with the guidance provided for adaptive management measures to be considered by the Commission, which offered that this would not be MLPA-2.

To date our award winning MPA network has shown that a larger biomass-per-area of the species that fisheries target has developed within our MPAs. This state-wide result is driven by differences observed in the southern regions.

What has not been observed within the scientific monitoring effort was a difference in fish diversity, or ecosystem resistance to change (due to the recent marine heat wave). While these kinds of benefits have been observed globally that they were not here indicate two things.

The first is if there are differences in ecosystem resilience or species diversity between waters inside and outside of MPAs in California, the scale of the difference is likely to be small.

The second is quite revealing and illuminates that the existing robust fisheries management and environmental protections are already protecting biodiversity and ecosystem resilience at a very high level statewide. What's missing is only robust protection from future industrialization. However, this is something that is provided for within the National Marine Sanctuary waters.

The petitioners proposed actions would exclude fishing from vast areas of rocky bottom habitat in waters less than 100 meters. It is precisely this habitat type that our captains most depend on to provide successful fishing for our customers.

While the proposed actions are state-wide in nature, they disproportionately cost public access from Santa Barbara and Santa Cruz harbors. In areas closed to fishing the lost fishing access has so far not been compensated for by additional public participation based on an area being closed to fishing. Fishing participation transcends physical ability, socioeconomic strata, educational levels, cultural backgrounds, creeds and colors in ways SCUBA diving and underwater photography participation commonly does not.

Petition 2023-23MPA

This petition proposes to reclassify Duxbury Reef SMCA to an SMR and Expand the Southern and Northern Boundaries

Deny all proposed new restrictions to take and seaward boundary expansions in concurrence with the CDFW recommendations

The CDFW notes the following: "The petitioner asserts that current regulations cause confusion and that there has been an increase in non-compliance relative to other Marin County MPAs. These claims are unsubstantiated by CDFW enforcement data. The proposed change would not result in additional regulatory protection for the rocky intertidal habitat that the current MPA was designed to protect, and it would unnecessarily eliminate established uses previously vetted during the Marine Life Protection Act (MLPA) Initiative planning process."

Member vessel owners and operators with the Golden Gate Fisherman's Association (GGFA a SAC affiliate member) note "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...Further closures in areas like Duxbury Reef remove historically important fishing grounds without sufficient consideration of social, economic, and access-related impacts."

GGFA members provided this broader comment on proposals that expand the area that the public is excluded from fishing. "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."

The SAC as a whole concurs with these SAC members' perspective.

The GGFA respects the CDFW's support for extending the intertidal invertebrate protections within this proposal "Grant in concept." This would allow the public's continued access to fish from shore. Most of our clients participate in surf fishing as well. Many if not most were first introduced to the rewards and the personal gratification that comes from harvesting one's own foods from the wild by it.

Petition 2023-24 proposal to expand the spatial extent of the prohibition of public access for fishing off the City of Laguna Beach.

Deny (in concurrence with the CDFW recommendation and rationale)

The Department found that the proposal does not "address a current or emerging MPA management challenge or align with the original intent of these MPAs as established during the MLPA Initiative planning process." They found that the proposed action would not further the proposer's stated objectives within their petition – ease of enforcement, kelp protection, whale entanglement risk.

We concur. We also note that the proposer's purpose appeared contrary to providing equitable access to a public trust resource for underserved communities (fishing within the state's submerged lands).

Rather, the intent appears to be an effort to further the relative exclusion of the public from the shorelines and coastal waters offshore of the economically exclusive community of Laguna Beach.

Our fleet out of Dana Point Harbor regularly takes the public to fish in the waters proposed for closure, a 1.3-mile stretch of some of the most scenic coastline in the state. The loss of access to fish these waters would halve the beautiful near-coastal fishing area north of Dana Point Harbor, where rocky headlands and deep secluded coves predominate.

A roughly 2.5-mile stretch immediately up-coast of the Dana Point Harbor, it is precisely these coves and headlands where the charter fleet out of Dana Wharf Sportfishing and Whale Watching takes organized groups of underserved youth, disabled veterans and others that are on limited time schedules or mobility challenged to experience recreational fishing in beautiful and inspiring surroundings.

Petition 2023-34MPA

Reclassify Point Buchon SMCA to an SMR and Limit Allowable Uses at Farnsworth Onshore and Offshore SMCAs to Recreational Spearfishing

Deny (in concurrence with the CDFW recommendation and rationale)

Within their analysis the Department notes the extensive deliberations by the various stakeholders during the 2-year Southern Region MLPAI Regional Stakeholder Group process. The take allowances at the Farnsworth MPA cluster were carefully considered and vetted, resulting in the current configuration and take allowances.

These take allowances provide important public access to mobile species which largely do not benefit from spatially based protections. At the same time the cluster provides spatially based protections for demersal, sessile and resident species including Stylaster hydrocoral, at scale.

The Farnsworth Bank is very important to our Santa Monica Bay, Los Angeles, Long Beach, Newport Bay and Dana Point Harbor based party boats' access to target squid, bonito, yellowtail, white sea bass and other species. The regionally famous "Farnsworth mossback yellows" are fish of legend – difficult to land once hooked but a true prize and badge of honor if successful.

The Department's analysis of these proposed actions (2023-34MPA_2 & 2023-34_3) provide "...further reductions to the fishing grounds and restricting take to spearfishing only would impose socioeconomic costs without clear ecological benefit. From an MPA Network design perspective, the Farnsworth SMCAs fulfill their intended role as partial-take MPAs with a High LOP..."

The Farnsworth is a site where avid anglers desire to fish big-game -- where the challenge is elevated but so is the potential reward.

In conclusion, we applaud the efforts of the scientists, regulators and staff from CDFW and the CFGC for their extraordinary effort to review and communicate with the community on this important topic. We strongly feel working together we can continue to strengthen the network through research, monitoring and targeting water quality issues.

Sincerely,

Jaime Diamond

Jaime Diamond

Stardust Sportfishing, Owner

Santa Barbara Landing, CEO/GM

Jason Diamond

Captain Jason Diamond

Stardust Sportfishing, Owner/Operator

Santa Barbara Landing, Partner

Outlook

SAC Letter to FGC Ref Agenda Item 2, April 15, 2026

From K Fran [redacted]
Date Mon 03/30/2026 05:49 PM
To FGC <FGC@fgc.ca.gov>

Hi Melissa,

I hope all is well. I am sure you are all working very hard.

Please find attached a letter from SAC to the FGC for the next meeting. I plan to be there in person.

Best wishes,

Ken

Ken Franke

President

Sportfishing Association of California

5060 N. Harbor Drive, Suite 165 | San Diego, CA, 92106
(619) 760-4031 | www.californiasportfishing.org

SAC SPORTFISHING ASSOCIATION OF CALIFORNIA

5060 N. Harbor Drive, Suite 165
San Diego, CA 92106
(619) 760-4031

March 28, 2026

To: California Fish and Game Commission (CFGC)
From: Sportfishing Association of California
Subject: Bin 2 Non-Tribal Petition analysis by the CDFW

The Sportfishing Association of California (SAC) is an organization whose membership includes commercial passenger fishing vessels (CPFV) based throughout the coastal ports of California. We provide public access to over one million visitors annually for fishing, whale watching and ocean charters.

The MPA network was developed after an extensive and often extremely stressful process. Recreational anglers and related vessel service providers had to adapt to the loss of access to approximately fifty percent of their traditional fishing areas.

That was then. Now everyone has adapted to the framework after what was a painful time. It is proving to be resilient. Trust has been built as recreational anglers and vessels from the CPFV sector have been involved in the study of the MPA network.

SAC appreciates and complements the analyses of the non-tribal bin 2 2023 MPA petitions submitted in response to the Decadal Management Review recognizing the adaptive management component of the Marine Life Protection Act.

In 2023 the "draft evaluation framework (Draft Framework) was developed for the 15 Bin 2 Petitions that propose changes to the Marine Protected Area (MPA) Network that were received by the California Fish and Game Commission (CFGC) and referred to the California Department of Fish and Wildlife (CDFW) in 2023. CDFW developed the Draft Framework, with support from staff at the CFGC and Ocean Protection Council (OPC), based on the adaptive management process outlined in chapter 4 of the 2016 Master Plan for MPAs. The 2016 Master Plan directs CDFW and CFGC to use the Marine Life Protection Act (MLPA) goals and mandates, MPA objectives, and design considerations as the primary basis for any action taken to make changes to the MPA Network. The Draft Framework also draws from the Decadal Management Review (DMR) and recommendations, and the MPA Regulation Change Petition Framework approved by CFGC at their August 2023 meeting, which is rooted in the DMR recommendation cornerstones of MPA Governance, MPA Management Program Activities, and MPA Network Performance." (Evaluation Framework for 2023 Marine Protected Area Bin 2 Petitions at https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=232901&inline).

Within this framework there were 18 approved target questions, 3 of which contained follow-on components which brought the total to 21. The CDFW has diligently provided a question-by-question analysis for each proposed action within each of the 10 non-tribal bin 2 proposals. A simplified 3-column table provides a brief summary of the results of these analyses along with a concise recommendation for each action.

We appreciate and complement the Department on their having held these 21 goalposts firm in their analyses, supporting these primary objectives.

- The proposed change is consistent with the goals of the MPA, as identified in the MLPA Initiative planning process, and may help further advance these goals.
- The proposed change improves the overall design of the MPA.
- The proposed change aligns with the original intent of the MPA.
- The proposed change advances management of the MPA Network.

We support the Department's work product and recommendations. We find that the Department has exhaustively researched and cited the components of the MLPAI process which illuminate the choices and considerations within that process and used that information to guide their analyses and recommendations.

Below we provide our recommendations to the Commission for those non-tribal petitions that would have important impacts to our fleet. We consider the implications of the proposed actions that have the greatest potential to impact our ability to provide public access to the state's rich and sustainably managed marine resources, our continued economic vitality and the overall continued sustainable management of our fisheries.

Petition 2023-23MPA

This petition proposes to reclassify Duxbury Reef SMCA to an SMR and Expand the Southern and Northern Boundaries

Deny all proposed new restrictions to take and seaward boundary expansions in concurrence with the CDFW recommendations

The CDFW notes the following: "The petitioner asserts that current regulations cause confusion and that there has been an increase in non-compliance relative to other Marin County MPAs. These claims are unsubstantiated by CDFW enforcement data. The proposed change would not result in additional regulatory protection for the rocky intertidal habitat that the current MPA was designed to protect, and it would unnecessarily eliminate established uses previously vetted during the Marine Life Protection Act (MLPA) Initiative planning process."

Member vessel owners and operators with the Golden Gate Fisherman's Association (GGFA a SAC affiliate member) note "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...Further closures in areas like Duxbury Reef remove historically important fishing grounds without sufficient consideration of social, economic, and access-related impacts."

GGFA members provided this broader comment on proposals that expand the area that the public is excluded from fishing. "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."

The SAC as a whole concurs with these SAC members' perspective.

The GGFA respects the CDFW's support for extending the intertidal invertebrate protections within this proposal "Grant in concept." This would allow the public's continued access to fish from shore. Most of our clients participate in surf fishing as well. Many if not most were first introduced to the rewards and the personal gratification that comes from harvesting one's own foods from the wild by it.

Petition 2023-24 proposal to expand the spatial extent of the prohibition of public access for fishing off the City of Laguna Beach.

Deny (in concurrence with the CDFW recommendation and rationale)

The Department found that the proposal does not "address a current or emerging MPA management challenge or align with the original intent of these MPAs as established during the MLPA Initiative planning process." They found that the proposed action would not further the proposer's stated objectives within their petition – ease of enforcement, kelp protection, whale entanglement risk.

We concur. We also note that the proposer's purpose appeared contrary to providing equitable access to a public trust resource for underserved communities (fishing within the state's submerged lands).

Rather, the intent appears to be an effort to further the relative exclusion of the public from the shorelines and coastal waters offshore of the economically exclusive community of Laguna Beach.

Our fleet out of Dana Point Harbor regularly takes the public to fish in the waters proposed for closure, a 1.3-mile stretch of some of the most scenic coastline in the state. The loss of access to fish these waters would halve the beautiful near-coastal fishing area north of Dana Point Harbor, where rocky headlands and deep secluded coves predominate.

A roughly 2.5-mile stretch immediately up-coast of the Dana Point Harbor, it is precisely these coves and headlands where the charter fleet out of Dana Wharf Sportfishing and Whale Watching takes organized groups of underserved youth, disabled veterans and others that are on limited time schedules or mobility challenged to experience recreational fishing in beautiful and inspiring surroundings.

Petition2023-27MPA-AM1 – new restrictions on anchoring within the existing Anacapa Island SMR/SMCA complex.

Deny (in concurrence with the CDFW recommendation and rationale)

There is little evidence that the current allowance of anchoring in these waters is having an enduring negative impact on seagrass beds in this area. Seagrass in the area is predominantly Zostera Marina, a resilient flowering plant that propagates predominantly through sub-benthic rhyzomes lying buried beneath the seafloor in soft bottom substrates.

Its appearance and density above the bottom varies seasonally and season to season. Primary influences on its abundance are lighting (water clarity and depth), appropriate substrate,

surge and current strength. The impact of anchoring, should it happen to be within an area colonized by Zostera, is minimal and temporary. Current levels of anchoring in the area are relatively low and sea grass beds disturbed quickly recover.

Members or our fleet do fish within this SMCA and appreciate the access to coastal pelagic species there. Anchoring is part of that activity and this proposal leaves open the potential for an anchoring prohibition that would adversely impact that fishing opportunity for the public.

Petition 2023-33MPA

This petition proposes the following MPA expansions and new MPAs

i. Cabrillo SMR - expand westward and northward by 15.2 sq mi ~9.9 sq mi

ii. Point Dume SMCA - expand westward by 4.6 sq mi

iii. South Point SMR - expand westward by 26.3 sq mi

iv. Gull Island SMR - expand northward by 1.8 sq mi

v. Point Conception SMR - expand eastward by 14.6 sq mi

vi. Natural Bridges SMR - expand southward by 13.7 sq mi, eastward to the edge of Natural Bridges State Beach by ~14.5 sq mi

vii. Pleasure Point, Santa Cruz - designate 3.2 sq mi as a new State Marine Reserve Conservation Area

Deny (in concurrence with the CDFW recommendation and rationale)

This petition is a bold "land grab" which proposes to turn vast areas of prime, valued rocky reef habitat, especially in waters of less than 100 meters, into marine parks that ban fishing. This habitat type is already over-represented within our MPA network as compared to its natural occurrence in state waters. These proposed actions are completely out of line with the guidance provided for adaptive management measures to be considered by the Commission, which offered that this would not be MLPA-2.

To date our award winning MPA network has shown that a larger biomass-per-area of the species that fisheries target has developed within our MPAs. This state-wide result is driven by differences observed in the southern regions.

What has not been observed within the scientific monitoring effort was a difference in fish diversity, or ecosystem resistance to change (due to the recent marine heat wave). While these kinds of benefits have been observed globally that they were not here indicates two things.

The first is if there are differences in ecosystem resilience or species diversity between waters inside and outside of MPAs in California, the scale of the difference is likely to be small.

The second is quite revealing and illuminates that the existing robust fisheries management and environmental protections are already protecting biodiversity and ecosystem resilience at a very high level statewide. What's missing is only robust protections from future industrialization. However, this is something that is provided for within the National Marine Sanctuary waters.

The petitioners proposed actions would exclude fishing from vast areas of rocky bottom habitat in waters less than 100 meters. It is precisely this habitat type that our captains most depend on to provide successful fishing for our customers.

While the proposed actions are state-wide in nature, they disproportionately cost public access from Santa Barbara and Santa Cruz harbors. In areas closed to fishing the lost fishing access has so far not been compensated for by additional public participation based on an area being closed to fishing. Fishing participation transcends physical ability, socioeconomic strata, educational levels, cultural backgrounds, creeds and colors in ways SCUBA diving and underwater photography participation commonly does not.

Petition 2023-34MPA

Reclassify Point Buchon SMCA to an SMR and Limit Allowable Uses at Farnsworth Onshore and Offshore SMCAs to Recreational Spearfishing

Deny (in concurrence with the CDFW recommendation and rationale)

Within their analysis the Department notes the extensive deliberations by the various stakeholders during the 2-year Southern Region MLPAI Regional Stakeholder Group process. The take allowances at the Farnsworth MPA cluster were carefully considered and vetted, resulting in the current configuration and take allowances.

These take allowances provide important public access to mobile species which largely do not benefit from spatially based protections. At the same time the cluster provides spatially based protections for demersal, sessile and resident species including Stylaster hydrocoral, at scale.

The Farnsworth Bank is very important to our Santa Monica Bay, Los Angeles, Long Beach, Newport Bay and Dana Point Harbor based partyboats' access to target squid, bonito, yellowtail, white sea bass and other species. The regionally famous "Farnsworth mossback yellows" are fish of legend – difficult to land once hooked but a true prize and badge of honor if successful.

The Department's analysis of these proposed actions (2023-34MPA_2 & 2023-34_3) provide "...further reductions to the fishing grounds and restricting take to spearfishing only would impose socioeconomic costs without clear ecological benefit. From an MPA Network design perspective, the Farnsworth SMCAs fulfill their intended role as partial-take MPAs with a High LOP..."

The Farnsworth is a site where avid anglers desire to fish big-game -- where the challenge is elevated but so is the potential reward.

Petition 2023-29MPA, and absent CDFW recommendations,

DENY (based on the following)

Petitioners propose the establishment of a new State Marine Conservation Area off the coast of Carpinteria. This proposal is redundant, scientifically unsupported, reduces public access to all but the documented members of the Federally recognized Santa Ynez Band of Chumash. It creates an undue burden on a region already heavily impacted MPA fisheries closures.

Tribal Stewardship and Co-Management

We continue to support California's commitment to tribal sovereignty and co-management of native resources. However, we emphasize that tribal stewardship does not require the creation of new MPAs.
Tribal stewardship is currently a component of the MPA framework under the MLPA Master Plan. There are four MPA's allowing the Santa Ynez Band of Chumash exclusive fishing access at Anacapa SMCA, Naples Reef SMCA, Point Dume SMCA, and Kashtayit SMCA. Tribal exemptions allow traditional and ceremonial take. These examples demonstrate that the state can honor its commitment to tribal sovereignty and Traditional Ecological Knowledge (TEK) by modifying current regulations without closing additional area to public access for fishing. This was most recently done at the August 22, 2018 FGC meeting.

The Santa Ynez Band of Chumash previously submitted a petition for Tribal Take within several existing MPA's. In 2018, after a full analysis, the FGC approved their petition. (FGC Decision Document 08-22-2018) The new petition 2023-29MPA is exclusionary in nature. The area they propose is currently open and accessible to the public and all tribal members regardless of federal recognition. If implemented this new closure would exclude access for all others, including descendants of local Chumash who also have ancestral ties to these waters but are not registered members of the Santa Ynez Band. True collaborative co-management should be explored across California's entire MPA network to ensure equitable access for all tribal members. We encourage you to prioritize collaborative management at these existing sites. Additional closures which eliminate access for non-federally recognized tribes and the public are not needed, nor appropriate.

Scientific Rationale for Denial

The scientific justifications provided in the petition are fundamentally flawed:
Connectivity: The petition argues for a new MPA to fill a gap in the network. However, official measurements show the spacing between existing MPAs at Campus Point and Point Dume is 60.60 miles, which falls within the state's recommended 31–62 mile spacing guideline, making a new designation unnecessary.

Species-Specific Protection: The petition focuses heavily on protecting juvenile white shark nurseries. The Fish and Game Commission established clear precedent in 2020 when it denied a nearly identical petition for this exact location, stating that MPAs are intended to protect entire ecosystems, not individual, highly mobile species like sharks.

The petitioner proposes allowing shore-based finfish take, which reduces the area's Level of Protection to moderate-low. Under the MLPAI SAT guidance this LOP would not support MPA connectivity goal.

Disproportionate Regional Impact

The Santa Barbara Channel is already one of the most protected regions in California With 19 MPA's. Currently, 21% of Channel Islands National Marine Sanctuary waters in this area are protected, significantly exceeding the state average of 16%. Furthermore, 96.41% of the Channel Islands MPA network is designated as no-take, compared to a 60% average for the

rest of the state. Closing Carpinteria would further marginalize local recreational fishermen who have already seen their traditional grounds significantly reduced.

Carpinteria Reef, the reef that would be almost entirely inside the proposed MPA, is one of relatively few reef areas close to harbor for fishing. Approving this petition will be the end of local fishing access to coastal reefs. It will totally exclude opportunity for those who cannot afford or safely travel across to the Channel Islands such as skiffs, kayak fishermen and freedivers. The reefs in the protected waters of the proposed MPA are where charter boats take first timers, trips with special needs children, and our wounded warriors due to close proximity to the harbor, generally protected area from weather, and the variety of fish habitat in this zone. There is also an overwhelming amount of public outcry on this petition due to a lack of meaningful local outreach. The Carpinteria reef area is vital to the local community, economy, local charter businesses, and tourism. Closing this area to fishing would ignore carefully negotiated outcome for this region during the MLPAI process. It would greatly reduce access for all non-Santa Ynez Band Chumash tribal people as well as create regulatory conflicts in the planned decommissioning of oil infrastructure in the area. We respectfully urge you to deny Petition 2023-29MPA---

In conclusion, we applaud the efforts of the scientists, regulators and staff from CDFW and the CFGC for their extraordinary effort to review and communicate with the community on this important topic. We strongly feel working together we can continue to strengthen the network through research, monitoring and targeting water quality issues.

Sincerely,

Ken Franke
President

Outlook

Marine Conservation Institute Comments on CDFW Recommendations for MPA Petitions

From Ali Rubin <ali.rubin@marine-conservation.org>
Date Tue 03/31/2026 03:02 PM
To FGC <FGC@fgc.ca.gov>

Dear Commissioners,

On behalf of Marine Conservation Institute, please find attached our comments on the California Department of Fish and Wildlife's Evaluations and Recommendations for the ten non-Tribally-led Marine Protected Area (MPA) petitions released on March 20, 2026 .

We appreciate your consideration of these comments and your continued work to advance effective marine conservation in California.

Sincerely,
Ali Rubin

Ali Rubin
Marine Conservation Scientist

Marine Conservation Institute

ali.rubin@marine-conservation.org
marine-conservation.org

Marine Conservation Institute

March 31, 2026

President Eric Sklar
California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244-2090
Submitted electronically to: fgc@fgc.ca.gov

Re: Comments from Marine Conservation Institute on petitions to amend the State's MPA network.

Dear California Fish and Game Commission,

On behalf of Marine Conservation Institute, we appreciate the opportunity to provide comments following the California Department of Fish and Wildlife's (CDFW) Evaluations and Recommendations for the ten non-Tribally-led Marine Protected Area (MPA) petitions released on March 20, 2026.

Marine Conservation Institute works to secure strong protection for the ocean's most important places. Through our Marine Protection Atlas (MPAtlas), we assess marine protected areas globally using The MPA Guide, a peer-reviewed framework that evaluates the level of protection and expected conservation outcomes of MPAs. Our work supports governments and partners, including in California, in advancing effective, science-based marine conservation and achieving 30x30 goals.

We recognize the significant effort undertaken by CDFW to evaluate these petitions based on the information available as of March 2025, and we appreciate the Department's acknowledgment that additional information may continue to inform Commission deliberations. As California works toward protecting 30% of state waters by 2030, maintaining the integrity and effectiveness of the existing MPA network is essential to achieving meaningful conservation outcomes.

As part of this effort, we conducted an analysis to determine the likely biodiversity outcomes of the petitions submitted to the State using The MPA Guide framework. This approach applies a consistent, science-based method to evaluate how proposed changes would affect protection levels and conservation outcomes across California's MPA network.

We strongly support CDFW's recommendations to deny petitions that would lower protection levels within California's MPA network by allowing additional recreational or commercial take of marine life. Scientific evidence consistently demonstrates that the greatest ecological benefits such as increased biomass, biodiversity, and ecosystem resilience are achieved in MPAs that are fully or highly protected from extractive activities.

We also acknowledge that localized ecological pressures, such as sea urchin overpopulation and kelp loss, may require active management. In these cases, we encourage the Commission to explore adaptive, site-specific management strategies that address these threats without reducing protection levels or opening extractive fisheries within MPAs.

In particular, we support the recommendations to deny the following petitions:

- Modify Take in 9 SMCAs to Allow Commercial Take of Sea Urchins (2023-14MPA)[1]
- Reclassify Footprint, Gull Island, and Santa Barbara Island SMRs to SMCAs to Allow Take of Highly Migratory Species (2023-15MPA_AM)
- Reclassify Stewarts Point and Bodega Head SMRs to SMCAs to Allow Commercial Salmon Trolling (2023-16MPA)
- Modify Allowed Uses at Several Santa Barbara Channel MPAs and Special Closures: Vandenberg SMR, Kashtayit SMCA, and San Miguel and Anacapa Special Closures (2023-18MPA)

1: With the exception of the Point Vicente no-take SMCA, petition 2023-14MPA does not lower the Highly Protected status of the named MPAs per our MPA Guide analysis, and may provide ecological benefits through the restoration effort of urchin culling. However, while ecosystem restoration and conservation may be complementary, they are non-substitutable actions where priority should be given to preventing the degradation of intact ecosystems.

These petitions propose changes that would reduce the level of protection in areas that currently contribute to the ecological performance of California's MPA network. Downgrading protections risks undermining biodiversity gains, weakening ecosystem resilience in the face of climate change, and compromising California's leadership in marine conservation.

To advance the state's goal of protecting 30% of nature by 2030, we do believe that the following proposals will modestly strengthen the network and urge the commission to support them:

- Designate new MPA as Chitqawi SMCA (2023-19MPA)
- Redesignate Point Buchon SMCA as Chumash SMCA to support tribal co-management and take provisions; extend northern boundary of Point Buchon SMR (2023-20MPA)
- Multiple changes to Pyramid Point SMCA (2023-21MPA)
- Reclassify all or part of Anacapa Island SMR (2023-27MPA)
- Designate new MPA as Point Sal SMR (2023-28MPA)
- Add new MPA as Mishopshno SMCA near Carpinteria (2023-29MPA)
- Reclassify and expand Duxbury Reef SMCA (2023-32MPA)
- Reclassify Point Buchon SMCA and modify regulations in Farnsworth MPAs (2023-34MPA)

California's MPA network is widely recognized as a global model for science-based ocean protection. Maintaining strong protections within this network is critical not only for achieving the State's 30x30 commitments, but also for ensuring long-term conservation benefits for marine ecosystems and coastal communities.

We respectfully urge the Commission to uphold CDFW's recommendations to deny these petitions and to continue advancing policies that strengthen, rather than diminish, the effectiveness of California's MPA network.

Thank you for your consideration.

Respectfully,

Lance E. Morgan, President
Nikki Harasta, Marine Conservation Scientist I
Alexandra Rubin, Marine Conservation Scientist I

Received at California Fish and Game Commission
April 1, 2026

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

From: Matthew Bond

Sent: Saturday, April 4, 2026 4:56 PM

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

Subject: April 14 Tribal Committee Meeting Comment From Allwaters Re Tribal MPA Petition Review Process and Tribal MPA Petitions

Hello,

Please find our comment attached.

Thank you.

Matt Bond

Allwaters.

March 30, 2026

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

Submitted electronically to fgc@fgc.ca.gov

Re: 04/14/2026 Fish and Game Commission Tribal Committee Meeting Agenda Item 4

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

My name is Matt Bond and I'm commenting on behalf of Allwaters Protection and Access Coalition. Please accept our thoughts on the Tribally led or co-led MPA petitions being evaluated by the Commission.

Because we are now unclear as to the process being used to evaluate these petitions and it doesn't seem we will be able to comment on them at the bio regional meetings, we are taking this opportunity to share our recommendations and supporting analysis with the Commission. We are equally uncertain if the guidelines we have been working with for the past two and a half years are still valid for this set of petitions. Stakeholders, The Commission and The Department were working with the understanding that petition analysis and decisions would be based on SAT guidelines from original MLPA, The Master Plan for MPAs, as much as possible site specific or at least locally relevant scientific analysis, and other historically relevant information. We are no longer sure this is the case. We strongly encourage this Committee to recommend to the full Commission that these petitions continue to be evaluated by the Department in the same manner the non-tribal petitions were. Creating a separate framework, outside of what is called for by the MLPA, potentially serves as a barrier to trust and participation and may result in outcomes that harm both the marine resources you are charged with managing as well as the people who depend on them for health, recreation, and sustenance. The following are our opinions and corresponding rational, based on the original, agreed upon process.

Petition2023-19MPA – Reject or Modify

Petition 19 requests the creation of a tribal co-managed SMCA at Morro Bay that only allows for the recreational take of finfish and invertebrates except rock scallops and mussels by hand harvest, also including a tribal take exemption within the SMCA. We believe the petition should be either rejected or amended to allow for more general recreational and commercial take as well.

We believe tribal co-management to be a great step forward in managing California's waters and should be present in all MPAs; however, creating a new MPA that restricts

exclusively commercial groups and most recreational fishing access from such an essential area should not be warranted. The commercial blocks overlapping the proposed SMCA account for 6.2% of Morro Bay's landing revenue alone. More specifically, these blocks represent 25% of the area's squid landings, 8.8% of the groundfish landings, and 15% of the area's salmon landings, per the MFDE. While not an exact correlation, recreational access in the area is likely comparable (with the exception of squid) and will likely be equally affected in the MPA regions, as this petition affects all fisheries not involving direct hand harvesting.

Additionally, there is concern that the proposed offshore wind energy program has its proposed electrical lines connecting the Morro Bay power bank stations to the offshore array crossing through the SMCA. If passed, this would need to be addressed and an additional allowance added.

Petition2023-20MPA – Reject Nearshore and Clarify/Accept Offshore

Petition 20 requests changes to the MPA cluster, the nearshore and offshore MPAs, at Point Buchon. The petition requests the offshore SMCA allow the hand harvest of finfish and invertebrates except rock scallops and mussels, allow the maintenance of artificial structures under the correct permits, and provide a tribal take exemption for federally recognized tribes. However, it is unclear if these requested allowances to the offshore SMCA at point Buchon are replacing or adding to existing recreational and commercial allowance for the take of albacore and salmon. Pursuant to the allowances being additive and not replacing the existing take allowances in the offshore MPA we support the request for the offshore region of the MPA cluster to have the added take allowances. This example in the offshore region is a clear example of how tribal components can be added to the existing network, not requiring creation of more MPAs to involve tribes.

Regarding the petitioner's request to the nearshore SMR being expanded, we believe this request should be rejected. The expansion of only the SMR section of the Point Buchon nearshore/offshore cluster would unnecessarily remove all access from the added area. The justification for this addition comes from MPA Collaborative meetings citing enforcement concerns, stating that moving the northern boundary to the physical point will provide a better reference for enforcement. The core reason the existing MPA does not go to the physical point on land is because the nearest whole decimal degree value was used as the northern boundary instead, following MLPA guidelines. This usage of a round Lat/Long number for an MPA that does not experience much shore fishing opportunity is supported by the MLPA MPA design criteria to explicitly help, not hurt, enforcement. The current northern boundary gives those fishing beyond shore an easy to understand GPS reference point to know where the boundary is. Additionally, expanding only the nearshore SMR may cause further enforcement problems with the offshore SMCA remaining its original size. The expansion of the nearshore only leads to a case of an unevenly sized MPA in the nearshore and offshore regions.

Petition2023-21MPA – Accept

Petition 21 requests the Pyramid Point SMCA in the northern bioregion be modified to remove its existing recreational allowances for take of surf smelt and give additional tribal exemption to the Tolowa Dee-ni' Nation on top of its existing tribal exemption. The petition also requests the border of the MPA be moved south to the true CA-OR state boundary line, slightly shrinking the MPA.

While this petition does remove some recreational access to take surf smelt, that access was already relatively limited and small scale. The change to the border to shrink the SMCA to align to the actual state border clears up any possible confusion or issues the overlap currently causes. Overall we are supportive of this change, and addition of another Tribal component to the existing Pyramid Point SMCA.

Petition2023-28MPA-AM1 – Reject

Petition 28 requests the establishment of a new MPA around Point Sal. This MPA would significantly impact local fisheries, recreational and commercial, despite the petitioner's claim that the effects would be minimal. For this primary reason we believe the petition should be rejected, even as amended to allow for shore based take of finfish.

The petition includes an economic analysis of the proposed area but overlooks the devastating local impacts this MPA would have economically. While the petition accurately states that the overlapping commercial fishing blocks contribute to 1.1% of the central coast's total landings by value, it fails to consider the actual local implications of that 1.1% and what it represents. Using the same time range (2012 to 2022) on the MFDE, the local port nearest to the proposed MPA, Port San Luis/Avila, derived 28.12% of its total commercial revenue from the overlapping blocks 631 and 632. More specifically, 25.92% of the port's groundfish revenue and 57.79%, over half, of its crab revenue came from these areas. If recreational effort even somewhat mirrors commercial effort in the area, not only is Point Sal relevant commercially, but recreationally too offshore. Establishing an MPA at Point Sal will significantly harm the community of Avila and other nearby ports, threaten local businesses, harm or remove people's sources of income, and remove recreational and subsistence access to the area by boat.

Providing shore based take of finfish would allow for beach anglers to continue fishing as they have been, but would do so at the loss of all offshore activity. More notably, this also results in a drop of the LOP of the SMCA to moderate-low. This LOP ranking per the MLPA fails any connectivity requirements making the final proposed SMCA a protected area that does not add to total MPA network connectivity. This brings into question the main argument of the petitioner to add this MPA in order to maintain MPA connectivity, as the final amended SMCA would not accomplish this.

Petition2023-29MPA-AM1 – Reject

Petition 29 requests a new MPA be created at Carpinteria. This MPA would be a tribally allowed SMCA that would be closed to non-federally recognized tribal fishing (general recreational and commercial fishing); the petition was amended to reduce its overall size and allow shore-based take of finfish. The petition's three primary arguments for the new SMCA are to meet habitat connectivity/MPA spacing requirements, to protect habitat surrounding juvenile white shark grounds, and to allow for tribal access. While tribal co-management of all California MPAs should be considered, we believe for the following reasons this specific MPA proposal should be rejected.

Regarding habitat connectivity, the petition asserts that the spacing of the existing MPA network exceeds the recommendations set by the MLPA scientific advisory team, which suggests a minimum spacing of 31 to 62 miles. The petition argues that the nearest coastal MPAs, Campus Point and Point Dume, are too far apart, claiming they are separated by 63.8 nautical miles or 73.4 miles (Image 1).

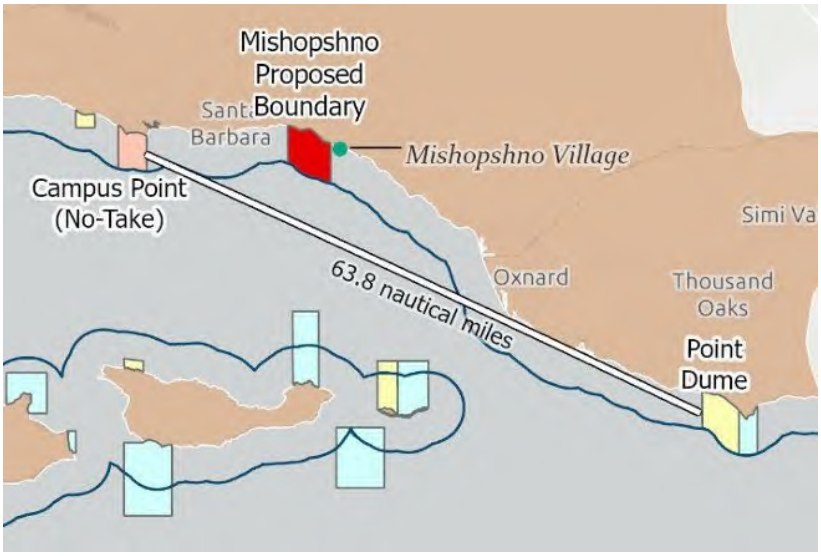


Image 1: Petition 29's image displaying proposed area and claimed spacing between existing Pt. Dume and Campus Point SMAs to be 63.8 nm (73.4 mi), which, if true, would exceed the southern MLPA MPA spacing requirements.

Note: the shown MPA is the original, pre-amendment size.

Discussions with the CDFW clarified that MPA spacing is measured by the, "shortest distance over water between two MPAs." When measuring the distance between Campus Point and Point Dume, we find that it is in fact less than 62 miles, indicating that the current spacing distribution is adequate along the coast (see below Image 2).

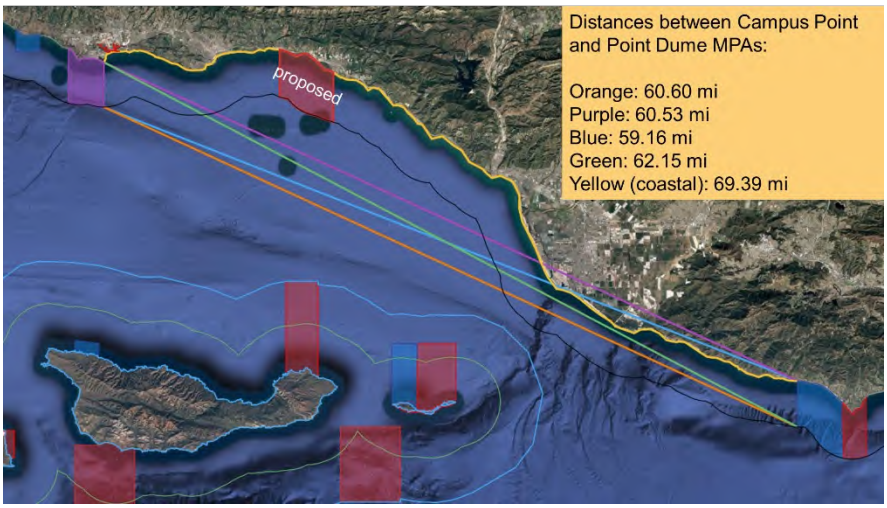


Image 2: Actual spacings between nearest existing MPAs around the proposed site. All but one straight line measurement exceeds 62 miles. The length that would be used by CDFW according to their provided input would be 60.60 mi (orange line) which falls within the spacing requirement.

Following the CDFW and MLPA guidelines, the shortest water distance between the two existing MPAs is ~60.60 miles, viewable by the orange line. This distance falls within the 31–62-mile MLPA spacing requirement. None of the provided measurements, including a measurement along the coastline (yellow) exceeded 73.4 miles of separation as the petitioner claims, again bringing into question the purpose for the new MPA if connectivity is already met.

In addition, the provided shore based take of finfish does allow for some form of recreational take but this now raises connectivity concerns. As mentioned in previous petitions, allowance of shore fishing of finfish reduces an MPAs LOP to moderate-low, losing its MPA connectivity with the network, this is confirmed by SeaSketch. Connectivity was a major reason for this MPAs proposal. With connectivity now lost due to these allowed take methods begs to question the purpose for this implementation in the first place if its foundational goals are not even accomplished. The LOP chart for the southern bioregion, moderate low protection is provided below.

	Mod-low	**SMCA SMP**	**Shore fishing** (H&L, hoop net); **kelp bass, barred sand bass, lingcod, cabezon, and rockfish** (H&L, spearfishing); **sheephead** (H&L, spearfishing, trap); **spotted sand bass and halibut** (H&L); **lobster** (trap, hoop net, diving); **urchin** (diving); **rock crab and Kellet's whelk** (trap); **catch and release** (H&L-general) **In water depth <10m: Catch and release** (H&L-single barbless hooks and artificial lures) **In water depth <50m at islands and <30m on mainland: pelagic finfish, bonito and white seabass** (H&L);

Regarding the protection of juvenile white shark nursery grounds, a similar petition was submitted in 2020 (Petition 2020-012 AM1) to close off a smaller section of beach at Carpinteria for the same purpose. Like Petition 29, this earlier petition aimed to protect juvenile white sharks within the currently proposed area. This 2020 petition was rejected by the Department and the Fish and Game Commission (FGC), which stated that MPAs are designed to protect nearshore ecosystems rather than individual species, especially

highly migratory species like white sharks. Given that this issue was previously addressed at the same location just four years ago, the same arguments against the current petition apply today regarding white sharks.

Lastly, regarding the tribal access portions of the petition, while tribal access and co-management should be explored across the entire MPA network, current access to the area by tribes is not limited in any way. Regardless of a tribal MPA designation or not, federally recognized tribes will have access in the area just like the public. Closing this area off to all groups except those of the federally recognized Santa Ynez Band of Chumash Indians would have the additional side effect of restricting any non-federally recognized tribes, as the petition does mention. In addition to the above counter reasons of the petition's primary claims, there exists additional effects to be considered at the proposed MPA site. The proposed area was considered during the MLPA for the southern section but was traded off for two other SMCAs on the coast, Naples and Kashtayit that were present in different MPA alternatives that Carpinteria was not in. If allowed, the new MPA would essentially break the agreements struck during the MLPA. Lastly, the pre- and post-amended boundaries overlap existing oil infrastructure that is maintained year round, no existing exemptions or conversations have been had regarding this infrastructure overlap. For these reasons we believe the petition should be denied.

Thank you very much for this opportunity to comment and for your dedicated work in supporting both the interests of California's Tribal People as well as the health and perseverance of the natural resources shared in trust by all Californians.

Respectfully,

Matt Bond

Allwaters Protection and Access Coalition

FGC@FGC

From: John Hood
Sent: Monday, April 6, 2026 1:53 PM
To: FGC
Subject: Expanding California's Marine Protected Area

Categories: Exhibit

April 6, 2026

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

Re: Support for Petitions 2023-28MPA and 2023-29MPA

Dear President Zavaleta and Honorable Commissioners:

I am writing to express my family's 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. As a family with longstanding roots with these coastal regions, conserving these two special areas will help protect and restore ocean health. It will enhance coastal recreation experiences and help ensure Santa Barbara County's coastal economy thrives for decades to come. The Hood family urges 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,

John Hood

From: Dalia Aljawad
Sent: Thursday, April 9, 2026 11:33 AM
To: FGC <FGC@fgc.ca.gov>
Subject: In Support of the Mishopshno SCMA (Petition 2023-29MPA)

President Sklar and Honorable Commissioners,

Dear President Sklar and Honorable Commissioners,

I am a California resident writing in strong support of the Mishopshno State Marine Conservation Area (SMCA) (Petition 2023-29MPA) off the coast of Carpinteria.

The Mishopshno SMCA would protect important habitats that support rich biodiversity, such as kelp forest, rocky reef, sandy beaches, and a vital juvenile white shark habitat. Furthermore, I strongly support Mishopshno's tribal co-management by the Santa Ynez Band of Chumash Indians as a concrete step towards Indigenous marine stewardship. The designation of this MPA would honor the Chumash peoples' historical and present-day relationship with the Santa Barbara coast, and strengthen their stewardship of the area.

Research has shown that marine protected areas (MPAs) can bolster ecosystem resilience in the face of climate change, enhance local economies through tourism and ocean recreation, help overexploited fish and habitats bounce back, and keep our coasts healthier. The establishment of Mishopshno SMCA would also be a powerful step toward Governor Gavin Newsom's 30x30 goal, protecting California's marine life and coastal communities for generations to come."

We appreciate the Commission's work to protect our state's coastal habitats and biodiversity, which is critical now more than ever as we face the twin crises of climate change and biodiversity loss. I urge you to approve this proposal that aims to honor Chumash cultural and historical connections to the area, provide additional resilience in the face of climate change, and protect critical marine habitats.

Sincerely,

Dalia Aljawad
Laguna Niguel, California

Outlook

SAC Letter to FGC Ref Agenda Item 2, April 15, 2026

From K Fran [redacted]
Date Mon 03/30/2026 05:49 PM
To FGC <FGC@fgc.ca.gov>

Hi Melissa,

I hope all is well. I am sure you are all working very hard.

Please find attached a letter from SAC to the FGC for the next meeting. I plan to be there in person.

Best wishes,

Ken

Ken Franke

President

Sportfishing Association of California

5060 N. Harbor Drive, Suite 165 | San Diego, CA, 92106
(619) 760-4031 | www.californiasportfishing.org

SAC SPORTFISHING ASSOCIATION OF CALIFORNIA

5060 N. Harbor Drive, Suite 165
San Diego, CA 92106
(619) 760-4031

March 28, 2026

To: California Fish and Game Commission (CFGC)
From: Sportfishing Association of California
Subject: Bin 2 Non-Tribal Petition analysis by the CDFW

The Sportfishing Association of California (SAC) is an organization whose membership includes commercial passenger fishing vessels (CPFV) based throughout the coastal ports of California. We provide public access to over one million visitors annually for fishing, whale watching and ocean charters.

The MPA network was developed after an extensive and often extremely stressful process. Recreational anglers and related vessel service providers had to adapt to the loss of access to approximately fifty percent of their traditional fishing areas.

That was then. Now everyone has adapted to the framework after what was a painful time. It is proving to be resilient. Trust has been built as recreational anglers and vessels from the CPFV sector have been involved in the study of the MPA network.

SAC appreciates and complements the analyses of the non-tribal bin 2 2023 MPA petitions submitted in response to the Decadal Management Review recognizing the adaptive management component of the Marine Life Protection Act.

In 2023 the "draft evaluation framework (Draft Framework) was developed for the 15 Bin 2 Petitions that propose changes to the Marine Protected Area (MPA) Network that were received by the California Fish and Game Commission (CFGC) and referred to the California Department of Fish and Wildlife (CDFW) in 2023. CDFW developed the Draft Framework, with support from staff at the CFGC and Ocean Protection Council (OPC), based on the adaptive management process outlined in chapter 4 of the 2016 Master Plan for MPAs. The 2016 Master Plan directs CDFW and CFGC to use the Marine Life Protection Act (MLPA) goals and mandates, MPA objectives, and design considerations as the primary basis for any action taken to make changes to the MPA Network. The Draft Framework also draws from the Decadal Management Review (DMR) and recommendations, and the MPA Regulation Change Petition Framework approved by CFGC at their August 2023 meeting, which is rooted in the DMR recommendation cornerstones of MPA Governance, MPA Management Program Activities, and MPA Network Performance." (Evaluation Framework for 2023 Marine Protected Area Bin 2 Petitions at https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=232901&inline).

Within this framework there were 18 approved target questions, 3 of which contained follow-on components which brought the total to 21. The CDFW has diligently provided a question-by-question analysis for each proposed action within each of the 10 non-tribal bin 2 proposals. A simplified 3-column table provides a brief summary of the results of these analyses along with a concise recommendation for each action.

We appreciate and complement the Department on their having held these 21 goalposts firm in their analyses, supporting these primary objectives.

- The proposed change is consistent with the goals of the MPA, as identified in the MLPA Initiative planning process, and may help further advance these goals.
- The proposed change improves the overall design of the MPA.
- The proposed change aligns with the original intent of the MPA.
- The proposed change advances management of the MPA Network.

We support the Department's work product and recommendations. We find that the Department has exhaustively researched and cited the components of the MLPAI process which illuminate the choices and considerations within that process and used that information to guide their analyses and recommendations.

Below we provide our recommendations to the Commission for those non-tribal petitions that would have important impacts to our fleet. We consider the implications of the proposed actions that have the greatest potential to impact our ability to provide public access to the state's rich and sustainably managed marine resources, our continued economic vitality and the overall continued sustainable management of our fisheries.

Petition 2023-23MPA

This petition proposes to reclassify Duxbury Reef SMCA to an SMR and Expand the Southern and Northern Boundaries

Deny all proposed new restrictions to take and seaward boundary expansions in concurrence with the CDFW recommendations

The CDFW notes the following: "The petitioner asserts that current regulations cause confusion and that there has been an increase in non-compliance relative to other Marin County MPAs. These claims are unsubstantiated by CDFW enforcement data. The proposed change would not result in additional regulatory protection for the rocky intertidal habitat that the current MPA was designed to protect, and it would unnecessarily eliminate established uses previously vetted during the Marine Life Protection Act (MLPA) Initiative planning process."

Member vessel owners and operators with the Golden Gate Fisherman's Association (GGFA a SAC affiliate member) note "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...Further closures in areas like Duxbury Reef remove historically important fishing grounds without sufficient consideration of social, economic, and access-related impacts."

GGFA members provided this broader comment on proposals that expand the area that the public is excluded from fishing. "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."

The SAC as a whole concurs with these SAC members' perspective.

The GGFA respects the CDFW's support for extending the intertidal invertebrate protections within this proposal "Grant in concept." This would allow the public's continued access to fish from shore. Most of our clients participate in surf fishing as well. Many if not most were first introduced to the rewards and the personal gratification that comes from harvesting one's own foods from the wild by it.

Petition 2023-24 proposal to expand the spatial extent of the prohibition of public access for fishing off the City of Laguna Beach.

Deny (in concurrence with the CDFW recommendation and rationale)

The Department found that the proposal does not "address a current or emerging MPA management challenge or align with the original intent of these MPAs as established during the MLPA Initiative planning process." They found that the proposed action would not further the proposer's stated objectives within their petition – ease of enforcement, kelp protection, whale entanglement risk.

We concur. We also note that the proposer's purpose appeared contrary to providing equitable access to a public trust resource for underserved communities (fishing within the state's submerged lands).

Rather, the intent appears to be an effort to further the relative exclusion of the public from the shorelines and coastal waters offshore of the economically exclusive community of Laguna Beach.

Our fleet out of Dana Point Harbor regularly takes the public to fish in the waters proposed for closure, a 1.3-mile stretch of some of the most scenic coastline in the state. The loss of access to fish these waters would halve the beautiful near-coastal fishing area north of Dana Point Harbor, where rocky headlands and deep secluded coves predominate.

A roughly 2.5-mile stretch immediately up-coast of the Dana Point Harbor, it is precisely these coves and headlands where the charter fleet out of Dana Wharf Sportfishing and Whale Watching takes organized groups of underserved youth, disabled veterans and others that are on limited time schedules or mobility challenged to experience recreational fishing in beautiful and inspiring surroundings.

Petition2023-27MPA-AM1 – new restrictions on anchoring within the existing Anacapa Island SMR/SMCA complex.

Deny (in concurrence with the CDFW recommendation and rationale)

There is little evidence that the current allowance of anchoring in these waters is having an enduring negative impact on seagrass beds in this area. Seagrass in the area is predominantly Zostera Marina, a resilient flowering plant that propagates predominantly through sub-benthic rhyzomes lying buried beneath the seafloor in soft bottom substrates.

Its appearance and density above the bottom varies seasonally and season to season. Primary influences on its abundance are lighting (water clarity and depth), appropriate substrate,

surge and current strength. The impact of anchoring, should it happen to be within an area colonized by Zostera, is minimal and temporary. Current levels of anchoring in the area are relatively low and sea grass beds disturbed quickly recover.

Members or our fleet do fish within this SMCA and appreciate the access to coastal pelagic species there. Anchoring is part of that activity and this proposal leaves open the potential for an anchoring prohibition that would adversely impact that fishing opportunity for the public.

Petition 2023-33MPA

This petition proposes the following MPA expansions and new MPAs

i. Cabrillo SMR - expand westward and northward by 15.2 sq mi ~9.9 sq mi

ii. Point Dume SMCA - expand westward by 4.6 sq mi

iii. South Point SMR - expand westward by 26.3 sq mi

iv. Gull Island SMR - expand northward by 1.8 sq mi

v. Point Conception SMR - expand eastward by 14.6 sq mi

vi. Natural Bridges SMR - expand southward by 13.7 sq mi, eastward to the edge of Natural Bridges State Beach by ~14.5 sq mi

vii. Pleasure Point, Santa Cruz - designate 3.2 sq mi as a new State Marine Reserve Conservation Area

Deny (in concurrence with the CDFW recommendation and rationale)

This petition is a bold "land grab" which proposes to turn vast areas of prime, valued rocky reef habitat, especially in waters of less than 100 meters, into marine parks that ban fishing. This habitat type is already over-represented within our MPA network as compared to its natural occurrence in state waters. These proposed actions are completely out of line with the guidance provided for adaptive management measures to be considered by the Commission, which offered that this would not be MLPA-2.

To date our award winning MPA network has shown that a larger biomass-per-area of the species that fisheries target has developed within our MPAs. This state-wide result is driven by differences observed in the southern regions.

What has not been observed within the scientific monitoring effort was a difference in fish diversity, or ecosystem resistance to change (due to the recent marine heat wave). While these kinds of benefits have been observed globally that they were not here indicates two things.

The first is if there are differences in ecosystem resilience or species diversity between waters inside and outside of MPAs in California, the scale of the difference is likely to be small.

The second is quite revealing and illuminates that the existing robust fisheries management and environmental protections are already protecting biodiversity and ecosystem resilience at a very high level statewide. What's missing is only robust protections from future industrialization. However, this is something that is provided for within the National Marine Sanctuary waters.

The petitioners proposed actions would exclude fishing from vast areas of rocky bottom habitat in waters less than 100 meters. It is precisely this habitat type that our captains most depend on to provide successful fishing for our customers.

While the proposed actions are state-wide in nature, they disproportionately cost public access from Santa Barbara and Santa Cruz harbors. In areas closed to fishing the lost fishing access has so far not been compensated for by additional public participation based on an area being closed to fishing. Fishing participation transcends physical ability, socioeconomic strata, educational levels, cultural backgrounds, creeds and colors in ways SCUBA diving and underwater photography participation commonly does not.

Petition 2023-34MPA

Reclassify Point Buchon SMCA to an SMR and Limit Allowable Uses at Farnsworth Onshore and Offshore SMCAs to Recreational Spearfishing

Deny (in concurrence with the CDFW recommendation and rationale)

Within their analysis the Department notes the extensive deliberations by the various stakeholders during the 2-year Southern Region MLPAI Regional Stakeholder Group process. The take allowances at the Farnsworth MPA cluster were carefully considered and vetted, resulting in the current configuration and take allowances.

These take allowances provide important public access to mobile species which largely do not benefit from spatially based protections. At the same time the cluster provides spatially based protections for demersal, sessile and resident species including Stylaster hydrocoral, at scale.

The Farnsworth Bank is very important to our Santa Monica Bay, Los Angeles, Long Beach, Newport Bay and Dana Point Harbor based partyboats' access to target squid, bonito, yellowtail, white sea bass and other species. The regionally famous "Farnsworth mossback yellows" are fish of legend – difficult to land once hooked but a true prize and badge of honor if successful.

The Department's analysis of these proposed actions (2023-34MPA_2 & 2023-34_3) provide "...further reductions to the fishing grounds and restricting take to spearfishing only would impose socioeconomic costs without clear ecological benefit. From an MPA Network design perspective, the Farnsworth SMCAs fulfill their intended role as partial-take MPAs with a High LOP..."

The Farnsworth is a site where avid anglers desire to fish big-game -- where the challenge is elevated but so is the potential reward.

Petition 2023-29MPA, and absent CDFW recommendations,

DENY (based on the following)

Petitioners propose the establishment of a new State Marine Conservation Area off the coast of Carpinteria. This proposal is redundant, scientifically unsupported, reduces public access to all but the documented members of the Federally recognized Santa Ynez Band of Chumash. It creates an undue burden on a region already heavily impacted MPA fisheries closures.

Tribal Stewardship and Co-Management

We continue to support California's commitment to tribal sovereignty and co-management of native resources. However, we emphasize that tribal stewardship does not require the creation of new MPAs.
Tribal stewardship is currently a component of the MPA framework under the MLPA Master Plan. There are four MPA's allowing the Santa Ynez Band of Chumash exclusive fishing access at Anacapa SMCA, Naples Reef SMCA, Point Dume SMCA, and Kashtayit SMCA. Tribal exemptions allow traditional and ceremonial take. These examples demonstrate that the state can honor its commitment to tribal sovereignty and Traditional Ecological Knowledge (TEK) by modifying current regulations without closing additional area to public access for fishing. This was most recently done at the August 22, 2018 FGC meeting.

The Santa Ynez Band of Chumash previously submitted a petition for Tribal Take within several existing MPA's. In 2018, after a full analysis, the FGC approved their petition. (FGC Decision Document 08-22-2018) The new petition 2023-29MPA is exclusionary in nature. The area they propose is currently open and accessible to the public and all tribal members regardless of federal recognition. If implemented this new closure would exclude access for all others, including descendants of local Chumash who also have ancestral ties to these waters but are not registered members of the Santa Ynez Band. True collaborative co-management should be explored across California's entire MPA network to ensure equitable access for all tribal members. We encourage you to prioritize collaborative management at these existing sites. Additional closures which eliminate access for non-federally recognized tribes and the public are not needed, nor appropriate.

Scientific Rationale for Denial

The scientific justifications provided in the petition are fundamentally flawed:
Connectivity: The petition argues for a new MPA to fill a gap in the network. However, official measurements show the spacing between existing MPAs at Campus Point and Point Dume is 60.60 miles, which falls within the state's recommended 31–62 mile spacing guideline, making a new designation unnecessary.

Species-Specific Protection: The petition focuses heavily on protecting juvenile white shark nurseries. The Fish and Game Commission established clear precedent in 2020 when it denied a nearly identical petition for this exact location, stating that MPAs are intended to protect entire ecosystems, not individual, highly mobile species like sharks.

The petitioner proposes allowing shore-based finfish take, which reduces the area's Level of Protection to moderate-low. Under the MLPAI SAT guidance this LOP would not support MPA connectivity goal.

Disproportionate Regional Impact

The Santa Barbara Channel is already one of the most protected regions in California With 19 MPA's. Currently, 21% of Channel Islands National Marine Sanctuary waters in this area are protected, significantly exceeding the state average of 16%. Furthermore, 96.41% of the Channel Islands MPA network is designated as no-take, compared to a 60% average for the

rest of the state. Closing Carpinteria would further marginalize local recreational fishermen who have already seen their traditional grounds significantly reduced.

Carpinteria Reef, the reef that would be almost entirely inside the proposed MPA, is one of relatively few reef areas close to harbor for fishing. Approving this petition will be the end of local fishing access to coastal reefs. It will totally exclude opportunity for those who cannot afford or safely travel across to the Channel Islands such as skiffs, kayak fishermen and freedivers. The reefs in the protected waters of the proposed MPA are where charter boats take first timers, trips with special needs children, and our wounded warriors due to close proximity to the harbor, generally protected area from weather, and the variety of fish habitat in this zone. There is also an overwhelming amount of public outcry on this petition due to a lack of meaningful local outreach. The Carpinteria reef area is vital to the local community, economy, local charter businesses, and tourism. Closing this area to fishing would ignore carefully negotiated outcome for this region during the MLPAI process. It would greatly reduce access for all non-Santa Ynez Band Chumash tribal people as well as create regulatory conflicts in the planned decommissioning of oil infrastructure in the area. We respectfully urge you to deny Petition 2023-29MPA---

In conclusion, we applaud the efforts of the scientists, regulators and staff from CDFW and the CFGC for their extraordinary effort to review and communicate with the community on this important topic. We strongly feel working together we can continue to strengthen the network through research, monitoring and targeting water quality issues.

Sincerely,

Ken Franke
President

From: Jaime Diamond <info@stardustsportfishing.com>
Sent: Monday, March 30, 2026 8:19 PM
To: FGC <FGC@fgc.ca.gov>
Subject: 4.14.26 Tribal Subcommittee MPA Bin 2 Tribal Petitions Agenda 4E

Please confirm receipt of this email and attachment.

--

Jaime Diamond

March 28, 2026

To: California Fish and Game Commission Tribal Subcommittee

From: Stardust Sportfishing and Santa Barbara Landing

Subject: Bin 2 Petition Analysis

Dear Commissioner Hostler-Carmesin,

Stardust Sportfishing and Santa Barbara Landing offers sportfishing trips, whale watching, guided Channel Islands kayaking and SCUBA adventures, SCUBA instruction, kayak & jet ski rentals, fishing clinics, and a bait and tackle store located in the Santa Barbara Harbor. We are the main provider of ocean access (both consumptive and non-consumptive) to the public from Santa Barbara. Stardust Sportfishing is owned by husband and wife team Captain Jason and Jaime Diamond. We are board members of The Sportfishing Association of California, and Jaime serves as Regional Vice President of SAC. In 2024 Capt. Jason and our son Matthew Diamond entered the commercial spiny lobster fishery.

The MPA network was developed after an extensive and traumatic process, Captain Jason was part of the regional stakeholder group for the Santa Barbara area. Recreational anglers and charter operators had to adapt to the loss of access to approximately fifty percent of our traditional fishing areas. Unfortunately, some were not able to and went out of business.

Today, we have adapted to the framework, trust has been built as recreational anglers and vessels from the CPFV sector including our vessels Stardust & Coral Sea, have been involved in the study of the MPA network. We believed what we were told, it would never happen again, that was it. Unfortunately, now, we find ourselves far down the path of MPA 2.0, despite a list of 27 adaptive management recommendations from the MPA Decadal Management Review, which would or could have offered meaningful change to improve and strengthen the network vs blanket expansions. The sportfishing industry did not submit petitions to remove any MPA's, because we respect the work that has been done, and the protections as they are.

We applaud the CDFW analyses of the non-tribal bin 2 2023 MPA petitions submitted in response to the Decadal Management Review recognizing the adaptive management component of the Marine Life Protection Act.

In 2023 the "draft evaluation framework (Draft Framework) was developed for the 15 Bin 2 Petitions that propose changes to the Marine Protected Area (MPA) Network that

were received by the California Fish and Game Commission (CFGC) and referred to the California Department of Fish and Wildlife (CDFW) in 2023. CDFW developed the Draft Framework, with support from staff at the CFGC and Ocean Protection Council (OPC), based on the adaptive management process outlined in chapter 4 of the 2016 Master Plan for MPAs. The 2016 Master Plan directs CDFW and CFGC to use the Marine Life Protection Act (MLPA) goals and mandates, MPA objectives, and design considerations as the primary basis for any action taken to make changes to the MPA Network. The Draft Framework also draws from the Decadal Management Review (DMR) and recommendations, and the MPA Regulation Change Petition Framework approved by CFGC at their August 2023 meeting, which is rooted in the DMR recommendation cornerstones of MPA Governance, MPA Management Program Activities, and MPA Network Performance." (Evaluation Framework for 2023 Marine Protected Area Bin 2 Petitions at https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=232901&inline).

We support the Department's work product and recommendations and believe the Department has exhaustively researched and cited the components of the MLPAI process which illuminate the choices and considerations to guide their analyses and recommendations.

We offer our recommendation to the tribal subcommittee for 1 tribal petition that would have a detrimental impact on our own business and the broader sportfishing community. We review the implications of the proposed actions with the greatest potential impact on our ability to provide public access to the state's rich and sustainably managed marine resources, our continued economic vitality, and the overall continued sustainable management of our fisheries.

Petition 2023-29MPA, and absent CDFW recommendations,

DENY based on the following:

Petitioners propose the establishment of a new State Marine Conservation Area off the coast of Carpinteria. This proposal is redundant, scientifically unsupported, reduces public access to all but the documented members of the Federally recognized Santa Ynez Band of Chumash. It creates an undue burden on a region already heavily impacted MPA fisheries closures.

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Carpinteria Reef, the reef that would be almost entirely inside the proposed MPA, is one of relatively few reef areas close to harbor for fishing. Approving this petition will be the end of local fishing access to coastal reefs. It will totally exclude opportunity for those who cannot afford or safely travel across to the Channel Islands such as skiffs, kayak fishermen and freedivers. The reefs in the protected waters of the proposed MPA are where our charter boats take first timers, trips with special needs children, and our wounded warriors due to close proximity to the harbor, generally protected area from weather, and the variety of fish habitat in this zone. Kayak and skiff fishermen, both rod & reel and spearfishermen and lobster hunters frequent this area for similar reasons. Commercial fishermen, fishing for fin fish and invertebrates, utilize this important area for similar reasons as recreational anglers.

There is also an overwhelming amount of public outcry on this petition due to a lack of meaningful local outreach by the petitioners. The Carpinteria reef area is vital to the local community, economy, local charter businesses, commercial fishermen and tourism. Closing this area to fishing would ignore a carefully negotiated outcome for this region during the MLPAI process. It would greatly reduce access for all non-Santa Ynez Band Chumash tribal people as well as create regulatory conflicts in the planned decommissioning of oil infrastructure in the area. We respectfully urge you to deny Petition 2023-29MPA---

In conclusion, we applaud the efforts of the scientists, regulators and staff from CDFW and the CFGC for their extraordinary effort to review and communicate with the community on this important topic. We strongly feel working together we can continue to strengthen the network through research, monitoring and targeting water quality issues.

Sincerely,

Jaime Diamond

Jaime Diamond
Stardust Sportfishing, Owner
Santa Barbara Landing, CEO/GM

Jason Diamond

Captain Jason Diamond
Stardust Sportfishing, Owner/Operator
Santa Barbara Landing, Partner
Commercial Lobster Fisherman

Matthew Diamond

Matthew Diamond
Commercial Lobster Fisherman

Barbareño Band of Chumash Indians

kiykił ’i ka šiš-kuhk’ú’ hi ’it’il šup o kiy-a nu’na

TRIBAL COUNCIL CHAIR

Eleanor Fishburn

TRIBAL COUNCIL OFFICERS

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Secretary

Barbara Lopez (Interim)
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Eleanor Fishburn
Barbara Lopez
Patricia Morello
Regina Gradias
Darlene Hernandez (Interim)

CONTACT

Barbareño Band of
Chumash Indians
P.O. Box 60141
Santa Barbara
CA 93160

bb.chumash.indians@gmail.com
www.bbc-indians.com

Tax ID: 81-2012164

March 24, 2026

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

Re: Support for Petition 2023-29MPA

Dear President Zavaleta and Honorable Commissioners,

The BBCI strongly supports Petition 2023-29MPA of establishing a State Marine Conservation Area in the city of Carpinteria. Within the SMCA’s boundaries is the ancestral Chumash village mišopšno. The village was of significant value to the indigenous Chumash. Today, we are obligated to preserve, restore, and protect all of our ancestral lands and waters.

The Mishopshno SMCA would be a practical and collaborative effort to not only protect, but to bring awareness of the history in the area. The area is where our ancestors travel through, gather and hunted from, and cared for long before the Spanish arrived. Specifically, the village of mišopšno was where tomols (Chumash canoes) were built and then launched from the coastline.

Our local tribal community members have noticed a significant loss in marine life across their ancestral coastlines every decade; leaving themselves to question… “Why?”, instead of having an answer for the younger generations. A Tribal MPA would further incentivize the Chumash community to be more involved or interested in the restoration of one of the many areas their ancestors relied on for thousands of years.

Establishing a Tribal MPA would instate qualified Chumash descendants (and tribal representatives) as stewards of the land, allowing them to follow in the footsteps of their ancestors. It would also fulfill federal commitments of supporting Tribal MPA, while holding merit for future tribal and state collaborations.

The Barbareño Band of Chumash Indians urges the commission to approve Petition 2023-29MPA to protect an area of great importance to Chumash people while fulfilling federal tribal co-management initiatives. Thank you for your continued work to safeguard our oceans and the opportunity for our concerns to be heard.

Best regards,

Eleanor Fishburn

Eleanor Fishburn, Chairperson
Barbareño Band of Chumash Indians

From: Valentina Scaife <[redacted]>

Sent: Thursday, April 16, 2026 12:44 PM

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

Subject: In Support of the Mishopshno SCMA (Petition 2023-29MPA)

President Sklar and Honorable Commissioners,

Dear President Sklar and Honorable Commissioners,

I am a California resident writing in strong support of the Mishopshno State Marine Conservation Area (SMCA) (Petition 2023-29MPA) off the coast of Carpinteria.

The Mishopshno SMCA would protect important habitats that support rich biodiversity, such as kelp forest, rocky reef, sandy beaches, and a vital juvenile white shark habitat. Furthermore, I strongly support Mishopshno's tribal co-management by the Santa Ynez Band of Chumash Indians as a concrete step towards Indigenous marine stewardship. The designation of this MPA would honor the Chumash peoples' historical and present-day relationship with the Santa Barbara coast, and strengthen their stewardship of the area.

Research has shown that marine protected areas (MPAs) can bolster ecosystem resilience in the face of climate change, enhance local economies through tourism and ocean recreation, help overexploited fish and habitats bounce back, and keep our coasts healthier. The establishment of Mishopshno SMCA would also be a powerful step toward Governor Gavin Newsom's 30x30 goal, protecting California's marine life and coastal communities for generations to come.

We appreciate the Commission's work to protect our state's coastal habitats and biodiversity, which is critical now more than ever as we face the twin crises of climate change and biodiversity loss. I urge you to approve this proposal that aims to honor Chumash cultural and historical connections to the area, provide additional resilience in the face of climate change, and protect critical marine habitats.

Sincerely,

Valentina Scaife

[redacted]

[redacted]

Carlsbad, California [redacted]

From: kathy mayer <r>
Sent: Saturday, April 18, 2026 02:52 PM
To: FGC <FGC@fgc.ca.gov>
Subject: Letter to Commissioners_May 5_Regional Marine Protected Area (MPA) Petitions (alongshore San Luis Obispo through SantaBarbara Counties Petitions

Dear Commissioners,

I recently attended the Tribal committee meeting, heard the presentations and wanted to provide public comment.

Please see attached.

Thank You,

Respectfully submitted,

A concerned Carpinteria Local

To: fgc@fgc.ca.gov

Reference:

May 5_Regional Marine Protected Area (MPA) Petitions (alongshore San Luis Obispo through SantaBarbara Counties Petitions

Meeting Date: 5/5/26

SYBCI MPA Petitions

2023-19MPA

2023-20MPA

2023-21MPA

2023-28MPA_AM1

2023-29MPA_AM1

Letter to F&G Commission

Dear Commissioners,

I recently attended the Tribal committee meeting, heard the presentations and wanted to provide public comment:

Questions/comments?

1. Why do we need to have SYBCI specific MPAs?

- If memory serves, the MPLA process was open to all stakeholders (I attended meetings in Santa Barbara) and went thru an extensive Blue ribbon Task force review process.

2. Are the SYBCI not allowed to participate in ocean related activities in the proposed MPA's that are currently available to the general public?

3. Couldn't resource utilization_"ceremonial exceptions"&""take exceptions" be addressed in the existing F&G regulations without having to create a special MPA?

4. Are land based activities the purview of the MLPA process or other entities such as State Parks, BLM, National Parks, National forest, etc?

- I ask because I have attended a few Chumash ceremonies at the Carpinteria State park

5. Why would we want to further eliminate and/or limit access to more habitat to the general public? Especially our youth.

6. Will fisheries management, rules and regulations be based on “best available science” or “TK” aka Traditional knowledge or a combination of both?

7. If management practices are to be guided by “TK,” what/who will be the Peer review process?

8. With respect to Mishopsho SMCA;

- The Carpinteria Reef area and the Naples MLPA were the result of considerable discussion/negotiation during the MLPA process many years ago. Unfortunately many of those stakeholders have passed but there are a few of us who remember going thru the extensive process. I don't remember the reason but if memory serves it was decided to create the Naples MLPA and not make Carpinteria Reef and surrounding area an MPA. Now it seems like the SYCI are essentially asking us to forget that agreement.

9. Hopefully the end of this process will be inclusive and equitable to the unassociated user community and other stakeholders

2023-29MPA_AM1 Mishopsho Comments:

- My family was born in Carpinteria and we've raised our children fishing and diving on the local beaches and reefs and we have

attended several Chumash ceremonies at the Carpinteria State Park.

- The State park region and Carpinteria reef region has been an integral part of our lives and continued access of this highly utilized resource is very important to the Carpinteria community, in particular the youth.

- Locals access the shoreline to participate in traditional use activities such as fishing (fly

fishing, catch and release, etc) and diving related activities such spearfishing and the gathering of lobster/clams/mussels,etc.

- This region is of particular importance to the local youth community since it is one of the few areas accessible by foot and/or bike.

- It is a very common occurrence to see local youth ride their bikes to the local spots to participate in shore based activities

(surf, fish and dive) and for those with kayaks to paddle out to fish and dive on Carpinteria Reef.

- Activities include but are not limited to surfing, fishing(no motor-youth tournaments), diving, swimming (junior life guard competitions), kayaking, paddle boarding, small boat launching , etc.

- **In this day and age with all that has happened/what we have learned with Covid and shuttering of ourselves and our**

youth, why in the world would we want to do anything to limit access to getting outdoors and participating in good, clean fun, especially for our youth.

A Concerned Carpinteria Local

20 April 2026

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

Submitted electronically to fgc@fgc.ca.gov

Re: Proposed Changes to California's Marine Protected Area Network

Dear President Sklar and Honorable Commissioners,

We respectfully submit this letter for consideration in the decision making process for the petitions submitted in response to the adaptive management process following the Decadal Review of the California Marine Protected Area (MPA) Network. As marine scientists at the University of California, we are writing to highlight the myriad demonstrated benefits of MPAs documented in the scientific literature that we are confident support maintaining the existing MPA network and provide evidence for the value of expanding protections in California's marine and coastal areas.

MPAs Offer Diverse, Proven Benefits to California's Coast and Ocean

One of the primary benefits of MPAs is **fisheries spillover.** This has been documented in many other ecological contexts (Lynham & Villaseñor-Derbez 2024, Di Lorenzo et al. 2020), but specifically in California has been observed as **a boon to the California commercial and recreational spiny lobster fisheries** (Lenihan et al. 2021, Kay et al. 2012). The recreational fishery has been valued at $40 million (CDFW 2016) and the commercial fishery is among the top commercial fisheries by ex-vessel value in the state (CDFW 2021). Research has demonstrated that in Southern California, a 35% reduction in fishing area resulting from MPA designation was compensated for by a 225% increase in total lobster catch after 6-years, thus indicating at a local scale that the trade-off of fishing ground for no-fishing zones benefitted the fishery (Lenihan et al. 2021). Analysis of SCUBA diving charter boat data in the Northern Channel Islands demonstrated the significant preference of recreational lobster hunting for the border zones of MPAs (Morse et al. 2024).

Beyond fisheries, there are myriad non-extractive benefits of MPAs in California. The first is **biodiversity and ecosystem health**. To reiterate the findings of science conducted as part of the Decadal Review, Smith et al. (2025) concluded that **MPAs increased fish biomass across the whole California MPA network.** Older MPAs, and those with a greater diversity of habitats, showed the highest amount of fish biomass, especially in fishery-targeted species, like rockfishes. This suggests that the protection from fishing really does help boost these populations' health (Spiecker et al. 2025). Stronger protections also correlated with more pronounced results: MPAs with more stringent protections saw greater gains, as did areas that had previously experienced heavy fishing. Older and larger MPAs also produced more significant results (Ziegler et al. 2024).

Although older MPAs generally realize greater biodiversity benefits, Caselle et al. (2015) evaluated the impacts of the Northern Channel Islands MPAs in the 10 years after their designation in 2003. Here, **biomass of targeted fish species increased significantly inside all MPAs, with a rate approximately four times faster than outside MPAs**.

MPAs provide significant benefits to **recreation and California's marine ecotourism industry.** Marine and coastal ecotourism is one of the largest sectors in the ocean economy, accounting for 50% of all global tourism. In California, marine and coastal tourism contributes approximately $26 billion in GDP per year (NOAA 2018). Research from our lab analyzed millions of data points on where SCUBA diving charter boats put divers in the water in the Northern Channel Islands and found that these **SCUBA charters significantly prefer visiting MPA dive sites over non-MPA dive sites** (Morse et al. 2024). Dive vessels engaged in ecotourism activities (e.g., wildlife viewing, underwater photography) prefer areas protected inside MPAs, and dive vessels primarily taking clients recreational lobster hunting prefer MPA border zones where the spillover effect is occurring (Lenihan et al. 2021). When asked about their reasons for targeting the MPAs, boat captains cited higher abundance of big fish and marine megafauna like giant sea bass and sheephead, and the health of the kelp forests in these areas.

MPAs offer **ecosystem resilience to environmental perturbations such as ocean warming and marine heat waves.** By removing one source of stress in fishing, this allows ecosystems to have a healthier baseline and increase their likelihood of withstanding or recovering quickly from extreme conditions. Fully protected MPAs significantly enhance kelp forests' resistance to and recovery from marine heatwaves, particularly in Southern California (Kumagai et al. 2024). In this region specifically, this is likely driven by the high densities of urchin predators (lobster and sheephead) inside fully protected MPAs, which keep urchins in check and prevent excessive kelp predation (Caselle et al. 2015). Additionally, Ortiz-Villa et al. (2025) found that California MPA implementation led to a 8.5% increase in kelp coverage compared to reference areas.

MPAs – particularly larger MPAs or well-connected networks of MPAs – can also provide **population resilience by enhancing genetic diversity.** Because fecundity increases with maternal age and size, protecting older, larger individuals in a given population within MPAs contributes to increased overall reproductive output and ensures the necessary supply of recruits to maintain healthy population sizes and genetic diversity (Koeck et al. 2024). Larger population sizes with a broader age distribution, as commonly found in fully and highly protected MPAs, may speed up recovery following disturbance through maintenance of greater demographic and genetic diversity and reproductive output and juvenile recruitment (Baskett & Barnett 2015).

Taken individually, we believe that these benefits of MPAs make a strong case for the value of maintaining the existing network and taking advantage of opportunities to establish new ones. Particularly in the face of climate change, pollution, and coastal development, the combined positive benefits of MPAs will position California's invaluable coastal and marine areas to achieve the resilience necessary to weather these now inevitable stressors.

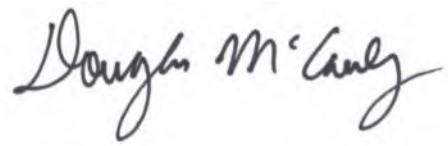
We Support the Mishopshno SMCA and Point Sal SMCA Petitions

We would like to conclude this letter with an endorsement of two of our local petitions: Mishopshno SMCA and Point Sal SMCA. The Mishopshno SMCA would help advance California's Tribal Marine Stewardship goals, increase overall MPA network connectivity, add habitat replicates to the South Coast MPAs, and create a conservation corridor for coastal wildlife that spans from land to sea. Specifically, our lab's research has demonstrated that the proposed area is an important habitat for the North Pacific population of white sharks, and that juvenile white sharks have site loyalty to Carpinteria and specific habitat needs that are present in the Carpinteria waters (McCauley et al. 2024).

The Point Sal SMCA would protect important marine life and habitats, advance the state's goals toward Tribal co-stewardship of California's coastal waters, create an area where both land and sea are conserved, and support local and network-wide resilience to the impacts of climate change and growing ocean threats into the future. As California's coastal waters face the mounting pressures of increased warming and coastal development, a new MPA at Point Sal would protect habitats in the region that are less exposed to local stressors than the closest nearby MPAs (Vandenberg SMR and Point Buchon SMR/SMCA), strengthening the state's MPA network by adding a critical replicate site—an ecological safeguard or "insurance policy"—that enhances resilience and reduces risk across California's broader MPA system.

We thank you for your work to thoughtfully consider the adaptive management of California's MPA Network and appreciate your consideration of the evidence contained in this letter for strengthening the Network.

Sincerely,



Douglas McCauley, PhD
Professor, Ecology, Evolution and Marine Biology
Director, Benioff Ocean Science Laboratory
UC Santa Barbara

Molly Morse, MS
Senior Manager, Benioff Ocean Science Laboratory
UC Santa Barbara

The viewpoints expressed in the preceding letter represent our personal perspectives and do not represent the viewpoints of the UCSB Marine Science Institute, UC Santa Barbara, or the University of California system.

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From: BILL WOODBRIDGE <[redacted]>
Sent: Tuesday, April 21, 2026 03:00 PM
To: FGC <FGC@fgc.ca.gov>
Subject: Approve the Mishopshno SMCA MPA in Carpenteria

Designating the Mishopshno SMCA would protect essential habitats including sandy beaches, rocky reefs, and persistent kelp forests which provide shelter and food for countless sea life. This is one of the state"s last remaining persistent kelp forests which are disappearing at an alarming rate due to purple sea urchins and other causes. This designation would also strengthen and honor the Chumash peoples' stewardship of the area and elevate their historical and present-day connection to the region. Most importantly, there is a seal rookery on the beach in this area.

Thank you for your consideration and support.

Bill Woodridge
Santa Barbara

Ventura County Commercial Fishermen's Association
1237 S. Victoria Ave #284
Oxnard, CA 93035
(805) 663-2152
venturacountyfishermen@gmail.com

21st April, 2026

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

Subject: **Opposition to Petition 2023-29MPA**

Dear California Fish and Game Commission,

My name is Dave Colker, and I serve as the Executive Director of the Ventura County Commercial Fishermen's Association (VCCFA). Through my role with VCCFA, I represent a growing network of commercial fishermen, industry partners, and stakeholders who are directly connected to and dependent upon access to California's coastal resources.

Our association has been actively engaged throughout the Marine Protected Area (MPA) petition process, carefully reviewing proposals, participating in meetings, and working to ensure that the voices of the commercial fishing community are heard and considered. We are committed to responsible ocean stewardship, sustainable fisheries, and collaborative management approaches that are grounded in sound science, practical application, and a full understanding of both ecological and socioeconomic impacts.

On behalf of the Ventura County Commercial Fishermen's Association (VCCFA), I respectfully submit comments regarding Petition 2023-29MPA.

While we acknowledge the intent of marine resource protection within this petition, we have significant concerns regarding the **lack of comprehensive socioeconomic analysis** and the absence of a meaningful evaluation of **effort displacement and its impacts on surrounding open fishing areas**.

The petition suggests that economic impacts would be limited; however, this conclusion appears to be based primarily on reported landings within the proposed closure area rather than a full understanding of how fisheries function in practice. On paper, a closure may represent a small percentage of total landings, but in reality, these areas often serve as critical components of a fisherman's operational range—used seasonally, strategically, or as fallback grounds when conditions change.

When access to an area is removed, fishing effort does not disappear—it is **displaced**.

This displaced effort is then concentrated into remaining open areas, resulting in:

- Increased competition among fishermen
- Higher congestion in productive fishing zones
- Increased gear conflict
- Reduced efficiency and higher operating costs
- Greater localized pressure on marine resources in open areas

These impacts are not theoretical—they are well understood within the fishing community and represent real **socioeconomic consequences** that extend beyond the boundaries of the proposed MPA.

Despite this, the petition does not provide a substantive analysis of how fishing effort will redistribute or what the cumulative effects will be on open-access areas. This omission is critical. Without evaluating effort displacement, any conclusion regarding “minimal economic impact” is incomplete.

Additionally, the petition lacks a thorough economic impact assessment. There is little to no discussion of how this closure could affect:

- Commercial fishing businesses and their long-term viability
- Shoreside infrastructure such as processors, fuel docks, and suppliers
- Coastal communities that depend on commercial fisheries

Furthermore, any absence or limitation of recreational fishing data further contributes to an incomplete socioeconomic picture, as both commercial and recreational users contribute to pressure on open areas.

Marine Protected Areas do not exist in isolation—they function within a broader system. When closures expand without a full understanding of their external impacts, the burden is shifted onto the remaining open areas and the fishermen who rely on them.

For these reasons, VCCFA urges the Commission to carefully consider these deficiencies before moving forward with this petition. At a minimum, we recommend:

1. A comprehensive socioeconomic analysis that reflects real-world fishing behavior
2. A detailed evaluation of effort displacement and its impacts on open areas
3. A complete economic impact assessment that includes both direct and indirect effects
4. Inclusion of all relevant data, including recreational fishing impacts

We appreciate the Commission’s efforts in reviewing these petitions and respectfully request that these critical gaps be addressed to ensure balanced and informed decision-making.

Thank you for your time and consideration.

Respectfully submitted,

Dave Colker
Executive Director

Dave Colker • Executive Director • venturacountyfishermen@gmail.com • 805-663-2152 • www.vccfa.org

Ventura County Commercial Fishermen's Association (VCCFA)

Dave Colker • Executive Director • venturacountyfishermen@gmail.com • 805-663-2152 • www.vccfa.org

From: Merit McCrea <[redacted]>
Sent: Wednesday, April 22, 2026 04:42 PM
To: FGC <FGC@fgc.ca.gov>
Subject: Public comment of Merit McCrea for the May 5th FGC meeting, on Petition 2023-29 Carpenteria

The Horseshoe Reef and Horseshoe Kelp are the two most important calico (kelp) and sand bass fishing spots between Santa Barbara and Ventura harbors.

Merit McCrea
[redacted]
[redacted] (UCSB, MSI)

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April 22, 2026

Eric Sklar, President
California Fish and Game Commission
715 P Street, 16th Floor
Sacramento, CA 95814

Re: <u>Support for the Designation of Mishopshno State Marine Conservation Area (Petition 2023-29MPA)</u>

Dear President Sklar and Honorable Commissioners:

The undersigned organizations submit this letter in strong support of the proposed Mishopshno State Marine Conservation Area (SMCA) in Carpinteria (Petition 2023-29MPA_AM1). Designating the Mishopshno SMCA would help advance California's Tribal Marine Stewardship goals, increase overall marine protected area (MPA) network connectivity, add habitat replicates to the South Coast MPAs, and create a conservation corridor for coastal wildlife that spans from land to sea. The Mishopshno SMCA would also enhance access to an

MPA for residents and visitors to California's South Coast.

In addition to our support for the petition, we specifically support the proposed co-management approach which offers the adaptive management process an opportunity to better include Tribes in MPA management decisions. Carpinteria holds deep cultural significance for the Chumash people, whose territory once spanned from Malibu to Paso Robles. Given the rich cultural ties that the traditional stewards of this land and waters have to this day, their displacement from these lands and waters, and their historic exclusion from portions of the MLPA Initiative, it is essential that Tribal leadership is recognized here. We also support regulations that allow hook and line fishing from shore for all Chumash people and others within the proposed SMCA boundaries.

The coastal waters offshore the Carpinteria area are ecologically rich and diverse and have features that are unique to the Central Coast. Carpinteria Reef supports one of the more abundant marine life communities and persistent kelp beds in Santa Barbara County. The Carpinteria Reef is also biologically linked to the Salt Marsh with a crucial exchange of nutrients and extensive interaction between marine and estuarine organisms. The Carpinteria Salt Marsh Reserve itself protects a critically important Southern California estuary and serves as an important regional nursery for halibut and other marine and estuarine fish. By adding protections to the waters adjacent to the salt marsh, the Mishopshno SMCA would bridge the land-sea divide, conserving a potential wildlife corridor, which is an objective Pathways to 30x30 California emphasizes. Finally, Carpinteria is also an important habitat for the North Pacific population of white sharks. Recent research has shown that juvenile white sharks (JWS) have site loyalty to Carpinteria and specific habitat needs that are present in the Carpinteria waters.

Padaro Beach, also located within the proposed SMCA boundaries, can be classified as an ideal JWS aggregation spot due to its sandy beach, rocky reef adjacent to an estuarine inlet, and low wave energy compared to many other available nursery habitats. White sharks are slow to reach reproductive maturity and produce only a small number of young each year, making them highly susceptible to the threats of fishing and other human activities. Designating an SMCA that restricts commercial and some recreational fishing in this location will reduce threats to this keystone species and help achieve California's goal of protecting the white shark population.

In addition to and because of its unique ecological attributes, Carpinteria Reef is recognized as one of the most popular recreational diving and kayaking destinations in Santa Barbara County, and provides an incredible opportunity for people to connect with and learn about the ocean and marine life. Extensive community outreach efforts also take place at both the Salt Marsh and the State Beach, including an on-site interpretative center, teaching amphitheater, and nature trail, as well as extensive ongoing research and educational activities like University courses, monthly bird surveys, habitat restoration and removal of invasive exotic plants, frequent local school visits, weekly docent tours, and field trips by the Santa Barbara Museum of Natural History. Protecting Carpinteria's waters alongside the salt marsh and beaches would provide a unique opportunity to highlight the benefits of broader land-sea conservation in education and outreach efforts, and serve as a living laboratory to study ecological dynamics of protected systems.

Adding the Mishopshno SMCA to California's MPA network would also help ensure that the overall MPA network remains a viable and useful tool for coastal ecosystem conservation. Currently, the closest coastal MPAs to the Santa Barbara region are Campus Point SMCA and Point Dume State Marine Reserve (SMR). Filling this 60-mile gap—which is one of the largest gaps in the MPA network—would help to enhance ecological connectivity for the network as a whole. Creating this MPA will protect critical kelp forest, sandy beach, and nearshore hard-bottom and soft-bottom substrates, increase representation of these habitats, while helping to reduce the spacing gap between protected areas. Furthermore, we believe this petition strongly aligns with the goals set by the California Marine Life Protection Act (MLPA) and the MPA adaptive management objectives described in the 2016 Master Plan.

Finally, it is important to note that this MPA proposal and its ensuing amendments were developed after extensive community outreach and feedback. The petition was amended in March 2025 to reflect the feedback of Tribal members, fishing interests, and other community groups. In the interest of addressing concerns from the commercial and CPFV fishing fleets, the proponents reduced the proposal's area by half from 18 square miles to 9 square miles. Additionally, the petition was amended to allow recreational fishing with hook and line from the shore to retain cultural and subsistence fishing access for Chumash people from non-federally recognized Chumash Bands and for non-Tribal recreational fishers. This proposal's amendments meet a difficult-to-achieve compromise between upholding science-based size and area criteria, protecting critical habitat and vulnerable species from harmful extractive activities, and being responsive to local commercial and recreational fishers.

Our organizations celebrate the success of the California MPA network and the Commission's continued work to protect our state's biodiversity at a time when ocean conservation is more necessary than ever to buffer against the impacts of climate change and intensive coastal and ocean use. Thank you for the opportunity to express our strong support for this proposal, which aims to create opportunities for Tribal co-management, protect iconic California habitats and wildlife, improve connectivity throughout the region, and promote greater ecological resilience in the face of climate change.

Sincerely,

Azul

California Coastal Protection Network

California Environmental Voters

California Marine Sanctuary Foundation

CleanEarth4Kids.org

Center for Biological Diversity

Defenders of Wildlife

Endangered Habitats League

Environment California Research and Policy Center

Environmental Center of San Diego

EPIC (Environmental Protection Information Center)

Fish On

Heal the Ocean

Hispanic Access Foundation

Latino Outdoors

LIFT Economy

National Ocean Protection Coalition

National Parks Conservation Association

Native Coast Action Network

Marine Conservation Institute

Monterey Waterkeeper

Morongo Basin Conservation Association

Ocean Defense Initiative

Patagonia

Point Blue Conservation Science

Reef Guardians

Salted Roots

Santa Barbara Channelkeeper

Santa Barbara County Action Network

SeaChange Scientific Consulting, LLC

Sierra Club California

Sierra Club Santa Bárbara-Ventura Chapter

Sierra Club Santa Lucia

Surfrider Foundation - Isla Vista Club

The Ocean Project

The Wilderness Society

Tolowa Dee-ni' Nation Natural Resources Dept.

Tuleyome

Turtle Island Restoration Network

Western Watersheds Project

WILDCOAST

Tracking Number: (_2023-19MPA_)

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)

Sam Cohen, Esq. Santa Ynez Band of Chumash Mission Indians
100 Via Juana Road
PO Box 517 Santa Ynez, California 93460
Telephone number:
Email address: scohen@chumash.gov

2. Rulemaking Authority (Required) - Authority cited: Sections 200, 205(c), 265, 399, 1590, 1591, 2860, 2861 and 6750, Fish and Game Code; and Sections 36725(a) and 36725(e), Public Resources Code.

3. Overview (Required) - This attached Summary for this Petition describes a proposed additional California-Chumash co-management SMCA that is referred to as "Chitqawi" – the northern most coastal Chumash village site of the territory traditionally inhabited by the diverse Chumash peoples. The proposed new regulations are as follows:

(B) Area restrictions defined in subsection 632(a)(1)(C) apply, with the following specified exceptions:
1. The recreational take of finfish [subsection 632(a)(2)], invertebrates except rock scallops and mussels by hand harvest is allowed.
2. Take pursuant to activities authorized under subsection 632(b)(97)(C) is allowed.
3. The following federally recognized tribe is exempt from the area and take regulations found in subsection 632(b)(97) of these regulations and shall comply with all other existing regulations and statutes: Santa Ynez Band of Chumash Indians.

4. Rationale (Required) - To ensure 30% of California waters are fully protected by 2030 and to foster Tribal engagement and co-management of MPAs, this Petition submitted by the Santa Ynez Band of Chumash Indians (SYBCI) recommends an additional MPA for the Central Coast Region MPA network. There is no Tribal MPA for co-management within this regional network.

The SYBCI are co-managers of four south coast SMCAs. The Tribe is recommending the adoption of a new MPA between Morro Bay and Cambria for the Central Coast Region.
Describe the problem and the reason for the proposed change: Click here to enter text.

SECTION II: Optional Information

5. Date of Petition: November 9, 2023

6. Category of Proposed Change

☐ Sport Fishing
☐ Commercial Fishing
☐ Hunting
☒ Other, please specify: MPAs, Section 632.

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): Westlaw regulations.
☐ 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: At the discretion of the Commission.

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

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: Unknown.

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

Please see attached.

SECTION 3: FGC Staff Only

Date received: 11/29/2023

FGC staff action:

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

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

SUMMARY INFORMATION FOR PETITION TO THE CALIFORNIA FISH AND GAME COMMISSION FOR REGULATORY CHANGE

A Petition to Add *Chitqawi* SMCA to the Central Coast MPA Network

Submitted By

Sam Cohen, Esq.
Government Affairs & Legal Specialist
Santa Ynez Band of Chumash Mission Indians
PO Box 517 | Santa Ynez, CA 93460
805.688.7997 Office

Date: November 11, 2023

Overview. California has begun its first 10-year review of the state's marine protected areas (MPAs) network. The State's first decadal management review of the MLPA will be used to inform the future of marine life protection in California waters.

Since the adoption of State MPAs, Governor Gavin Newsom laid out a goal to protect 30% of the land, water, and marine area over the decade. The current level of marine area designated in some type of MPA in each region is far less than the goal to protect 30% of California marine waters. Improvements to the existing MPA network are warranted. Changes to the existing MPA Network are based on the statutory authority of the Fish and Game Commission to take the action requested (Sections 200, 205(c), 265, 399, 1590, 1591, 2860, 2861 and 6750, Fish and Game Code; and Sections 36725(a) and 36725(e), Public Resources Code).

California should add marine area to the existing MPA Network for two primary reasons:

(i) To ensure the designed benefits of marine reserves an insurance factor[1] is needed to protect marine life and habitat from the synergistic impacts of anthropogenic disturbance events. Marine life is impacted by ecosystem disturbance associated with short term and long-term factors associated with climate disturbance, such as the warming of sea surface temperature, among other anthropogenic pressures. [2] An insurance factor, such as increasing the scale of MPA networks, may provide a protective measure to marine life impacted by anthropogenic impacts. Given the ten-year history of the benefits of MPAs within State waters, the Commission should consider adding other MPAs to the existing network given evidence of climate disturbance on marine life. For example, there is evidence of large areas of warming of sea surface temperature and associated ecosystem disturbance within the California Current.[3]

(ii) To strengthen the role of the Tribes in co-management and monitoring efforts and marine education activities throughout the marine region, additional Tribal MPAs are warranted today.[4] Additional Tribal MPAs should be designed within the existing MPA networks to ensure that Tribal nations are integrated and engaged in marine life protection and education efforts. Additional designation of Tribal MPAs is also

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[1] Allison, Gary W., Steven D. Gaines, Jane Lubchenco, And Hugh P. Possingham, Ensuring Persistence of Marine Reserves: Catastrophes Require Adopting an Insurance Factor, *Ecological Applications,* 13(1) Supplement (2003): S8–S24.

[2] Smith, J. G., Free, C. M., Lopazanski, C., Brun, J., Anderson, C. R., Carr, M. H., Claudet, J., Dugan, J. E., Eurich, J. G., Francis, T. B., Hamilton, S. L., Mouillot, D., Raimondi, P. T., Starr, R. M., Ziegler, S. L., Nickols, K. J., & Caselle, J. E. (2023). A marine protected area network does not confer community structure resilience to a marine heatwave across coastal ecosystems. *Global Change Biology*, 29, 5634–5651. https://doi.org/10.1111/gcb.16862

[3] Rodríguez-Rodríguez, D., and Javier Martínez-Vega. (2022) Ecological effectiveness of marine protected areas across the globe in the scientific literature. *Advances in Marine Biology* 92: 129-153 provide a detailed empirical review of the scientific literature on the ecological benefits of marine protected areas.

[4] McGinnis, M.V. and R. Cordero. *Tribal Marine Protected Areas: Protecting Maritime Ways and Tribal Practices*. A White Paper produced by the Wishtoyo Foundation. 2004.

warranted given recent California and federal guidelines and initiatives that support Tribal co-management and collaborative natural resource management and planning.

To ensure 30% of state waters are fully protected by 2030 and to foster Tribal engagement and co-management of MPAs, this Santa Ynez Band of Chumash Indian's (SYBCI) Petition emphasizes the need to designate an additional Tribal co-management SMCA for the Central Coast Region. This Petition recommends that the Central Coast Region MPA network (identified in the map below)[5] should be strengthened to support an additional Chumash SMCA. There is no such Tribal MPA for co-management within this regional network. This Petition includes a general characterization of the proposed new MPA including location and regulatory information for the Tribal co-management of *Chitqawi*[6] for the region.

Rationale. MPAs were established pursuant to the Marine Life Protection Act (MLPA) of 1999, and through a collaborative public process known as the MLPA Initiative process, which involved regional stakeholder groups such as commercial and recreational anglers, tribal and government representatives, educations, researchers, and conservationists. Environmental Impact Reports were prepared for each of the four study areas, including the Central Coast Region (Pigeon Point to Point Conception). The MPA network for the Central Coast Region was approved by the Commission in 2007.

California's first decadal management review of the MLPA began in 2022. One goal of the decadal management review is for the California Department of Fish and Wildlife (CDFW) to evaluate and adaptively manage the established MPA Network. The regional networks that were established by the State included input from participants in collaborative planning efforts

[5] The map is from California Central Coast Marine Protected Areas. Baseline Data Collection Summary Report. Publication No. T-068 (December 2008). California Sea Grant College Program University of California, San Diego. Page 2.

[6] For a discussion of Chitqawi and other central coast Chumash history, *see* Milliken, R. and John R. Johnson (March 2005). An Ethnogeography of Salinan and Northern Chumash Communities – 1769 to 1810. Available at: https://digitalcommons.csumb.edu/hornbeck_ind_1/4?utm_source=digitalcommons.csumb.edu%2Fhornbeck_ind_1%2F4&utm_medium=PDF&utm_campaign=PDFCoverPages

including members of the scientific community, conservationists, and marine resource users. Scientific input on the benefits of MPAs to marine ecosystems contributed to these early MPA planning processes.

There was very little effort by the State during the early period of the implementation of the MLPA to consider Tribal MPAs in the network design. There was also a general lack of agreement to establish MPA networks that would allow for ecological resilience of marine systems given the range of impacts and pressures associated with climate change, including the rise of sea surface temperature. Since the adoption of the MPA Network, there has been considerable evidence on the benefits of traditional ecological knowledge and other indigenous experience in marine life protection. There is also more information on the importance of marine reserves as management tools to support marine life protection in a context of climate change.[7]

The SYBCI are co-managers of four existing SMCAs. There exists no Tribal co-managed MPA within this network. Following adoption of MPAs in the North Coast MPA Planning Process, a regulatory provision was adopted by the California Department of Fish and Game Commission (hereafter "Commission") to provide exemptions from MPA-specific area and take regulations for individual federally recognized California Tribes (i.e., tribal exemptions), through a petition process by the Commission. Tribal take can be authorized in MPAs that overlap with areas of historic and/or current uses for gathering, ceremony, or harvest as reflected in a factual record of use provided by the Tribe. Amendments to MPA regulations were approved by the Commission for two different tribes: the Kashia Band of Pomo Indians (the Kashia) and the Santa Ynez Band of Chumash Indians (hereafter "SYBCI"). The SYBCI is the only federally recognized Chumash Tribe. The Chumash-California MPAs are Naples SMCA, *Kashtayit* SMCA, Point Dume SMCA, and Anacapa Island SMCA that provide Tribal exemptions.

The SYBCI is recommending the adoption of a new MPA between Morro Bay and Cambria for the Central Coast Region. This Petition refers to the additional California-Chumash co-management SMCA as "Chitqawi" – the northern most coastal Chumash village site of the territory traditionally inhabited by the diverse Chumash peoples. Chitqawi is a coastal village of the Chumash that exists on the northern boundary of the Morro Bay area (although the exact location is unknown). The proposed SMCA is named after the Chumash village. The Chumash word Chitqawi appears to have many different spellings.[8] An early reference to the village site was *Chotcagua*, which was probably a rancheria of 60 people encountered by the Portolá expedition at the north side of Morro Bay in the fall of 1769. A similar placename "Chotosilul," recorded for a young couple baptized at Mission San Luis Obispo by Father Lasuén in 1800, may be synonymous with Chotcagua.

The proposed general location of Chitqawi SMCA is depicted in the Map (attached to this letter). The SYBCI is proposing a general location; the specific location is identified below but the Tribe

[7] *Scientific Guidance for Evaluating California's Marine Protected Area Network*. A Report by the Ocean Protection Council Science Advisory Team Working Group and California Ocean Science Trust (June 2021).
[8] *See* Milliken, R., and John R. Johnson. An Ethnogeography of Salinan and Northern Chumash Communities – 1769 to 1810.

is willing to collaborate with State partners to consider this proposed SMCA in more detail given the state's interest in pursuing additional marine protective measures and pursuing offshore wind energy in the general area of Morro Bay.

There are many benefits to co-management of marine protected areas.[9] The benefits include:

- more appropriate rules and regulations that can respond rapidly to changing socio-ecological conditions.
- more effective and efficient enforcement due to increased legitimacy of the management structures.
- can increase equitable and fair use of resources; and
- can contribute to the empowerment and development of marginalized communities.

A general summary of the proposed new Chitqawi SMCA is as follows:

Location:

NW Corner:	
120° 55' 07.93184807" W	35° 24' 07.27987892" N
NE Corner:	
120° 52' 12.77783307" W	35° 24' 07.66583976" N
SE Corner:	
120° 52' 14.60088309" W	35° 21' 40.65821016" N
SW Corner:	
120° 55' 12.28543284" W	35° 21' 38.75344654" N

Primary habitat types: sandy beach, rocky intertidal, surfgrass, shallow hard and soft bottom, kelp bed. The Morro Bay estuary is a "nursery of the sea" because numerous animal species rely on estuaries for nesting and breeding. Most of the fish and shellfish eaten in the United States, including salmon, herring, and oysters, complete at least part of their life cycles in estuaries. Many of these species were essential to the maintenance of Chumash culture and maritime society. Additional protective measures that extend beyond the MPAs designated within the Morro Bay estuary are warranted, including a SMCA in the marine area to the north of the estuary and within State marine waters.

Regulations: The Chumash requested the Commission to apply tribal take provisions in four SMCAs in Southern California that are within their areas of historic and/or current tribal use. With the proposed new Chitqawi SMCA, the Chumash would be allowed to fish with the use of hand-based equipment. The proposed exemptions would be consistent with allowing tribal take exemptions as currently defined in Title 14, §632(a)(11), which identify how a member of a federally recognized tribe may be authorized to take living marine resources from an MPA with site-specific take restrictions. Members taking living marine resources under this provision are

[99] *Moving toward Co-Management of the Proposed Chumash Heritage National Marine Sanctuary*. A Paper Prepared for the Santa Ynez Band of Chumash Indians. Michael Vincent McGinnis. Bioregional Planning Associates. (March 2022). The paper includes a review of the literature and technical reports on co-management marine life protection.

subject to current seasonal, bag, possession, gear and size limits in existing Fish and Game Code statutes and regulations of the Commission, except otherwise provided for in Title 14, §632(b). No member, while taking living marine resources pursuant to this section, may be assisted by any person who does not possess a valid tribal identification card and is not properly licensed to take living marine resources. Nothing in the proposed regulation is intended to conflict with, or supersede, any state or federal law regarding the take of protected, threatened, or endangered species. The box below includes language for the new regulations associated with the proposed Chitqawi SMCA:

> (B) Area restrictions defined in subsection 632(a)(1)(C) apply, with the following specified exceptions:
> 1. The recreational take of finfish [subsection 632(a)(2)], invertebrates except rock scallops and mussels by hand harvest is allowed.
> 2. Take pursuant to activities authorized under subsection 632(b)(97)(C) is allowed.
> 3. The following federally recognized tribe is exempt from the area and take regulations found in subsection 632(b)(97) of these regulations and shall comply with all other existing regulations and statutes:
> Santa Ynez Band of Chumash Indians.

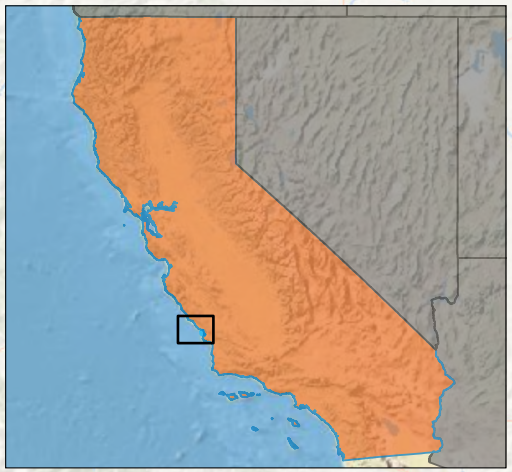
Examples of species likely to benefit nearshore rockfish, squid, mussels, turban snails, limpets, among other species, including California halibut. There are benefits to marine life, including sea birds, which depend on the Morro Bay estuary during part of their life cycle, since the estuary is a nursery to the sea. The new SMCA will also provide for protection of a diverse area containing shallow hard and soft habitats, sandy bottom, and associated fish and invertebrate species adjacent to an existing estuary (that is part of the National Estuary Program).

Detailed Objectives:

- Protect natural trophic structure and food webs, including forage species such as juvenile rockfish, squid, and coastal pelagic finfish that serve as prey for other fish, marine birds, and marine mammals.
- Protect larval sources and enhance reproductive capacity of nearshore fish and invertebrate species.
- Provide protection to nearshore shelf rockfish species.
- Replicate within a state marine reserve the range of shallow habitats found at Cambria and White Rock SMCAs.
- Include and replicate sandy beaches, shallow hard and soft bottom habitat.

The SYBCI appreciates the opportunity to recommend the adoption of this new co-management MPA within the Central Coast Region network. We would welcome the opportunity to discuss this proposal in more detail with State partners during the planning effort that is currently underway for the State's first decadal management review of the MLPA and MPA Network.

Proposed Chitqawi State Marine Conservation Area
Santa Ynez Band of Chumash Indians



Legend

- Proposed Chitqawi SMCA
- State Marine Reserve
- State Marine Conservation Area
- State Marine Park
- State Marine Recreational Management Area
- Coast Line

1	Piedras Blancas State Marine Reserve
2	Piedras Blancas State Marine Conservation Area
3	Cambria State Marine Conservation Area
4	White Rock (Cambria) State Marine Conservation Area
5	Morro Bay State Marine Reserve
6	Morro Bay State Marine Recreational Management Area
7	Point Buchon State Marine Reserve
8	Point Buchon State Marine Conservation Area

White Rock

Chitqawi

0 4 8 16 Miles

10/10/2023; Map Designed by Sophie Wilhoit; Tribal Marine Stewards Network; Basemap by Esri

CO-MANAGEMENT OF CALIFORNIA-CHUMASH MARINE CONSERVATION AREAS

A White Paper Produced for The Santa Ynez Band of Chumash Indians

with Funding Provided by the 7th Generation Advisors

MICHAEL VINCENT MCGINNIS, PhD

Bioregional Planning Associates Sacramento California

EXECUTIVE SUMMARY

Malibu's Paradise Cove August 19, 2011. Chumash paddle their tomol to meet the sailors in seven vaka moanas or sailing canoes from the Pacific Voyage. *Photo*: M.V. McGinnis.

ACROSS THE PACIFIC RIM, Tribal and Indigenous peoples are participating and co-managing marine protected areas. These co-management experiences provide opportunities and challenges to sustain Indigenous maritime practices. Co-management of marine protected areas can foster the integration of scientific and traditional ecological knowledge systems.

The planning effort under the Marine Life Protection Act (MLPA) of 1999 currently involves federally recognized Tribes. The goal of this report is to strengthen the opportunities to implement co-management of designated California-Chumash marine conservation areas located at Anacapa Island, Naples, Point Dume, and Kashtayit in southern California.

The implementation of the existing California-Chumash marine conservation areas is ongoing, and the State plans to review the progress of the MLPA in 2022. At that time changes may be made to the existing legislative framework, and other planning and decision-making changes

may be developed to foster further cooperation with Tribes and the State in the implementation of the MLPA and the co-management of designated marine conservation areas.

Based on a review of case study materials and the literature on co-management of protective areas, there are three major recommendations described in this report. First, a move from consultative co-management to collaborative management of designated California-Chumash marine conservation areas is warranted. Second, the following factors contribute to successful implementation of co-management of State-Tribal protected areas: public access to Tribal members to the protected area; the proximity to use of the marine area; the scientific baseline information on the ecology of the marine area; the historical level of customary marine resource use; the institutional capacity to monitor the designated MPA; the enforcement capacity and capability of partnering agencies and the Tribe of the MPA; and the available customary values and ecosystem goods and services provided by the MPA. These factors are used to analyze the four alternative California-Chumash marine conservation areas. Third, the Chumash should consider joining the Tribal Marine Stewards Network pilot program as the fifth partner in the collaborative network effort. There is currently no southern California Tribal partner in the pilot program. Two California-Chumash marine conservation areas may be appropriate to consider by the Chumash members given the analysis in this report -- the *Kashtayit* or Point Dume marine conservation areas. This recommendation is based on the historical use of customary practice by the Chumash of these areas; the proximity of use to these areas; the availability of public access to the sites; and other factors. Furthermore, the Chumash should consider ways to contribute as co-managers to the enforcement, education, information exchange, and the monitoring efforts to further the implementation of existing California-Chumash marine conservation areas.

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INTRODUCTION

Me'pshumawish. Together we are making health, harmony, peace.

This study builds on a previous report entitled *Tribal Marine Protected Areas: Protecting Maritime Ways and Cultural Practices* (McGinnis 2004) produced for the *Wishtoyo Foundation*. At the time of publication of that report, the Marine Life Protection Act (MLPA) of 1999 did not include a statutory role for the Tribes in the collaborative network process (Sagkof et al. 2021). In their legal analysis of the changing role of the Tribes in the MLPA Berkeley and Williams (2019: 307) write:

> Like the vast majority of California laws, the MLPA did not specifically address the rights and concerns of Indian tribes even though the California coast is Indian Country for many tribes. The failure of the legislature to acknowledge the centuries-long stewardship of coastal resources by Indian people, and the commencement of a resources-protection process that did not include tribes, resulted in initial opposition from Indian tribes. Many tribes feared the process would simply be the latest in a long history of state actions that risked the extinguishment of cultural practices. Instead, despite initial misunderstandings, the [marine protected area] MPA designation process elevated tribal engagement in state natural resource management and may be the catalyst for a fundamental shift in California's approach to tribal nations.

Requests to amend MPA regulations were submitted to the FGC by two different tribes: the Kashia Band of Pomo Indians and the Santa Ynez Band of Chumash Indians (hereafter, the Chumash). Tribal take was authorized in marine conservation areas that overlap with areas of historic and/or current uses for gathering, ceremony, or harvest as reflected in a factual record of use provided by a Tribe. There are four California-Chumash marine conservation areas that are located at sites in state waters at Anacapa Island, Naples, Point Dume, and *Kashtayit*.

The implementation of the existing California-Tribal marine conservation areas is ongoing. The first Decadal Management Review of the MLPA will take place in 2022, and will serve to review and potentially update four primary objectives of the MPA Management Program:

- Outreach and Education,
- Research and Monitoring,
- Enforcement and Compliance, and
- Policy and Permitting

The FWC will receive this review at their December 2022 meeting and decide whether to direct CDFW and its partners to pursue recommendations and identified next steps. At that time changes may be made to the existing legislative framework, and other planning and decision-making changes may be developed in cooperation with Tribes and California resource agencies to strengthen the co-management of designated marine conservation areas.

This paper begins with a description of the importance of traditional ecological knowledge or TEK and the Southern California Bight. Second, the paper characterizes the preliminary stages of implementation of the MLPA, and the changing role Tribes have in the collaborative network and decision-making. The paper reviews the co-management literature to suggest the need to move from *consultative* co-management to *collaborative* management of designated California-Chumash marine conservation areas.

In the last section, an analysis of the four alternative California-Chumash marine conservation areas is described. The alternative analysis is based on the following factors that contribute to successful co-management implementation:

- public access to Tribal members.
- the proximity to use of the marine area.
- the scientific baseline information on the ecology of the marine area.
- the historical level of customary marine resource use.
- the institutional capacity to monitor the designated MPA; and,
- the enforcement capacity and capability of partnering agencies and the Tribe of the MPA.

CHUMASH TEK AND THE SOUTHERN CALIFORNIA BIGHT

Federally recognized tribes are not mere stakeholders in the MLPA decision-making and collaborative process. As co-managers of marine life protection and management, Tribes are sovereign nations. Traditional ecological knowledge (TEK) is essential to the maintenance of Tribal maritime culture and should be considered a key facet of the co-management process for California-Chumash marine conservation areas. Moreover, the public and resource agencies can learn from TEK.

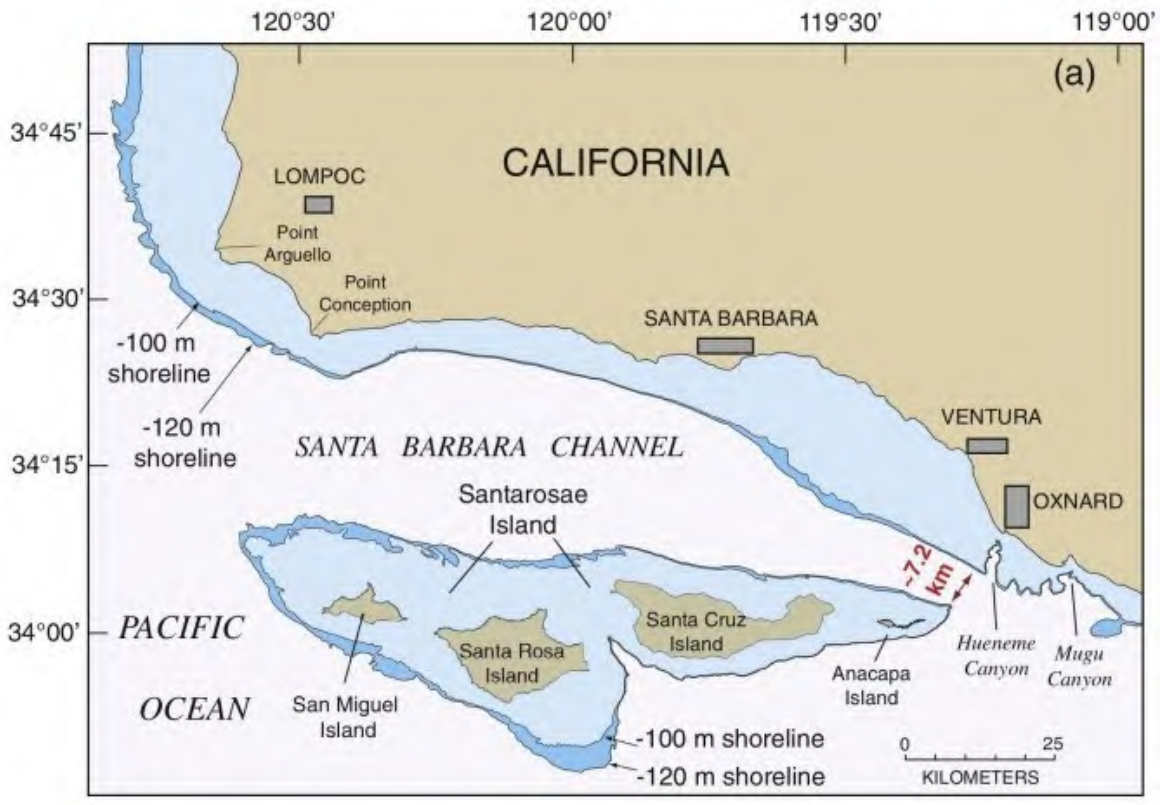
TEK is based on the interaction between traditional or Indigenous culture and the ecosystems that Tribal peoples are irrevocably connected to. In *Sacred Ecology*, Fikret Berkes (2008) describes two primary aspects of TEK that are important to consider as California and the Tribes move forward in the implementation of the MLPA. First, TEK should be considered a "process" rather than a "content." TEK is a process insofar as it changes and adapts to changes with ecosystems and cultural values. Second, there are benefits from a stronger integration and partnership between those who have TEK and scientific knowledge.

One hundred and forty-eight historic Chumash village sites have been identified from Malibu to San Luis Obispo, including eleven on Santa Cruz Island, eight on Santa Rosa Island, and two on San Miguel Island (Glassow 1995). The archaeological record shows that traditional Chumash maritime practices changed with a changing socio-ecological context. Mussel shells uncovered at excavated historical Chumash village sites indicate cyclical periods of species decline and rebound. These cyclical periods reflect changes in oceanographic setting of the California Current and the Southern California Bight, including short-term and longer-term (e.g., interdecadal oceanographic regime shifts) changes in sea surface temperature and associated changes in biogeography of fishes and invertebrates (Kennett 2005).

Moreover, archaeological and ethnographic evidence suggest that the periodic movement of Chumash village areas helped mediate socio-ecological changes in food security (Rick 2007). As in other traditional societies such as the Māori and other Pacific Islanders, Tribal peoples monitored and temporary banned fishing certain species in order for their respective populations to reach a more stable abundance. Chumash coastal inhabitants would change their diet to reflect changes in their food availability. Seaweeds, kelps, and other marine plants helped sustain Chumash populations; marine plants were often an essential food source during times of food insecurity.

Chumash TEK served the needs of cultural adaptation to changes in the socio-ecology of the Southern California Bight. The northern Channel Islands area were one connected island called *Santarosae* that was located nine kilometers from the coastal mainland (depicted in Map 1). Large-scale sea-level rise during the late Pleistocene and early Holocene periods inundated nearshore areas in many parts of the world, producing drastic changes in local ecosystems and obscuring significant portions of the archeological record (Reeder-Myers et al. 2015). Sea level was about 80–85 meters lower than present at the time of the first known human Chumash occupation.

Map 1. Santarosae Island before Sea-Level Rise



Source: KCET, *California's Atlantis: The Lost Superisland of Santarosae,* available at: https://www.kcet.org/shows/lost-la/californias-atlantis-the-lost-superisland-of-santarosae

There were major consequences from sea level rise on traditional cultures and customary practices of coastal southern California (Kennett 2005). At the close of the Pleistocene and start of the Holocene, people in coastal California faced shrinking land, intertidal, and subtidal zones that were used for food gathering and other customary uses. This led to a decline in food security and migration of traditional cultures. Second, as a consequence of sea-level rise in the Southern California Bight, including the Channel Islands and the coastal mainland areas, the archaeological and cultural areas used near river and creek mouths, coastal beach areas, and other areas historically inhabited by the Chumash are submerged today (Glassow 1995).

In addition, European colonialization of [*Alta*] California significantly impacted Chumash society (Dartt-Newton and Erlandson 2006). As Dartt-Newton and Erlandson (2006: 419):

> While natural environmental fluctuations may have played a role in the movement of Chumash people to the missions (particularly in the abandonment of Channel Island villages after AD 1810), we contend that colonial oppression and Spanish-induced environmental degradation were the chief culprits. No amount of scientific data can blunt the harsh realities of the mission period, when the Chumash and other California Indians died by the tens of thousands and most survivors were reduced to a humiliating slavery-like condition.

Overall, the socio-ecology of the islands and coastal mainland changed and so did the traditional and customary practices of the Chumash (Holmes and Johnson 1998). Chumash knowledge evolves with changes in living conditions. Chumash TEK sustained the diverse communities for thousands of years.

Tribes have a substantive role in the co-management of California-Tribal marine conservation areas. One hope is that Tribal TEK can contribute to the strengthening of the public's awareness of the sacred and customary values of coastal and marine ecosystems in California. These coastal and marine ecosystems have long been influenced by human activities and customary practices.

PRINCIPLES OF CO-MANAGEMENT

Definitions of co-management focus on sharing management responsibility between government and stakeholders (Brown and Pomeroy 1998; Pomeroy 2001; Berkes et al. 2001). Borrini-Feyerabend et al. (2000) note that co-management is a situation in which two or more social actors negotiate, define, and guarantee amongst themselves an equitable sharing of the management functions, entitlements, and responsibilities for a marine area. In this case, the sharing of responsibility under the MLPA is between State agencies and the Chumash.

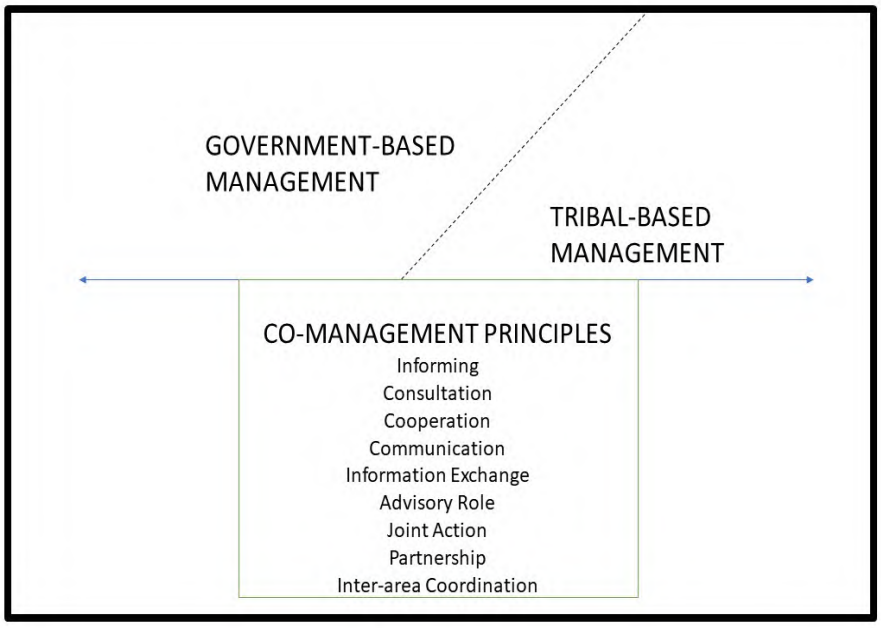
There are many benefits to co-management. The benefits include:

- improved management due to incorporation of better scientific evidence and TEK (Pinkerton 1989).
- more appropriate rules and regulations that can respond rapidly to changing soio-ecological conditions (Berkes et al. 2001; Ebbin 2002; Hernes et al. 2005).

- more effective and efficient enforcement due to increased legitimacy of the management structures (Berkes et al. 2001; Hanna 2003; Pinkerton and John 2008).
- can increase equitable and fair use of resources (Beierle and Cayford 2002; Borrini-Feyerabend et al. 2004; Coffey 2005); and
- can contribute to the empowerment and development of marginalized communities (Birner and Wittmer 2003; Hara and Nielsen 2003; Jentoft 2003; Pomeroy and Viswanathan 2003).

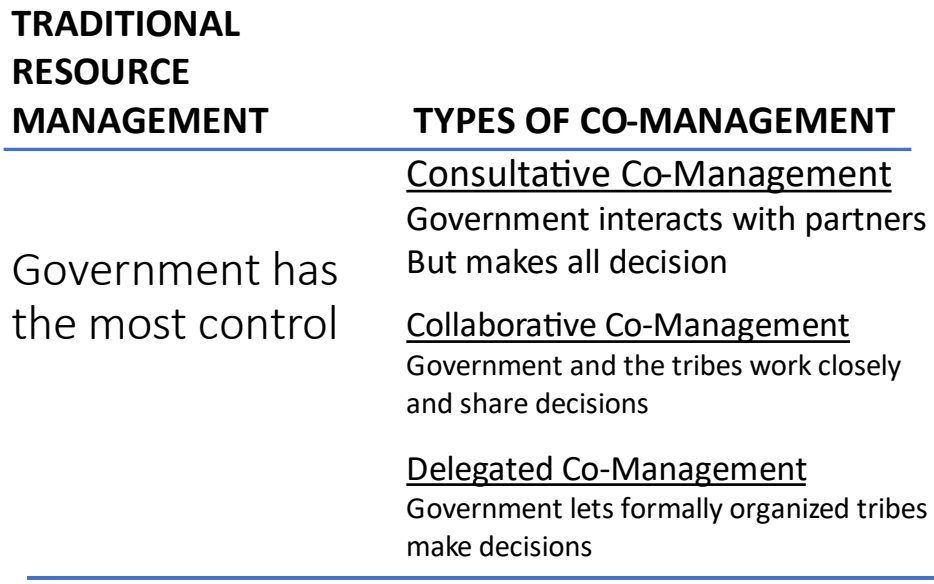
Figure 1 includes a general characterization of principles of co-management.

Figure 1. Co-Management Principles



There are three forms of co-management (depicted in Figure 2 below). The most common arrangement is described as "consultative co-management" whereby the resource agencies often consult with stakeholders or, in this case, Tribes (Brown and Pomeroy 1999). The term "collaborative co-management" connotes a stronger partnership where there is a sharing of authority and responsibility (Kurien 1988; McConney et al.1998). Third is "delegated co-management" that includes, but is not limited to, community-based management since national or state co-management structures are especially common in fisheries management (Jacobs 1998; McConney and Mahon 1998). Establishing successful co-management is seldom immediate. Like most participatory processes it takes time and careful attention to partnership building and strategic planning.

Figure 2. Types of Co-Management



A collaborative co-management approach to marine life protection requires the integration of two systems of governance and management. Tribal and customary management and marine ecosystem-based management systems have contrasting goals, inferred social and ecological benefits, and spatial scales. A general comparison of the diverse systems of management is found in Table 1.

Table 1. A Comparison of California and Tribal Management Systems

Management and Planning in the California MLPA	Tribal and Customary Management
Use of Ecosystem-based Principles in Planning	Cyclical processes and periodic benefits
Science-based Decision-making	Emphasis on the cultivation of TEK
Collaborative & Stakeholder based Planning	Utilitarian goals
Often dominated by Biological Conservation Goals	Sensitive to Socio-economic and Socio-ecological transformation
Operates on larger scales (e.g., networks of small reserves)	Complex tenure systems may hinder larger-scale conditions

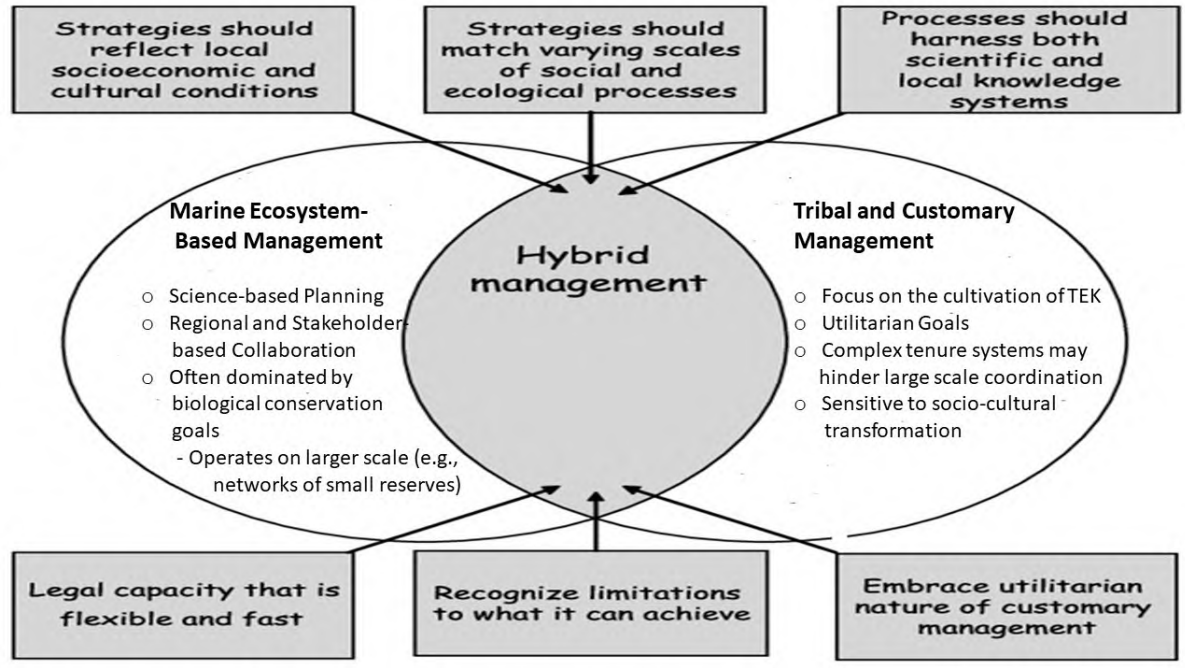
In collaborative co-management, there are three institutional factors that can contribute to the successful integration of authority and responsibility:

- Planning processes, including the monitoring and enforcement of marine protected areas, should harness both scientific and TEK systems.

- Program strategies should match varying scales of social, economic, and ecological processes.
- Program strategies should reflect local or regional socio-cultural conditions as they change overtime and as new information is gathered, e.g., strategic management should support adaptive approaches to planning in the future.

A hybridized co-management approach to marine life protection is depicted in Figure 3.

Figure 3. Hybrid Management



(*After* Pomeroy and Berkes 1997: 466)

Since the adoption of the MLPA in 1999, a number of steps have been taken by policymakers, resource agencies and members of Tribes to establish and encourage co-management of California-Tribal MPAs. Initial Studies, as required by CEQA, have been submitted and regulatory provisions have been approved by the California Department of Fish and Wildlife Commission (FGC). Governor Brown and Governor Newsome have signed Executive Orders to encourage co-management of marine resources with Tribes. California resource agencies have approved strategic goals and objectives in support of co-management principles to encourage co-management of California-Tribal marine conservation areas. Collaborative networks have been established that include formal Tribal membership. Pilot programs between California and the Tribes to develop monitoring programs and the deployment of data gathering to strengthen monitoring of existing MPAs have been developed.

CO-MANAGEMENT OF CALIFORNIA-CHUMASH MPAS

This section provides a general description of the early implementation of co-management of the California-Chumash marine conservation areas. A detailed overview of the early implementation of the MLPA and the role of the Tribes in the process is available at Sofka and colleagues (2021: 80-113) and Berkey and Williams (2019). These studies describe the collaborative, legal and historical role of the Tribes during the implementation of the MLPA.

The Move toward Tribal Exemption

Following adoption of MPAs in the North Coast MLPA planning process, a regulatory provision was adopted by the California Fish and Game Commission (FGC) to provide exemptions from MPA-specific area and take regulations for individual federally recognized California Tribes (i.e., tribal exemptions), through a petition process by the Commission. Requests to amend MPA regulations were submitted to the FGC by two different tribes: the Kashia Band of Pomo Indians (the Kashia) and the Chumash (Berkey and Williams 2019; Dudek 2018).

Tribal Take

"Federally recognized tribe" means any tribe on the List of Indian Entities Recognized and Eligible to Receive Services from the United States Bureau of Indian Affairs, published annually in the Federal Register. Any member of a federally recognized tribe authorized to take living marine resources from an area with area-specific take restrictions in subsection 632(b), when engaging in take within an authorized area shall possess on his person, in his immediate possession, or where otherwise specifically required by law to be kept, any valid license, report card, tag, stamp, validation, permit, or any other entitlement that is required in the Fish and Game Code, or required by other state, federal, or local entities, in order to take living marine resources. Members shall possess a valid photo identification card issued by a federally recognized tribe that contains expiration date, tribal name, tribal member number, name, signature, date of birth, height, color of eyes, color of hair, weight, and sex; and display any of the items listed above upon demand to any peace officer. Members taking living marine resources under this provision are subject to current seasonal, bag, possession, gear and size limits in existing Fish and Game Code statutes and regulations of the commission, except as otherwise provided for in subsection 632(b). No member, while taking living marine resources pursuant to this section, may be assisted by any person who does not possess a valid tribal identification card and is not properly licensed to take living marine resources. Nothing in the regulation is intended to conflict with, or supersede, any state or federal law regarding the take of protected, threatened or endangered species [Title 14, 632(a)(11)].

The Chumash requested the Commission to apply tribal take provisions in four SMCAs in southern California that are within their areas of historic and/or current tribal use. The regulations for the State Marine Conservation Areas (as January 1, 2019) are taken from California Code of Regulations (CCR) Title 14, Section 632, and are as follows:

The exemptions are consistent with allowing tribal take exemptions as currently defined in Title 14, §632(a)(11) (noted above), which identify how a member of a federally recognized tribe may be authorized to take living marine resources from an MPA with site-specific take restrictions.

A description of each California-Chumash marine conservation area is below (Dudek 2018):

1) **Kashtayit State Marine Conservation Area Permitted/Prohibited Uses**:
   a) It is unlawful to injure, damage, take, or possess any living, geological, or cultural marine resource for recreational and/or commercial purposes, with the following specified exceptions:
      i) The recreational take of finfish, invertebrates except rock scallops and mussels, and giant kelp (*Macrocystis pyrifera*) by hand harvest is allowed.
      ii) Take pursuant to the maintenance of artificial structures and operation and maintenance of existing facilities is allowed inside the conservation area pursuant to any required federal, state and local permits, or as otherwise authorized by the Department
   b) The following federally recognized tribe is exempt from the area and take regulations found in subsection 632(b)(97) and shall comply with all other existing regulations and statutes: Santa Ynez Band of Chumash Indians.
2) **Naples State Marine Conservation Area Permitted/Prohibited Uses**:
   a) It is unlawful to injure, damage, take, or possess any living, geological, or cultural marine resource for recreational and/or commercial purposes, with the following specified exceptions:
      i) The recreational take by spearfishing of white seabass and pelagic finfish is allowed.
      ii) The commercial take of giant kelp (*Macrocystis pyrifera*) by hand harvest or by mechanical harvest is allowed.
   b) Take pursuant to operation and maintenance of artificial structures inside the conservation area is allowed pursuant to any required federal, state and local permits, or as otherwise authorized by the Department.
   c) The following federally recognized tribe is exempt from the area and take regulations found in subsection 632(b)(98) and shall comply with all other existing regulations and statutes: Santa Ynez Band of Chumash Indians
3) **Point Dume State Marine Conservation Area Permitted/Prohibited Uses**:
   a) It is unlawful to injure, damage, take, or possess any living, geological, or cultural marine resource for recreational and/or commercial purposes, with the following specified exceptions:
      i) The recreational take by spearfishing of white seabass and pelagic finfish is allowed.
      ii) The commercial take of swordfish by harpoon; and coastal pelagic species by round haul net, brail gear, and light boat is allowed. Not more than five percent by weight of any commercial coastal pelagic species catch landed or possessed shall be other incidentally taken species.
   b) Take pursuant to beach nourishment and other sediment management activities is allowed inside the conservation area pursuant to any required federal, state and local permits, or as otherwise authorized by the Department.
   c) The following federally recognized tribe is exempt from the area and take regulations found in subsection 632(b) (117) and shall comply with all other existing regulations and statutes: Santa Ynez Band of Chumash Indians

4) **Anacapa Island State and Federal Marine Conservation Area Permitted/Prohibited Uses**:
   a) It is unlawful to injure, damage, take, or possess any living, geological, or cultural marine resource for commercial and/or recreational purposes, with the following specified exceptions:
      i) The recreational take of spiny lobster and pelagic finfish and the commercial take of spiny lobster is allowed.
   b) The following federally recognized tribe is exempt from the area and take regulations found in subsection 632(b) (112) and shall comply with all other existing regulations and statutes: Santa Ynez Band of Chumash Indians

The Chumash remain subject to the Anacapa Island Special Closure regulations where it overlaps with the Anacapa Island SMCA and are not exempt from the Anacapa Island Federal Marine Conservation Area take restrictions. Fishing with use of hand-based equipment and intertidal collection is allowed in this area, for which there is no pelican fledging area closure. Therefore, there are currently no exemptions in federal waters of the Channel Islands National Marine Sanctuary.

With respect to the role of the Tribes in the MLPA process Berkey and Williams (2019: 349-350) note that Governor Brown in Executive Order B-10-11 moved forward with formally recognizing the role of federally recognized tribes in marine governance:

> The perceptions of tribal representatives who participated in the late stages of the MLPA process bears out the truth of the Governor's observation. One tribal advocate said that, though there is a great deal of work yet to be done to fully recognize tribal rights to marine resources, the "space created by the MLPA is a promising first step."
>
> Both the State and some tribal representatives see a trend toward a marked increase in tribal participation in the development of state policy beyond that of marine resources. While not every tribe has the resources to respond to state agency invitations, at least they have a greater opportunity.

In Executive Order N-82-20 Governor Newsome also recognized the role of the Tribes in marine resource protection and supported further development and movement toward co-management of MPAs.

Co-management and the California Department of Fish and Wildlife

The Tribal Communication and Consultation Policy provides the foundation for the CDFW to work cooperatively, communicate effectively, and consult with Tribes. This policy also serves as the CDFW's primary means to implement Executive Order B-10-11 and the California Natural Resource Agency's Tribal Consultation Policy.

The *Master Plan for Marine Protected Areas – Appendix B* from the CDFW (2016: B-10) describes the existing co-management policy with respect to Tribes as follows:

> The purpose of this policy is to create a means by which tribes and Fish and Game Commission can effectively work together to realize sustainably managed natural resources of mutual interest.

This CDFW (2016) identifies the following priorities:

> 1. Communication. Both FWC and the Tribes are faced with innumerable demands on their limited time and resources. In the interest of efficiency, FWC will annually host a Tribal planning meeting to coordinate the upcoming regulatory and policy activities before FWC. The meeting will provide a venue for education about process, identifying regulatory and policy needs, and developing collaborative interests; this will include inviting sister agencies to participate.
>
> 2. Collaboration. In areas or subjects of mutual interest, FWC will pursue partnerships with tribes to collaborate on solutions tailored to each tribe's unique needs and capacity. The structure of these collaborative efforts can range from informal information sharing to Memorandum of Understanding (MOU) with more specific agreements regarding working relationships and desired outcomes, to co-management agreements with specific responsibilities and authorities.
>
> 3. Record-keeping. FWC will maintain a record of all comments provided by Tribes and will include them in administrative records where appropriate.
>
> 4. Training. FWC will provide training to interested Tribes on its processes for regulation and policy development.

The FWC *Co-Management Vision Statement and Definition* (February 2020) states:

> The vision of tribes, the California Fish and Wildlife Commission, and the California Department of Fish and Wildlife is to engage in a collaborative effort between sovereigns to jointly achieve and implement mutually agreed upon and compatible governance and management objectives to ensure the health and sustainable use of fish and wildlife [*my emphasis*].
>
> Definition: A collaborative effort established through an agreement in which two or more sovereigns mutually negotiate, define, and allocate amongst themselves the sharing of management functions and responsibilities for a given territory, area or set of natural resources [*my emphasis*].

The above strategy adopted by the CDFW clearly suggests the value of *collaborative* co-management with the Chumash to implement marine conservation areas.

The Tribal Marine Stewards Pilot Program

Esgro (2020) notes that Tribes are engaged with California resource managers in multiple forums for MPA management through participation in multiple decision-making bodies, notably the CDFW Tribal Subcommittee and representatives at the MPA Statewide Leadership Team (MSLT). California's MSLT includes four regional Tribal representatives to ensure that Tribes

are directly involved in the development of MPA policy. Tribal participation in the collaboratives has given way to funded Tribal-specific projects and initiatives.

In 2020, a Tribal Marine Stewards Network Pilot Program was approved by the Ocean Protected Council (OPC) that included a disbursement of $1,000,000 to the California Indian Environmental Alliance (CIEA) to support the development of a Tribal Marine Stewards Network pilot program. The objective of the program ram is to enhance engagement with Tribes and protect and restore coastal and marine ecosystems. According to OPC, this program is a mechanism to "advance California's efforts to support [I]ndigenous stewardship and adopt meaningful co-management measures."

The program is composed of four partner Tribes (Tolowa Dee-ni' Nation, Resighini Rancheria, Kashia Band of Pomo Indians, and the Amah Mutsun Tribal Band), and is supported by two non-governmental organizations (CIEA and Ecotrust). The program focuses on MPA monitoring and notes that Tribes will work to identify a fifth Tribe, ideally in southern California, who is interested in participating in the network. At the time of the writing of this report, the Chumash are not formally involved in this pilot program.

A timeline that includes a general summary of development in the co-management approach in California is below:

- Executive Order ("EO") B-10-11 started state agency tribal consultation under Gov. Brown
- 2012 Natural Resources Agency adopts Tribal Consultation policy
- 2014 CDFW adopts tribal Communication and Consultation Policy
- 2015 FGC Adopts Tribal Consultation Policy
- 2019 EO N-15-19 reaffirms Tribal Consultation by Gov. Newsom
- 2020 Tribal Subcommittee of FGC Adopts Co-Management Vision & definition
- 2020 Gov. 2d Annual Tribal nations Conference, Christina Snider, Gov. Tribal Advisor requests each tribe apply for co-management opportunities
- 2020 - Sept. 25: Gov. Newsom issues Statement of Administration Policy, Native American Ancestral Lands, "to facilitate tribal access, use and co-management of state owned or controlled natural lands."
- 2020 - Oct. 7: EO N-82-20 "to conserve 30% of California's land and coastal waters by 2030" and "to incorporate Tribal expertise and traditional ecological knowledge."

Moving from Consultation Co-Management to Collaborative Co-Management

In an evaluation of the MLPA collaborative network process, Sofka et al. (2021) describe a number of recommendations that can strengthen the collaborative co-management of California-Chumash marine conservation areas. Sofka et al. (2021) recommend the following:

- *Improve Tribal Engagement, Protocols, and Initiatives*
    - Provide cross-cultural training by establishing periodic cross-cultural training opportunities. Trainings should foster cultural awareness around interactions with Tribal groups. Allocate time and funding for ongoing collaborative, network, and

state cross-cultural training that reflects local Tribal culture, histories, and connection to place.

- Protocols to prioritize respect, reciprocity, and free, prior, and informed consent in all interactions that acknowledge historical and current injustices related to Tribal sovereignty. Sofka et al. (2021) recommend that California should evaluate how Tribal consent, respect, or reciprocity may have been violated with respect to resource management issues in general, and marine conservation specifically. California should review ways to redress these past violations, with an emphasis on transparency and accountability.
- Establish and abide by anti-discrimination policies approved and/or developed by Tribes. Sofka et al. (2021) recommend that California should determine which forms of discrimination, biases, or stereotypes Tribes have encountered through their participation in the collaboratives and MPA management. The State should review existing agency policies and interpretations that constrain Tribal participation, including but limited to considerations of inclusivity and accessibility.
- Consider the utility of developing a statewide MPA tribal committee and/or statewide Tribal collaborative.
- Engaging Tribes as partners in co-management, not stakeholders. The State should involve Tribal participants in decision-making bodies, forums, and protocols surrounding the control and co-management of MPAs. They also recommend that the State review how principles of Tribal co-management have been violated with respect to resource management issues in general, and ocean/MPA conservation specifically.
- Ensure Tribal co-authorship of language in all formal agreements. Sofka et al. (2021) recommend that Tribal authorship should take place in future planning and policymaking to ensure that Tribal perspectives, preferences, and confidentiality are appropriately captured.
- Establish protocols for integrating aspects of Tribal stewardship. Sofka et al. (2021) recommend that California establish and codify appropriate policies, best practices, and protocols at the collaborative and State levels of governance that emphasize the integration and acknowledgement of Tribal stewardship at all levels of MPA management. They also recommend that the State prioritize Tribally led and managed stewardship projects, such as the Tribal Marine Stewards Network.
- Prioritize the inclusion of all forms of Tribal and indigenous communities and recognize that Tribal communities exist far beyond federal recognition. Sofka et al. (2021) recommend that California prioritize the involvement of diverse forms of Tribal arrangements including but not limited to federally recognized Tribes, State recognized Tribes, unrecognized Tribes, consortiums, etc. The State should review with Tribal participants what groups have been excluded from this MPA management in the past, and the procedures which facilitated that exclusion. Sofka et al. (2021) also recommend that the Tribes and California determine how

management and planning approaches can be modified to engage a variety of formal and informal Tribal arrangements.

- *Establish Protections and Protocols for Tribal Decision-Making and Authority Around Knowledge and Data. This should include the establishment of policies with Tribal participants for knowledge requests, use, sharing, and mobilization within the collaboratives.*
    - Anticipate and honor diverse Tribal preferences for data management, collection, analysis, and use. These protocols should facilitate Tribal participation and information sharing in collaboratives and beyond, creating an atmosphere of consent.
    - Understand that Tribes may not consent to the sharing of their knowledge and data that has been passed down and safeguarded for generations. Similarly, acknowledge the diversity of Tribal science and knowledge, how it differs from non-Tribal science, and the ways in which TEK can be better protected.
    - Consider the integration of Tribally selected models of Indigenous data governance and data protection at all levels of MPA collaborative management. Sofka et al. (2021) recommend that California and the Tribes carefully review Tribal decision-making authority and consider if there have been instances where Tribes felt as though they did not have control over their data, and if so, what policies could be established to mitigate these scenarios going forward.

Careful consideration of these recommendations is warranted to strengthen the collaborative co-management approach to California-Chumash marine conservation areas.

CASE STUDIES OF CO-MANAGEMENT

This section includes a brief characterization of case studies on implementation of co-managed State-Tribal or Indigenous protected areas.

Fiji Locally Managed Marine Area (LMMA) Network

A locally managed marine area (LMMA) differs from a typical MPA in that LMMAs "are characterized by local ownership and/or control," whereas other forms of MPA are usually "designated by levels of management via a top-down approach" (Govan et al. 2006). The LMMA Network supports a collaborative co-management approach to manage coastal and marine resources. LMMA supports networks in Indonesia, the Philippines, Papua New Guinea, Palau, Pohnpei, Fiji and the Solomon Islands, and engages with more than fifteen other countries in the Indo Pacific. Case studies of member organizations within the LMMA are found in Rocliffe et al. (2014), Jupiter et al. (2014), and Robertson et al. (2020).

Increasingly, the LMMA Network is sharing its lessons globally, with increased interest not only in improved conservation outcomes, but also with an increased focus on social justice and the rights of traditional resource owners. Robertson et al. (2020) note that a LMMA, in the South Pacific context, is rooted in traditional and customary fisheries management and is designed to

gain support and active engagement from the local community, with the latter being a key condition for the successful and lasting implementation of MPAs.

The Fiji Locally Managed Marine Area (FLMMA) Network supports traditional communities who have observed declines in marine resources and their customary use of marine resources and want to act. The FLMMA Network is a non-profit and charitable association of resource conservation NGOs, government departments, academic institutions and over four hundred communities working together as co-managers to promote and encourage the preservation, protection and sustainable use of marine resources in Fiji.

The goals of the FLMMA are to:

- Provide practical capacity building, cost-effective and culturally appropriate engagement tools to promote locally led dialogues and management.
- Assist communities in managing their resources, often utilizing a revival of cultural traditions strengthened by contemporary science.
- Build trust, resiliency, confidence, and innovation through lesson sharing between practitioners.
- Follow a code of conduct that ensures community interests are the heart of any conservation effort.
- Advocate for communities at the national, regional, and international levels, for fair partnerships, policies, and support.

The Challenge of MPA governance in New Zealand and the Role of Māori

When New Zealand was settled by Europeans, a treaty was signed between Māori and the British Crown, called the Treaty of Waitangi. The Treaty gave guarantees that Māori would retain ownership and sovereignty over their customary resources. However subsequent government action deprived Māori of rights and land. It was only in the 1970s that the New Zealand government began to recognize the importance of partnership with the diverse Māori peoples. Today, much of the policy and legislation in relation to oceans governance requires consultation with local Māori (*tangata whenua*) and tribes (*iwi*) (McGinnis 2012).

The New Zealand government, as part of its obligations to Māori under the Treaty of Waitangi, has provided for some coastal and marine areas to be subject to the control of local Māori. Two types of protection can be granted over areas: *mātaitai* and *taiāpure*. Mātaitai reserves are established to protect traditional fishing grounds in internal waters or coastal waters. Within a mātaitai, commercial fishing is prohibited, but recreational fishing can continue. The *tangata whenua* can also request the Minister of Fisheries to create bylaws that restrict or prohibit recreational fishing. Other customary reserves are taiāpure-local fisheries. Consultation is required and an appeal against a decision by the Minister of Fisheries to establish a taiāpure-local fishery can be heard by a tribunal. Due to this process, they are harder to establish than mātaitai. The national government of New Zealand can deny designation of taiāpure-local fisheries.

There are several problems regarding Māori rights with respect to marine protection, and co-management has failed (McGinnis 2012). Application for marine reserve designation is

dependent on approval from other interested parties and government agencies. Current co-management legislation requires the Crown acting through the Department of Conservation have the final say regarding marine reserve management (Dodson, 2014). Co-management in New Zealand has not empowered local iwi or tribes in co-governance – there remains unequal authority between cultural groups and governmental organizations. Collaborative co-management could potentially minimize marginalization of Māori communities and increase successful marine reserve implementation (Carlsson and Berkes 2005; Berkes 2009; Mossop 2020). Fragmented government authority and inter-agency conflict also contribute to failure to live up to international best practice in protected area management in New Zealand.

Co-management between Australia and the Miriuwung-Gajerrrong People of Western Australia

Collaborative co-management involves Australia and the Miriuwung-Gajerrrong people of Western Australia, and the partnership that has evolved shows co-management can provide equity in managing a protected area (Hill, 2011). In this case, collaborative co-management established a balance between Indigenous values and State conservation values.

Co-management is central to the Australian government's approach to this conservation/ Indigenous nexus, and to delivering the enhanced equity with Indigenous people in protected areas. Indigenous people favor community-controlled approaches to protected areas in this region of Australia. Hill (2011) describes a number of reasons for the success of the Australia-Miriuwung-Gajerrrong co-management model:

- Respect the rights of traditional owners, custodians, or users to lands, territories and resources Indigenous land ownership
- Free, prior and informed consent of the Traditional Owners
- Legal protection for rights and interests of parties
- Respect and strengthen Indigenous peoples' institutions and customary laws
- Coherent and effective Indigenous representative party with legitimacy
- Sufficient resources to enable Indigenous participation
- Conflict management
- Respect and strengthen Indigenous peoples' exercising of authority and control
- Commitment of Indigenous people to assume the opportunities
- Appropriate technical and other advice
- Clear understanding of Indigenous ideas about success
- Traditional Owners in driving role

As a general summary, Hill (2011) identified three factors of significance for the establishment of a successful co-management of a protected area: (1) a foundation platform of recognition of rights and interests; (2) a set of effective organizations to support the roles of the key actors; and (3) effective mechanisms for working together.

A number of factors contribute to unsuccessful co-management, such as: unclear law with vague strategic and programmatic development; failure to uphold treaty rights and obligations for

Indigenous or Tribal peoples regarding their use or right to access protected areas; lack of resources granted to Indigenous or Tribal peoples to participate as partners in co-management planning and decision-making; lack of funding granted to implement and enforce co-management plans; lack of leadership; and, the lack of institutional capacity to address conflicts between partners in co-management planning efforts.

[An *Addendum* describes the co-management framework that has been adopted and implemented for the Olympic National Marine Sanctuary.]

AN ANALYSIS OF FOUR CALIFORNIA-CHUMASH MARINE CONSERVATION AREAS

Based on an analysis of the scholarly literature and case study material published on co-management of protected areas, this section provides an alternative analysis based on a sample of factors that often contribute to successful State-Tribal partnerships. The primary factors used in the analysis are:

- Public access of a marine area by Tribal members.
- The proximity to use of the marine area by Tribal members.
- The scientific baseline information on the ecology of the marine area.
- The historical level of customary marine resource use.
- The institutional capacity to monitor the designated MPA and enforce rules and regulations.

Table 2 depicts a general summary of the findings from this analysis. A characterization of the institutional capacity and capability of partnering organizations to monitor and enforce the rules and regulations of MPAs is described as well in the sections below the table.

[insert Table 2]

Institutional Capacity and Capability to Monitor and Enforce

A comprehensive evaluation of the institutional capacity and capability to monitor and enforce the existing MPA network is beyond the scope of this project. Starting in 2007, California Sea Grant partnered with the California Ocean Protection Council (OPC) and CDFW to administer research project funding for baseline monitoring of MPA's. These projects aimed to establish a snapshot of marine ecosystems and human activities around the time of the establishment of the new MPAs, and to document initial socioeconomic and ecological changes after the MPAs take effect. The South Coast was the third region to be studied as part of the MPA Baseline Monitoring Program. The projects ran from 2011 to 2017.

The MPA monitoring framework explicitly mentions the potential role of citizen science programs in MPA monitoring (CDFG 2008). Recently, many citizen-based science programs have endeavored to help provide these much-needed data (Freinwald et al., 2018). Implementation of MPAs under the MLPA Initiative in Southern California was followed by a monitoring program to establish a comprehensive baseline of the ecological conditions of several marine ecosystems at the time of MPA implementation. This baseline monitoring consortium involved several citizen science monitoring programs alongside more traditional academic monitoring programs, creating an opportunity to evaluate the potential for citizen scientists to become more involved in future long-term monitoring efforts.

Enforcement of existing CDFW regulations is based on education, public outreach, and a number of other factors, including the number of marine wardens. In an undercover operation and subsequent boarding by officers in 2013, CDFW wildlife officers observed eighteen violations including poaching within California's MPA) network, exceeding the possession limits of several fish species, using illegal methods to take fish, and failing to report accurate counts on logbooks. Monitoring and enforcement of MPA regulations will depend on the resources available to citizens, resource agencies and the Tribes to co-management designated areas. One obstacle often recognized in marine life protection is an "implementation deficit" whereby deficits occur during the implementation phase of policy development when there is a mismatch between fields of regulatory action. This can occur immediately or across a longer-term implementation phase. Immediate implementation deficits are caused by an excessively general definition of regulations or when policy goals are not operationalized in this field.

Recommendation

Based on the alternative analysis, the Chumash should consider joining the Tribal Marine Stewards Network pilot program as the fifth partner in the collaborative network effort. There is currently no southern California Tribal partner in the pilot program.

Two California-Chumash marine conservation areas may be appropriate to consider by the Chumash members given the analysis above: the *Kashtayit* or Point Dume marine conservation areas. This recommendation is based on the historical use of customary practice by the Chumash of these areas; the proximity of use to these areas; and the availability of public access to the sites.

Furthermore, the Chumash should consider ways to contribute as co-managers to the enforcement and monitoring efforts to further the implementation of existing California-Chumash marine conservation areas.

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November 28, 2023

California Fish and Game Commission
1416 Ninth Street, Suite 1320
Sacramento, CA 95814

Re: Petitions to the California Fish and Game Commission Regulation Change submitted by the Santa Ynez Band of Chumash Indians

Dear Commissioners,

The Santa Ynez Band of Chumash Indians welcomes the opportunity to submit the required forms (FGC 1) and summary narratives to the California Department of Fish and Game Commission to revise and amend existing regulations for marine protected areas within the Central Coast MLPA Region. Please find attached the following forms and documentation:

1) Petition to the California Fish and Game Commission for Regulation Change (FGC 1) for a new Chitqawi SMCA with a Summary Narrative and Map for consideration in the Central Coast Region.
2) Petition to the California Fish and Game Commission for Regulation Change (FGC 1) for amendments to the existing Point Buchon SMCA and SMR in the Central Coast Region with a Summary Narrative and White Paper produced by the Santa Ynez Band of Chumash Indians.

If you have any questions, please contact Sam Cohen, at 805-245-9083.

Thank you,

Sam Cohen

Sam Cohen, Esq.
Government Affairs and Legal Specialist

California Fish and Game Commission

Compilation of Public Comments on Petition 2023-19MPA

This PDF file compiles public comments that were included as exhibits in meeting materials and supplemental handouts for Commission and Marine Resources Committee (MRC) meetings since November 2023. Additional exhibits and supplemental handouts will be added after each Commission meeting, including those received by the public comment deadline, until the Commission takes final action on the petition.

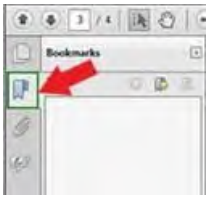
Note: Commission meeting materials include a representative selection of comments, rather than a comprehensive suite of all related comments received. Given the large volume of public comments received, the Commission has directed staff to summarize comments and provide a representative selection in meeting materials to reflect the range of perspectives shared. Commissioners are able to review a diversity of perspectives while still having access to all individual comments submitted, which are part of the Commission's administrative record. Members of the public may contact staff for access to any written comments not included in this document.

Last updated: through April 21, 2026 FGC

EASY GUIDE TO USING THE PACKET

1. Download and open the binder document using your Adobe Acrobat program/app.

2. If a bookmark panel does not automatically appear on either the top or left side of the screen, click/tap on the “bookmark symbol” located near the top left-hand corner.



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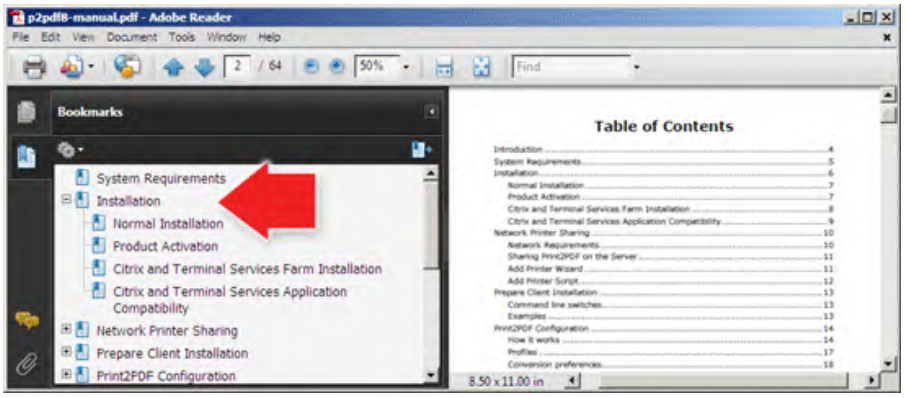

4. We suggest leaving open the bookmark panel to help you move efficiently among the comments in the packet. It’s helpful to think of these bookmarks as a table of contents that allows you to go to specific points in the packet without having to scroll through hundreds of pages.

5. You can resize the two panels by placing your cursor in the dark, vertical line located between the panels and using a long click /tap to move in either direction.

6. You may also adjust the sizing of the documents by adjusting the sizing preferences located on the Page Display icons found in the top toolbar or in the View tab.

7. Do not hesitate to contact staff if you have any questions or would like assistance.

From: Aubrie Fowler <[redacted]>
Sent: Wednesday, January 31, 2024 5:12 PM
To: FGC <FGC@fgc.ca.gov>; Ashcraft, Susan@FGC <[redacted]>
Cc: Calla Allison <[redacted]>; Claire Arre <[redacted]>; Jamie Blatter <[redacted]>
Subject: FGC Meeting Binder Submission

Hi Susan and Commission staff,

Please see the attached exhibit (saved as a PDF and Excel sheet, whichever formatting is preferred) to please be added to the meeting binder for the February Fish and Game Commission meeting on 2/14-2/15/2024.

The link to the Google sheet can be found **here** as well; this was the format that the MPA Collaborative Vetted Regulation Recommendations was previously shared with Commission and Department staff.

Please let me know if there's more context you need from me.

Thank you,
Aubrie

Aubrie Fowler (she/her)
South Coast Specialist
MPA Collaborative Network
cell: [redacted]
Sign-up for our Quarterly Newsletter
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County	MPA	Current Regs Summarized	Compliance concerns and/or management problem identified	Regulation Recommendation for Adaptive Management	Consensus?	Justification	Supporting Management Suggestion	Petitioner Lead	Contact Information	Recommendation Category	Designation Change?
Del Norte	Pyramid Point SMCA	Rec take of surf smelt by dip net or Hawaiian type throw net. Tolowa Dee-ni' exempt	Onshore and offshore hook and line fishing, collecting sand crabs as bait, kayak fishers, violations from boaters registered in both CA and OR	Remove allowance for surf smelt by dip net or Hawaiian type throw net; Change to No-Take SMCA with Tribal exemption for Tolowa Dee-ni'	Yes	Smelt is culturally important species to Tolowa and No Take designation will be clearer to public, reducing violations	Signs being vandalized, ripped out. Outreach to gain compliance needed (Guardian Watchmen)	Tolowa Dee-ni' Nation	rosa.laucci@tolowa.com	Take Allowance Change	Yes, from SMCA to No-Take SMCA with Tribal exemption
Del Norte	Pyramid Point SMCA	Rec take of surf smelt by dip net or Hawaiian type throw net. Tolowa Dee-ni' exempt	Elk Valley Rancheria is interested in exploring the possibility of being included in exempt status	Add Elk Valley Rancheria to exempt Tribes if requested by Tribal Council	Yes	Elk Valley Rancheria has ancestral ties to the area				Take Allowance Change	
Del Norte	Pyramid Point SMCA	Rec take of surf smelt by dip net or Hawaiian type throw net. Tolowa Dee-ni' exempt	Boundary is in Oregon	Change northern boundary to align with recognized California/Oregon state line	Yes	Original boundary used a mapping system that does not align with on-the-ground state line.		Tolowa Dee-ni' Nation	rosa.laucci@tolowa.com	Boundary Change	
Del Norte	Point St. George Offshore Reef SMCA	Rec take of salmon by trolling and Dungeness crab by trap. Commercial take of salmon with troll fishing gear and Dungeness crab by trap. Elk Valley and Tolowa Dee-ni' exempt		No change	Yes						
Del Norte	Sea Lion Rock Special Closure	300'	No data	No change	Yes						
Del Norte	Castle Rock Special Closure	300'	Poke poling at Preston Island and Battery Point and Hook Finger Point during extremely low tides. Kayaks near closure	No change	Yes						
Del Norte	False Klamath Rock Special Closure	300' from 3/1-8/31	Low flyovers by US Coast Guard helicopter. Kayaks near closure, kaking kelp. Dogs off leash	No change	Yes		Signs needed at Wilson Creek. Potential site for CoastSnap to crowdsource changes around rock				
Humboldt	Reading Rock SMCA	Rec take of salmon by trolling; surf smelt by dip net or Hawaiian type throw net; Dungeness crab by trap, hoop net or hand. Commercial take of salmon with troll fishing gear; surf smelt by dip net; Dungeness crab by trap. Trinidad, Resighini and Yurok exempt	Hook and line fishing and take of sand crabs regularly occur, especially at southern boundary Gold Bluffs beach traditional smelt camp Track amount of surf smelt taken (25 lbs current limit). Hawaiian Type throw net inappropriate	Work with California Tribes and indigenous people to change “Hawaiian type throw net” to a term that is more reflective of Indigenous Californian net based take methods	Yes	Reference to Hawaiian nets when indigenous terms exist for this take type is inappropriate and disrespectful	Monitor Surf smelt as a part of state monitoring plan.			Language Change	

Humboldt	Reading Rock SMCA	Rec take of salmon by trolling; surf smelt by dip net or Hawaiian type throw net; Dungeness crab by trap, hoop net or hand. Commercial take of salmon with troll fishing gear; surf smelt by dip net; Dungeness crab by trap. Trinidad, Resighini and Yurok exempt		Recommend implementing limits on commercial take of surf smelt	Yes	Culturally important species				Take Allowance Change	
Humboldt	Reading Rock SMR	No Take	Drifting commercial crab pots	No change	Yes						
Humboldt	Samoa SMCA	Rec take of salmon by trolling; surf smelt by dip net or Hawaiian type throw net; Dungeness crab by trap, hoop net or hand. Commercial take of salmon with troll fishing gear; surf smelt by dip net; Dungeness crab by trap. Wiyot exempt	Difficult to determine boundaries	Work with California Tribes and indigenous people to change “Hawaiian type throw net” to a term that is more reflective of Indigenous Californian net based take methods	Yes	Reference to Hawaiian nets when indigenous terms exist for this take type is inappropriate and disrespectful	Monitor recreational and commercial (through landing/block reports) take of salmon by troll and surf smelt by dip net and assess effect on population; Signs with you are here map at Mad River			Language Change	
Humboldt	South Humboldt Bay SMRMA	No Take except waterfowl may be taken. Wiyot exempt	Invasive grasses, loss of eelgrass, general threats to habitat. Non Tribal members clamming. Difficult to identify boundaries within South Humboldt Bay	Determine reason it does not extend to southern water’s edge and extend if no reason	Yes	Clearer for outreach purposes to say from southern end of bay to 2nd hunter pull out	Direct enforcement to look for unlawful clamming			Boundary Change	
Humboldt	Sugarloaf Island Special Closure	300’		No change	Yes						
Humboldt	South Cape Mendocino SMR	No Take	Minimal patrol	No change	Yes		Develop a plan for evaluating remote area MPAs to determine impact, such as temporary M2 radar/drone surveillance; support southern Humboldt patrol by LED				
Humboldt	Steamboat Rock Special Closure	300' 3/1-8/31	Confusion on when it is open to swim out to and when it is closed	No change	Yes		Sign that highlights special closure and closure dates				
Humboldt	Mattole Canyon SMR	No Take	Minimal patrol. Some commercial crab pots observed during USCG flyover	No change	Yes		Develop a plan for evaluating remote area MPAs to determine impact, such as temporary M2 radar/drone surveillance; support southern Humboldt patrol by law enforcement division				
Humboldt	Sea Lion Gulch SMR	No Take	Backpackers harvest mussels along entire Lost Coast Trail; people getting too close to new elephant seal colony. No cell connectivity to determine boundaries of MPA	Move southern boundary south to Cooskie Creek	BLM support but need fisher input	Creek is more identifiable feature for land based outreach to fishers hiking the Lost Coast Trail				Boundary Change	

Humboldt	Big Flat SMCA	Rec take of salmon by trolling and Dungeness crab by trap, hoop net or hand. Commercial take of salmon with troll fishing gear and Dungeness crab by trap. Multiple Tribes exempt	Backpackers harvest mussels along entire Lost Coast Trail; surf fishing occurs at Miller Flat. No cell connectivity to determine boundaries of MPA	No change	Yes		More outreach needed for fishers hiking lost coast. Include more detailed information in BLM Lost Coast map				
Mendocino	Double Cone Rock SMCA	Rec take of salmon by trolling; Dungeness crab by trap, hoop net or hand. Commercial take of salmon with troll fishing gear and Dungeness crab by trap	Unknown. Limited patrol. Report of excessive urchin and need for grazer suppression.	Reassess restoration policy in SMCAs impacted by climate change/kelp loss	Yes	Loss of kelp habitat needs to be addressed in this SMCA	Allow for restoration work/grazer suppression to address urchin barrens (reds and purples)	California Sea Urchin Commission - allow for commercial take of urchin		Other	
Mendocino	Vizcaino Rock Special Closure	300' 3/1-8/31		No change	Yes						
Mendocino	Ten Mile SMR	No Take	Primary concern is shore-based fishing (rod and reel at seaside creek beach). Recreational fishers take rockfish and lingcod, crab pots "walk themselves" into MPA at southern boundary. Dogs off leash	No change	Yes		OK/boundary sign needed at northern boundary. Simplify outreach language around MPA clusters				
Mendocino	Ten Mile Beach SMCA	Rec take of Dungeness crab by trap, hoop net or hand. Commercial take of Dungeness crab by trap. Many Tribes exempt	Unlawful take of fish (rockfish, lingcod); dogs off leash in snowy plover habitat. Potential sand dump site south side of Ten Mile Beach	No change	Yes		Simplify outreach language around MPA clusters				
Mendocino	Ten Mile Estuary SMCA	Waterfowl may be taken. Many Tribes exempt	Limited access for fishers	No change	Yes		Simplify outreach language around MPA clusters				
Mendocino	MacKerricher SMCA	All rec take allowed. Commercial take allowed except for bull kelp and giant kelp	Multiple violations occur daily since closest to Fort Bragg city center (general fish and game code violations). North boundary (Laguna Point) hotspot for intertidal take	Add protection for intertidal zone, per State Parks, in support for protection of the resource and ease of enforcement/outreach	Many in support but no full consensus	There are limited areas in the county to lawfully take intertidal animals such as mussels, turban snails, limpets, etc.	More enforcement support needed due to limited State Parks personnel. Focus on tidepool education. Intertidal specific take signs are needed	State Parks pending review		Take Allowance Change	
Mendocino	Point Cabrillo SMR	No Take	Lighthouse sees lots of boats fishing offshore of Frolic Cove on northern end of Point Cabrillo SMR or inside	No change	Yes		OK boundary signs would be beneficial on both boundaries for kayak fishing				
Mendocino	Russian Gulch SMCA	All rec take allowed. Commercial take allowed except for bull kelp and giant kelp	General fish and game code violations	No change	Yes						

Mendocino	Big River Estuary SMCA	Rec take of surfperch by hook and line from shore only and Dungeness crab by hoop net or hand. Many Tribes exempt. Waterfowl may be taken	Increased use for swimming and recreation has led to safety concerns, including close calls between swimmers and hunters. Swimmers mixing with motorized boats may lead to accidents	Hunting should be prohibited due to high public use/public safety issues, per State Parks	Yes	Community reported incidents of near misses between hunters/boaters and swimmers		State Parks pending review		Allowed Activity Change	
Mendocino	Big River Estuary SMCA	Rec take of surfperch by hook and line from shore only and Dungeness crab by hoop net or hand. Many Tribes exempt. Waterfowl may be taken	Can MPA restrict motorized vessels if not ecological reserve?	Restrict all motorized vessels with allowance for public safety, per State Parks	Yes, with clarification that motorized vessels are only restricted going east (up river)	West access from launch should be allowed for boaters going out to ocean	Data on crab fishery is needed to determine whether allowance is sustainable. Need clear signage restricting snare traps. Pick up after dog signs needed	State Parks pending review		Allowed Activity Change	
Mendocino	Van Damme SMCA	All rec take allowed. Commercial take allowed except for bull kelp and giant kelp	Overtake and take of undersize fish	No change	Yes						
Mendocino	Navarro River Estuary SMCA	Rec take of salmonoids by hook and line. Many Tribes exempt. Waterfowl may be taken	People illegally breach sandbar (but outside MPA?)	No change	Yes						
Mendocino	Point Arena SMR	No Take	Fishing in SMR reported by lighthouse manager	No change	Yes		OK boundary signs needed				
Mendocino	Point Arena SMCA	Rec take of salmon by trolling. Commercial take of salmon with troll fishing gear		No change	Yes						
Mendocino	Sea Lion Cove	Rec and commercial take of finfish	Urchin barrens	Reassess restoration policy in SMCAs impacted by climate change/kelp loss	Yes		Allow for restoration work/grazer suppression to address urchin barrens (reds and purples)	California Sea Urchin Commission - allow for commercial take of urchin		Other	
Mendocino	Saunders Reef SMCA	Rec take of salmon by trolling. Commercial take of salmon with troll fishing gear and urchin	Citations issued for people diving and taking at Schooner Gulch; illegal shore fishing from Hearn Gulch	No change	Yes		Additional enforcement personnel/efforts are needed				
Sonoma	Del Mar Landing SMR	No Take	Fishing at north end	No change	Yes		Trail pamphlets with MPA information				
Sonoma	Stewarts Point SMR	No Take	Poaching at 3 mile line. Difficult for fishers to determine where 3 mile line is and difficult to enforce from land	Allow for trolling of salmon. Change to SMCA?	No. Discussed with no strong opposition but more info needed	Impact to commercial salmon fishing can be addressed with minimal impact to other resources	More signage needed at public access points			Take Allowance Change	Yes, would change SMR to SMCA. No consensus
Sonoma	Stewarts Point SMCA	Rec take from shore only of marine aquatic plants other than sea palm, marine invertebrates, finfish by hook and line, surf smelt by beach net, species authorized by hand-held dip net	Tribal based MPA	Prohibit all take and add Kashia Pomo to Tribal exemptions to make affirmative rights of Tribal Members re: collection, harvesting, and research	Yes	MPA is only accessed by Kashia Tribal members from shore (owned by Tribe) so would be same protection while acknowledging Tribal rights				Take Allowance Change	Yes, change from SMCA to No-Take SMCA with Tribal exemption

Sonoma	Salt Point SMCA	Recreational take of abalone and finfish allowed	Take of abalone during closure; poaching of intertidal species. Confusion regarding intertidal take	No change	Yes		Needs more signage on collecting/take of shellfish and other non finfish				
Sonoma	Gerstle Cove SMR	No Take	Excessive intertidal take. Rec fishers fishing the line	No change	Yes		Need for good tidepooler rules signs to address harmful tidepooling				
Sonoma	Russian River SMRMA	No take except waterfowl may be taken	Marine mammal disturbance occurring. County of Sonoma needs to conduct restoration work as part of management plan	Allow for restoration work in SMRMA	Yes	Restoration will not impact haul out sites, marine mammals or birds				Other	
Sonoma	Russian River SMCA	Rec take of Dungeness crab by trap, and surf smelt by hand-held dip net or beach net. Commercial take of Dungeness crab by trap	Illegal onshore and offshore fishing; seal disturbance "seal selfies" near Goat Rock. Trash/dogs off leash	No change	Yes		More outreach for out of town fishers/permanent signage				
Sonoma	Bodega Head SMR	No Take	Take of rockfish and trolling for salmon; fishing on northern boundary off rocks Difficult “fan” shape and hard to identify northern boundary makes enforcement difficult	No change	Yes	Would require new outreach					
Sonoma/Marin	Bodega Head SMCA	Rec take of pelagic finfish by trolling, Dungeness crab by trap, and market squid by hand-held dip net. Commercial take of pelagic finfish by troll fishing gear and round haul net, Dungeness crab by trap, and market squid by round haul net	Take of rockfish and trolling for salmon; fishing on northern boundary off rocks Difficult “fan” shape and hard to identify northern boundary makes enforcement difficult	No change	Yes						
Sonoma/Marin	Estero Americano SMRMA	No take except waterfowl may be taken	Confusion as to boundary “high tide line” and who manages strip of beach between ocean and estuary that is often closed; Difficulty identifying eastern boundary. No way to see boundary from shore	No change	Yes		More signs needed at access points here to address compliance concerns				
Marin	Estero de San Antonio SMRMA	No take except waterfowl may be taken	Some take (animal remains) and illegal fishing	No change	Yes						
Marin	Point Reyes SMR	No take	Sand dollar and fossil take, rod and reel fishing from vessels, party boats troll for salmon; violations are limited offshore	No change	Yes		Signage and more enforcement needed, especially at Drakes Beach and Coast Guard Station. Consolidated mixed messaging signs, with dog information.				

Marin	Point Reyes SMCA	Rec take of salmon by trolling and Dungeness crab by trap. Commercial take of salmon with troll fishing gear and Dungeness crab by trap	Commercial crabbers set coonstripe shrimp traps on top of crab traps; Boundaries in MPA cluster hard to identify; NPS jurisdiction limited to	No change	Yes						
Marin	Point Reyes Headlands Special Closure	No access from mean high tide line to a distance of 1000 feet seaward	Recreational vessels fishing in summer; Disturbance spiked in 2020; USFW continues to monitor this area	No change at this time	Yes	Might need to revisit making adjustments in the future if data shows changes/increases in disturbance					
Marin	Estero de Limantour SMR	No take	Difficult to determine boundary between SMR and Drakes Estero SMCA makes enforcement difficult. There are suspicions that poaching of clams occurs in the SMR from people on kayaks from Drakes Estero	Extend SMR designation all the way into Drakes Estero	Yes	NPS in support of expanding SMR because federally designated wilderness, major harbor seal haul out, and critical nursery habitat for leopard shark and bay rays		EAC Marin with NPS letter of support		Boundary Change	
Marin	Drakes Estero SMCA	The recreational take of clams is allowed	Difficult to determine boundary line between Drakes Estero SMCA and Estero de Limantour SMR leading to poaching. Cows accessing/pooping from NPS ranch leased land	Prohibit clamming in Drakes Estero SMCA. Merge with Estero de Limantour SMR.	Yes	SMCA designation was originally due to oyster farm that is no longer there. NPS in support of making into a SMR due to federally designated wilderness area	Give people direction/ outreach materials on where they CAN clam safely	EAC Marin with NPS letter of support		Take Allowance Change	Yes, change from SMCA to SMR
Marin	Point Resistance Rock Special Closure	No access from mean high tide line to a distance of 300 feet seaward of rock	Seabird flushing by vessels. USFW monitoring area.	No change	Yes	GFNMS thinks current regulations are good, very important to their mission and public outreach					
Marin	Double Point/Stormy Stack Special Closure	No access from mean high tide line to a distance of 300 feet seaward of rock	Seabird flushing by vessels and surfers, who enter harbor seal rookery. Increased visitation due to people hiking to Alamere Falls	No change	Yes	GFNMS thinks current regulations are good, very important to their mission and public outreach and don't want to extend to shore to allow shore access	Put signs with regulations and text about importance of special closure at trailhead; more outreach to boaters about special closures needed				

Marin	Duxbury Reef SMCA	Recreational take of finfish from shore and abalone* is allowed	Difficult to enforce and outreach about why you can take finfish but not invertebrates. Beach Watch data at this site for 30 years show slight decrease in activities in last 10 years, but take of invertebrates has been observed, and the Greater Farallones National Marine Sanctuary Superintendent has provided information about the need to consider additional conservation measures at Duxbury Reef. Maria Brown (NMS) submitted a letter saying Duxbury Reef would benefit from increased protection of unique and important habitat of entire reef (largest shale reef in N. America). EAC MPA Watch data shows	Change to SMR because of difficulty of interpretation and enforcement. Extend southern boundary further out to sea (south) and northern boundary to Double Point to fully cover reef	No	No agreement on extending boundaries to cover the reef and changing to SMR. More research needed on benefits of changing existing ribbon from SMCA to SMR; Might be important fishing access point for public	More signs needed and more support for onsite education and enforcement from CDFW to agate beach and land-side terrestrial Duxbury	EAC Marin		Take Allowance Change	Yes, would change SMCA to SMR. No consensus
Marin	Duxbury Reef SMCA	Recreational take of finfish from shore and abalone* is allowed	Heavy use and impacts, intertidal take – buckets and tools (e.g., crow bars, tire jacks) used to take black turban snails and purple urchin that are nestled into cracks. People need to break the reef to get to purple urchin	Potential compromise would be to add specific tidepool protections, similar to OC	TBD	NMS would like to continue conversation to explore potential compromises	Research other tidepool docent programs in MPAs with mixed use of allowed fishing/tidepool protections			Language Change	
San Francisco	North Farallon Islands SMR	No Take	Commercial crab case here	No change	Yes	More data needed for this MPA cluster	Increase CDFW LED patrols during peak months. Need for CCFRP program here				
San Francisco	North Farallon Islands Special Closure	No vessel shall be operated or anchored at any time from the mean high tide line to a distance of 1000 feet seaward of the mean lower low tide line of any shoreline of North Farallon Island, or to a distance of 300 feet seaward of the mean lower low tide line of any shoreline of the remaining three southern islets		No change	Yes						

San Francisco	Southeast Farallon Islands SMR	No Take	Small recreational boats. A number of encroachments occur into SMR during better weather months	No change	Yes		Increase patrols from LED and consider M2 radar at this location				
San Francisco	Southeast Farallon Islands SMCA	Recreational take of salmon by trolling and commercial take of salmon by troll fishing gear	Salmon fishers use salmon gear to fish for halibut	No change	Yes						
San Francisco	Southeast Farallon Islands Special Closure	Closed 300 feet seaward year-round, except Fisherman's Bay to East Landing, southeastern tip of the island and southeastern side of Saddle (Seal) Rock, which is closed from December 1 through September 14. 5 mile per hour speed limit 1000 ft seaward of mean lower low tide of any shoreline Exhaust system requirements for commercial dive boats	Boats cut across the special closure	No change	Yes	Predates MLPA process, careful consideration went into crafting special closure regulations					
San Mateo	Egg (Devil's Slide) Rock to Devil's Slide Special Closure	A special closure is designated from the mean high tide line to a distance of 300 feet seaward of the mean lower low tide line of any shoreline of any of the three rocks comprising Egg (Devil's Slide) Rock; Transit in between the rock and the mainland between these points is prohibited at any time.	Reported violations include fishing boats inside boundaries and low flying aircraft/drones	Change name to "Devil's Slide Special Closure"	Yes	Egg rock is no longer a name used/recognized locally. Devil's Slide is more appropriate and simpler for outreach				Language Change	
San Mateo	Montara SMR	No Take	A top cited MPA in Central Coast, highest in San Mateo; fishing offshore and tidepool take; Difficulty interpreting southern boundary	Move Montara SMR onshore southern boundary to current Pillar Point SMCA southern boundary (north end of Maverick's Beach), then extending out to current offshore southern SMR boundary point	Yes	Easier for enforcement and makes SMR boundaries consistent with Fitzgerald Marine Reserve boundaries				Boundary Change	

San Mateo	Pillar Point SMCA	The recreational take of pelagic finfish by trolling, Dungeness crab by trap, and market squid by hand-held dip net is allowed. The commercial take of pelagic finfish by troll or round haul net Dungeness crab by trap, and market squid by round haul net is allowed.	Unclear boundary leads to poaching in intertidal Difficult for local law enforcement to ensure compliance of tidepool take regulations due to high volume of consumptive visitors	Extend southern SMCA boundary further south to edge of harbor jetty, extending out to existing offshore southern point. Onshore northern boundary would be same as Montara SMR onshore southern boundary	Yes	Would cover entire reef in MPA for ease of allied agency outreach and enforcement.				Boundary Change	
San Mateo	Pillar Point SMCA	The recreational take of pelagic finfish by trolling, Dungeness crab by trap, and market squid by hand-held dip net is allowed. The commercial take of pelagic finfish by troll or round haul net Dungeness crab by trap, and market squid by round haul net is allowed.		Change regulations to allow for recreational hook and line take of finfish from shore and take of mussels, crabs, snails and seaweeds for equity and access purposes	Yes	Allowing for shore based hook and line and some intertidal take maintains access for consumptive users while applying some protection for a heavily impacted habitat				Take Allowance Change	
San Mateo/Santa Cruz	Año Nuevo SMR	No Take	Unlawful take of snails; fishing; wildlife disturbance. Boats driving squid out of MPA. Confusion because sign at top of trail to Greyhound Rock says fishing beach but must go left at bottom to legally fish	Move southern boundary line to have whole of Greyhound Rock in SMR	Yes, at both Santa Cruz and San Mateo Collaborative meetings	Clearer boundary makes enforcement easier	Ensure sign with map at bottom of trail. Utilize social/digital/traditional media for public outreach	State Parks pending review		Boundary Change	
San Mateo/Santa Cruz	Greyhound Rock SMCA	Rec take of giant kelp by hand harvest only, market squid, salmon. Other finfish by hook and line only from shore. Commercial take of giant kelp by hand harvest only, salmon and market squid	Take of mussels at southern boundary Confusion with Año Nuevo SMR boundary/whether fishing is allowed at Greyhound Rock Split between 2 counties	Move northern boundary line to have whole of Greyhound Rock outside of SMCA and in SMR; Move southern boundary south to beginning of Scott Creek bridge	Yes, at both Santa Cruz and San Mateo Collaborative meetings	Reef should be fully protected or fully open. Preference to cover reef but either way will have clearer boundary for outreach/enforcement. Move of southern boundary would cover reef to address intertidal impacts	Need for sign with map at Scotts Creek	State Parks pending review		Boundary Change	
San Mateo/Santa Cruz	Greyhound Rock SMCA	Rec take of giant kelp by hand harvest only, market squid, salmon. Other finfish by hook and line only from shore. Commercial take of giant kelp by hand harvest only, salmon and market squid	Confusing regulations	Replace comma with semi-colon in regulations after "giant kelp by hand harvest only", or otherwise edit	Yes	Clearer language needed to clarify you are not required to catch salmon and squid by hand harvest only		State Parks pending review		Language Change	Section 100 change
Santa Cruz	Natural Bridges SMR	No Take	Hard to identify boundaries; safety concerns with fishers and swimmers at Natural Bridges State Park beach	Shift both boundaries south to more identifiable features (4 mile point and Natural Bridge)	Yes	State Parks would like SMR to cover the beach at Natural Bridges SP for public safety reasons	Need for interpretive signs with maps/good tidepooler rules, why MPAs, etc.	State Parks pending review		Boundary Change	
Santa Cruz	Soquel Canyon SMCA	Rec and commercial take of pelagic finfish	Split between 2 counties	No change	Yes						

Monterey	Elkhorn Slough SMR	No Take	Fishing occurs regularly at Kirby Park pier/dock, was originally built for fishers with disabilities with SFRA grant. Inconsistent enforcement.	Move northern boundary south of Kirby Park pier/dock. Shift entire MPA to maintain size	Yes, at both Santa Cruz and Monterey Collaborative meetings	Opens fishing area as originally intended to limit poaching; supports increased enforcement presence in area	If Kirby is open, must be concerted cross-jurisdictional effort to enforce shore waste of fish/debris and other F&G Code violations. Need for good fishing practices outreach	Elkhorn Slough Foundation		Boundary Change	
Monterey	Elkhorn Slough SMCA	The recreational take of finfish by hook and line only and clams is allowed. Clams may only be taken on the north shore of the slough in the area adjacent to the Moss Landing State Wildlife Area [subsection 550(a)].	Difficult to determine where SMR/SMCA boundary is (i.e., where kayak fishers can no longer fish).	Move SMR line to bird watching platform (eastern side)	Yes, at both Santa Cruz and Monterey Collaborative meetings	Bird watching platform provides a clear boundary for shore and kayak fishers and would maintain size of SMR with shift off Kirby		Elkhorn Slough Foundation		Boundary Change	
Monterey	Elkhorn Slough SMCA	The recreational take of finfish by hook and line only and clams is allowed. Clams may only be taken on the north shore of the slough in the area adjacent to the Moss Landing State Wildlife Area [subsection 550(a)].	Clamming disturbs sea otter rafts. Huge amounts of trash (fishing receptacles full)	Removing allowance for clamming to address impact to otters and human health considerations	Maybe?	Need more info on impact to recreational clammers and safety of consuming clams	Need for more trash receptacles/removal	Elkhorn Slough Foundation		Take Allowance Change	
Monterey	Moro Cojo Slough State Marine Reserve	No take	Some access on eastern end. Agricultural influence. Elkhorn Slough NERR in support of no change	No change	Yes						
Monterey/Santa Cruz	Soquel Canyon State Marine Conservation Area	Recreational and commercial take of pelagic finfish is allowed	Many violations, especially illegally set crab traps (commercial) and rockfish take (recreational). Whale disturbance. More impact due to depth restrictions lifted	No change	Yes						
Monterey	Portuguese Ledge State Marine Conservation Area	Recreational and commercial take of pelagic finfish is allowed	Many violations, especially rockfish take (recreational). Whale disturbance	No change	Yes						
Monterey	Edward F. Ricketts State Marine Conservation Area	Recreational take of finfish by hook and line. Commercial take of giant kelp and bull kelp by hand	Fishing debris from Coast Guard pier. Abalone and other intertidal poaching at breakwater	Explore regulations to limit fishing gear loss from Coast Guard pier (such as requiring use of breakaway leaders or no braided line)	Yes	Fishing gear loss impacts wildlife, habitat, and safety of divers due to entanglement	Partner with MBNMS on outreach of litter/derelict fishing gear			Language Change	
Monterey	Edward F. Ricketts State Marine Conservation Area	Recreational take of finfish by hook and line. Commercial take of giant kelp and bull kelp by hand	New regulations may restrict fishing for rockfish from boat close to shore after October 1	Change to SMR and join with Lovers Point-Julia Platt SMR	Maybe	No strong opposition but no fishing reps present		Giant Giant Kelp Restoration Project (G2KR)		Take Allowance Change	Yes, would change from SMCA to SMR

Monterey	Edward F. Ricketts State Marine Conservation Area	Recreational take of finfish by hook and line. Commercial take of giant kelp and bull kelp by hand		Allow restoration/urchin culling without requiring SCP	No	May lead to destruction of healthy urchins		Giant Giant Kelp Restoration Project (G2KR) - applies to Ed Ricketts, PG Gardens, and Carmel Bay SMCAs, and will include suggestion for buoys on sites		Other	
Monterey	Lovers Point- Julia Platt State Marine Reserve	No Take	Fishing off Lovers Point rocks, undersize and immature fish, spearfishers and fishing boats catch halibut, illegal tidepool take; confusion around northern boundary line	Move southern boundary line so Lovers Point is either all in or all out (with preference for all in reserve)	No	Disagreement about where to move line	Boundary marker or fishing/no fishing arrow sign needed if boundary doesn't change			Boundary Change	
Monterey	Lovers Point- Julia Platt State Marine Reserve	No Take		Move southern boundary to end of Lovers Point, splitting point equally in half	Yes	Fishing/No fishing arrow signs would make sense/be more accurate	Fishing/no fishing arrow sign needed at Lovers Point			Boundary Change	
Monterey	Pacific Grove Marine Gardens State Marine Conservation Area	Recreational take of finfish. Commercial take of giant kelp and bull kelp by hand	Spearfishing violations, especially from kayaks and dinghies; illegal take of scallops and crustaceans; undersize and immature fish taken Point Pinos is key oystercatcher nesting habitat	Move both boundary lines so Lovers Point and Point Pinos are all out of SMCA and in SMRs because both are key oystercatcher nesting sites	No	Rock outcropping and buoy at Point Pinos (southern boundary) are currently good boundary indicators for boaters				Boundary Change	
Monterey	Pacific Grove Marine Gardens State Marine Conservation Area	Recreational take of finfish. Commercial take of giant kelp and bull kelp by hand		Move northern boundary to end of Lovers Point	Yes	Fishing/No fishing arrow signs would make sense/be more accurate	Fishing/no fishing arrow sign needed at Lovers Point and Point Pinos			Boundary Change	
Monterey	Pacific Grove Marine Gardens State Marine Conservation Area	Recreational take of finfish. Commercial take of giant kelp and bull kelp by hand	New regulations may restrict fishing for rockfish from boat close to shore after October 1	Change to SMR, join with Lovers Point SMR	Maybe	No strong opposition but no fishing reps present		Giant Giant Kelp Restoration Project (G2KR)		Take Allowance Change	Yes, would change from SMCA to SMR
Monterey	Asilomar State Marine Reserve	No Take	Onshore and offshore fishing common, hook and line from nooks and crannies; harmful tidepooling, tidepool take; wildlife disturbance common Northern boundary at Point Pinos is confusing, splits rocks in half	No change	Yes		Fishing/No Fishing arrow signs needed at Point Pinos				
Monterey	Carmel Pinnacles State Marine Reserve	No Take	Offshore violations common	No change	Yes						
Monterey	Carmel Bay State Marine Conservation Area	Recreational take of finfish. Commercial take of giant kelp and bull kelp by hand	Intertidal take common, including abalone and mussels. Golf balls go into MPA and are not collected. Some kelp take at Stillwater Cove	No change	Yes		Work with Pebble Beach on reducing golf ball litter either through requiring biodegradable balls at key holes or ensuring balls are collected by divers				
Monterey	Point Lobos State Marine Reserve	No Take	Take occurs. Boundaries are confusing	No change	Yes						

Monterey	Point Lobos State Marine Reserve	No Take		Allow restoration/urchin culling	No	Difficult for enforcement/interpretation in no-take area		Giant Giant Kelp Restoration Project (G2KR)		Other	
Monterey	Point Lobos State Marine Conservation Area	Recreational take of salmon and albacore and the commercial take of salmon, albacore, and spot prawn is allowed		No change	Yes						
Monterey	Point Sur State Marine Reserve	No Take	Violations common between SMR and SMCA, southern corner is hard to enforce. Abalone case reported	Encompass the whole coastline of Point Sur in MPA	No	Keep boundaries as is				Boundary Change	
Monterey	Point Sur State Marine Conservation Area	Recreational and commercial take of salmon and albacore		Add bluefin tuna to list of species allowed for take	No	Lessens protection				Take Allowance Change	
Monterey	Big Creek State Marine Reserve	No Take	L-shape of SMR within SMCA is confusing	No change	Yes						
Monterey	Big Creek State Marine Conservation Area	Recreational take of salmon and albacore. Commercial take of salmon, albacore	Potential unlawful fishing off Marine Lab	No change	Yes						
San Luis Obispo	Piedras Blancas State Marine Reserve	No take	Missing signs. Onshore fishing violations (poaching mussels at Point Sierra Nevada). Wildlife disturbance. Extreme angle makes kayak fishers look like they are fishing in SMR	No change	Yes		Use boundary images on signs to help reference angle at pullout.				
San Luis Obispo	Piedras Blancas State Marine Conservation Area	Recreational and commercial take of salmon and albacore	Occasional poaching observed. Fishing for rockfish. No albacore, limited salmon observed by fishers/wardens	No change	Yes						
San Luis Obispo	Cambria State Marine Conservation Area	All recreational take is allowed	Harmful tidepooling occurring throughout MPA. Difficult to message good tidepooler rules without designated protections	Add tidepool protection language similar to Crystal Cove and Dana Point SMCAs	Yes	Would make it easier to message about responsible tidepooling and reduce inadvertent take	Tools for existing SP tidepool docent program needed here, such as Natural Bridges State Park tidepool cart	State Parks pending review; Environment California?		Take Allowance Change	
San Luis Obispo	Cambria State Marine Conservation Area	All recreational take is allowed	Boundary between Cambria SMCA and White Rock SMCA is confusing, leading to accidental poaching by kayak fishers putting in at boundary at Wedgewood	Shift White Rock SMCA northern boundary to end of neighborhood at Lampton Park. Shift southern boundary south 1/2 mile accordingly to not lose any protection and cover some kelp habitat	Yes	May be some pushback from commercial live rockfish fishery for southern shift but recreational anglers in support		Environment California?		Boundary Change	
San Luis Obispo	Cambria State Marine Conservation Area	All recreational take is allowed	No commercial take allowed but there is an existing kelp lease?	Remove kelp lease 209 OR clarify that lease holder cannot harvest within Cambria SMCA	Yes	Commercial harvest of kelp is incompatible with MPA regulations that allow recreational take only		Environment California?		Other	

San Luis Obispo	White Rock State Marine Conservation Area	Commercial take of giant kelp and bull kelp with valid lease	Boundary between Cambria SMCA and White Rock SMCA is confusing, leading to accidental poaching of kayak fishers putting in at boundary at Wedgewood	Shift White Rock SMCA northern boundary to end of neighborhood at Lampton Park. Shift southern boundary south 1/2 mile accordingly to not lose any protection	Yes	May be some pushback from commercial live rockfish fishery for southern shift but recreational anglers in support		Environment California?		Boundary Change	
San Luis Obispo	White Rock State Marine Conservation Area	Commercial take of giant kelp and bull kelp with valid lease		Prohibit commercial take of giant kelp and bull kelp with valid lease and change to an SMR	Yes	Original intent was a reserve but there was existing kelp lease. Current lease holder is fine with relinquishing/ disallowing take of kelp		Environment California?		Take Allowance Change	Yes, would change from SMCA to SMR
San Luis Obispo	Morro Bay State Marine Recreational Management Area	Waterfowl hunting allowed. Recreational take of finfish north of line at Pasadena Point. Aquaculture allowed	Poaching occurs at southern side that does not allow take of finfish. Line is confusing and unclear on maps and outreach materials. Illegal invertebrate take (e.g., sea stars at jetty, ghost shrimp at Windy Cove). Signs needed at blue pier	Shift no fishing boundary 150 yds north to public access at Pasadena Park (between Santa Ysabel and Baywood Way)	Yes	Makes it easier for county to manage and educate more accurately about fishing/no fishing line	Signs needed, especially at Blue Pier. County can install sign at Pasadena Park			Boundary Change	
San Luis Obispo	Morro Bay State Marine Recreational Management Area	Waterfowl hunting allowed. Recreational take of finfish north of line at Pasadena Point. Aquaculture allowed	Hunting "within" a bird sanctuary (City of Morro Bay) is confusing, safety concerns for paddlers with increased visitors who are unaware hunting is allowed. Concern about safety issues around hunting around neighborhoods. Trampling of plants occur on shoreline in Baywood Park.	No change to regulations at this time	Yes	Important hunting area. Confusion should be addressed through outreach	Overlay hunting map on SMRMA for outreach purposes Mixed message signs/more education needed about estuary impacts/erosion: "tread lightly" in Los Osos				
San Luis Obispo	Morro Bay State Marine Reserve	No Take	Some hunting violations, hugging line; Boardwalks work to protect birds! Might be good to have one at Baywood Park at 1st Street	No change (reluctantly)	Yes	Some desire to extend SMR west and into bottom part of bay beneath Baywood Peninsula but do not want to impede on aquaculture	More education and outreach needed				
San Luis Obispo	Point Buchon State Marine Reserve	No Take	Regular poaching offshore, trolling, and stopping to drop a line in water. Busiest MPA in SLO, most violations observed/cited	Move northern boundary to actual Point Buchon	Yes	Clearer boundary for fishers coming from Port San Luis	Boundary marker needed here. Make "flagpole" more visible (hang flag?) if boundary doesn't change	State Parks pending review		Boundary Change	
San Luis Obispo	Point Buchon State Marine Conservation Area	Recreational and commercial take of salmon and albacore allowed	Regular poaching, rockfish and lingcod, maybe some squid boats?	No change	Yes						

Santa Barbara and Ventura (Santa Barbara Channel)	Vandenberg SMR	No Take	Vandenberg Space Force Base (VSFB) allows active-duty officers, their dependents/families, and guests to fish off Vandenberg. Leads to confusion since officially a no-take area. Regulations should match take allowed. Petition has been submitted by City of Lompoc to allow shore fishing at Surf Beach	Change designation to SMCA that allows hook and line for finfish from shore only	Yes	Would increase actual protection due to past 5 Base Commanders' decision to allow all legal take on base and would address equity concerns by allowing access for non-military at Surf Beach		Greg Helms to propose intertidal ribbon		Take Allowance Change	Yes, would change from SMR to SMCA
Santa Barbara and Ventura (Santa Barbara Channel)	Vandenberg SMR	No Take		Revaluate MOA with VSFB that is being interpreted as allowing for full military recreational take in a no-take SMR	No, not needed if designation is changed to SMCA	Vandenberg conservation officer will enforce updated take regs on military personnel				Other	
Santa Barbara and Ventura (Santa Barbara Channel)	Point Conception SMR	No Take	Recent groundfish case. Difficult for enforcement to access from land through Dangermond Preserve. M2 radar at Pt. Conception shows a lot of boating activity, may	No change	Yes		Provide continued support for M2 radar with ground truthing and continued coordination/info sharing between agencies				
Santa Barbara and Ventura (Santa Barbara Channel)	Kashtayit SMCA	Rec take of finfish, invertebrates (except rock scallops and mussels) and giant kelp by hand harvest. Santa Ynez band of Chumash exempt	Illegal and dangerous access down the bluffs on Gaviota. Fishing without a license. Access issues for pier fishers with Gaviota pier closed. Difficult to interpret	Reword regulations for clarity of outreach: "Recreational take of finfish, invertebrates, and giant kelp allowed"	Yes	Simpler regulations will make outreach easier, increasing compliance, with minimal impacts to the resources	Have FGC/State push for pier repair at Gaviota Pier (SB County/State Parks) for safety/access reasons	State Parks pending review/Greg Helms		Language Change	Section 100 change
Santa Barbara and Ventura (Santa Barbara Channel)	Naples SMCA	Rec take by spearfishing of white seabass and pelagic finfish. Commercial take of giant kelp by hand or mechanical harvest. Santa Ynez Band of Chumash exempt	Hook and line fishing and access issues occur here, and most days there are at least two vehicles for fishing or surfing parked near Naples. Impact to hook and line fishers	Add hook and line to allowed method of take	No	Numbers/impact/level of take different between hook and line and spearfishing. Would drastically reduce protection				Take Allowance Change	
Santa Barbara and Ventura (Santa Barbara Channel)	Campus Point No-Take SMCA	No Take	Onshore and offshore hook and line fishing continues to be observed	Change purple to red for outreach purposes	Yes	Easier to explain "no take" if consistent with red SMR		Greg Helms		Other	
Santa Barbara and Ventura (Santa Barbara Channel)	Goleta Slough No-Take SMCA	No Take	Trespassing (e.g., illegal swimming, dogs). People occasionally use nets to fish here and/or fish off bridges at the finger boundaries of the slough. Dumping of sediment still occurs in Goleta Bay	Consider water quality designation for Goleta Bay	Yes	Goleta Bay is between two MPAs and there is a need to address impacts of sediment dumping to subsistence fishers off Goleta Pier		Greg Helms		Other	
Santa Barbara and Ventura (Santa Barbara Channel)	Goleta Slough No-Take SMCA	No Take		Change purple to red for outreach purposes	Yes	Easier to explain "no take" if consistent with red SMR		Greg Helms		Other	

Santa Barbara and Ventura (Santa Barbara Channel)	Richardson Rock SFMR	No Take		No change	Yes						
Santa Barbara and Ventura (Santa Barbara Channel)	San Miguel Island Special Closure	Allowance for sea urchin divers between Castle Rock and Judith Rock SMR western boundary (Point Bennet) between 3/15-4/30 and 10/1-12/15.	Commercial urchin poaching. Purpose to reduce disturbance to pinniped populations. Is closure still necessary? Point Bennet has one of the largest pinniped (six species) rookeries on the West Coast of North America	Revaluate need for special closure (SC); Clean up language to address confusion between 300 yards describing SC and 100 yards keeping boats from whole Island 102 A.1.(a)	Yes		M2 radar at NMFS marine mammal station	Greg Helms		Language Change	
Santa Barbara and Ventura (Santa Barbara Channel)	Harris Point SFMR	No Take	CDFW sees some fishers that are taking from shore, although it is not common	No change	Yes		Use land-based range markers (e.g., O & K) to mark boundaries				
Santa Barbara and Ventura (Santa Barbara Channel)	Judith Rock SFMR	No Take		No change	Yes		Use land-based range markers (e.g., O & K) to mark boundaries				
Santa Barbara and Ventura (Santa Barbara Channel)	Carrington Point SMR	No Take	Confusing angle relative to pier	No change	Yes	NPS outreach on angle has been good	More permanent boundary markers/signage is needed				
Santa Barbara and Ventura (Santa Barbara Channel)	Skunk Point SMR	No Take	Difficult to determine how far offshore boats are (in or out)	No change	Yes						
Santa Barbara and Ventura (Santa Barbara Channel)	South Point SFMR	No Take		No change	Yes						
Santa Barbara and Ventura (Santa Barbara Channel)	Painted Cave SMCA	Rec take of spiny lobster and pelagic finfish	People are taking non-pelagic fish species, rockfish, California sheephead, and live fish	No change	Yes						
Santa Barbara and Ventura (Santa Barbara Channel)	Gull Island SFMR	No Take		Have state discuss with NMS changing federal area to FMCA to allow for take of pelagics	No	More data/justification needed				Take Allowance Change	Yes, would turn federal MRs into federal MCAs. No consensus
Santa Barbara and Ventura (Santa Barbara Channel)	Scorpion SFMR	No Take	Fishing/take in little coves at eastern boundaries. Lobster traps	No change	Yes		More on-island enforcement presence needed				
Santa Barbara and Ventura (Santa Barbara Channel)	Anacapa Island Special Closure	No net or trap may be used in waters less than 20 feet deep. Brown Pelican closure from Portuguese Rock to Frenchy's Cove 1/1-10/31	Brown pelican area makes it difficult for Island Packers and others to land legally at Frenchy's	Add exemption to allow access/landing Frenchy's Cove	Yes	Intent was to allow landing at Frenchy's Cove but aligning brown pelican closure with SMR/SMCA boundary closed off access to safe landing		Greg Helms		Allowed Activity Change	
Santa Barbara and Ventura (Santa Barbara Channel)	Anacapa Island Special Closure	No net or trap may be used in waters less than 20 feet deep. Brown Pelican closure from Portuguese Rock to Frenchy's Cove 1/1-10/32	Depth hard to enforce due to sheer drop off from island	Reassess need for Special Closure and consider removing if not justified	Yes	May only need brown pelican closure rather than full island special closure to protect seabirds		Greg Helms		Allowed Activity Change	Yes, would remove special closure

Santa Barbara and Ventura (Santa Barbara Channel)	Anacapa Island SFMCA	Rec take of spiny lobster and pelagic finfish. Commercial take of spiny lobster. Santa Ynez Band of Chumash exempt	Confusion regarding what "pelagic" means may lead to unlawful take	No change	Yes		Outreach needed around pelagics				
Santa Barbara and Ventura (Santa Barbara Channel)	Anacapa Island SFMR	No Take	Violations for unlawful take	No change	Yes						
Santa Barbara and Ventura (Santa Barbara Channel)	Footprint SFMR	No Take	Lots of violations. Boats drift in because they cannot anchor	Have state discuss with NMS changing federal area to FMCA to allow for take of pelagics	No	More data/justification needed				Take Allowance Change	Yes, would turn federal MRs into federal MCAs. No consensus
Santa Barbara and Ventura (Santa Barbara Channel)	Begg Rock SMR	No Take	The MPA violations here are commercial and come from experienced	No change	Yes						
Santa Barbara and Ventura (Santa Barbara Channel)	Santa Barbara Island SFMR	No Take	Osborne Bank. CPFV/commercial lobster poaching. Overlapping jurisdictions	Have state discuss with NMS changing federal area to FMCA to allow for take of pelagics	No	More data/justification needed	M2 radar needed to monitor remote MPA			Take Allowance Change	Yes, would turn federal MRs into federal MCAs. No consensus
Los Angeles (Mainland)	Point Dume SMCA	Rec take by spearfishing of white seabass and pelagic finfish. Commercial take of swordfish by harpoon and coastal pelagic species by round haul net, brail gear, and light boat. Santa Ynez band exempt	Frequent noncompliance with MPAs and limited enforcement	Delete allowance for commercial take of Swordfish by harpoon	Yes	Swordfish fishing does not occur that close to shore	Additional enforcement personnel/efforts are needed	State Parks pending review; Heal the Bay		Take Allowance Change	
Los Angeles (Mainland)	Point Dume SMCA	Rec take by spearfishing of white seabass and pelagic finfish. Commercial take of swordfish by harpoon and coastal pelagic species by round haul net, brail gear, and light boat. Santa Ynez band exempt		Allow hook and line fishing for allowed method of take of white seabass and pelagic finfish	No	Lessening of protection/unclear impacts				Take Allowance Change	
Los Angeles (Mainland)	Point Dume SMR	No Take	Angle of eastern boundary is confusing/extends due west and is close to shore	No change	Yes		Use of surveyed boundary images in outreach can help address confusion with eastern boundary at Paradise Cove				
Los Angeles (Mainland)	Point Vicente No-Take SMCA	No Take	Frequent noncompliance with MPAs and limited enforcement	No change	Yes		Additional enforcement personnel/efforts are needed				
Los Angeles (Mainland)	Point Vicente No-Take SMCA	No Take	Confusion of significance of purple designation	Keep allowance for maintenance but change color from purple to red for ease of public interpretation	Yes	Easier to explain "no take" if consistent with red SMR				Other	

Los Angeles (Mainland)	Abalone Cove SMCA	Rec take by spearfishing of white seabass and pelagic finfish; and market squid by hand-held dip net. Commercial take of swordfish by harpoon and coastal pelagic species by round haul net, brail gear, and light boat	Harmful tidepooling impacts/take from tidepools. Frequent noncompliance with MPAs and limited enforcement	Delete allowance for commercial take of swordfish by harpoon	Yes	Swordfish fishing does not occur that close to shore	Additional enforcement personnel/efforts are needed	Heal the Bay		Take Allowance Change	
Los Angeles (Mainland)	Abalone Cove SMCA	Rec take by spearfishing of white seabass and pelagic finfish; and market squid by hand-held dip net. Commercial take of swordfish by harpoon and coastal pelagic species by round haul net, brail gear, and light boat		Allow hook and line fishing for allowed method of take of white seabass and pelagic finfish	No	Lessening of protection/unclear impacts				Take Allowance Change	
Los Angeles (Catalina Island)	Arrow Point to Lion Head Point SMCA	All rec and commercial take allowed. Take of invertebrates prohibited	Poaching lobster and abalone. Hoop nets. Difficult to identify 1,000 feet from shore at Indian/Endemic Rock	No change	Yes		Need for a locally managed (research) buoy to mark 1,000 feet point				
Los Angeles (Catalina Island)	Blue Cavern Onshore No-Take SMCA	No Take. No anchor area in original refuge boundaries	Fishing/using hoop nets close to shore at Big Fisherman Cove. Poaching at Yellowtail Point and Bird Rock; Confusion around no anchor zone	Change purple to red for outreach purposes	Yes, only if all current maintenance/access activities are still allowed	Easier to explain "no take" if consistent with red SMR	Need for some boundary marker at Yellowtail Point. MPA Watch transect would help identify use/ compliance issues here			Other	
Los Angeles (Catalina Island)	Blue Cavern Offshore SMCA	Rec take of pelagic finfish by hook and line and spearfishing and white seabass by spearfishing and market squid by hand held dip net. Commercial take of pelagic finfish by hook and line and swordfish by harpoon	Take via illegal gear types	No change	Yes						
Los Angeles (Catalina Island)	Long Point SMR	No Take	Trolling through MPA occurs. Misconception that MPA is only close to shore. Rental boats go past Long Point and fish	Make a distance from shore rather than lat/long for ease of outreach. Cut off corner and flip and move west (offshore) to maintain size	Yes	Clearer outreach to trollers to stay certain distance from shore, IF maintains size				Boundary Change	
Los Angeles (Catalina Island)	Lover's Cove SMCA	Rec take by hook and line from the Cabrillo Mole is allowed. Feeding fish allowed	Fishing from shore at the ramp near the Mole. Angle is difficult at eastern boundary. Food torpedoes are shot from tourist subs to attract fish to windows	Remove allowance for feeding of fish	Yes	Against intent of MLPA, affecting behavior of fish/habitat; public safety issue as fish become more aggressive and bite				Allowed Activity Change	
Los Angeles (Catalina Island)	Casino Point No-Take SMCA	No Take. Feeding fish allowed	Boundaries don't match dive park buoys. Feeding fish may be incompatible use. 40-50' depth at MPA line.	Remove allowance for feeding of fish.	Yes	Against intent of MLPA, affecting behavior of fish/habitat; public safety issue as fish become more aggressive and bite	Might need to utilize a weaning off process for fish used to being fed			Allowed Activity Change	

Los Angeles (Catalina Island)	Casino Point No-Take SMCA	No Take. Feeding fish allowed		Change purple to red for outreach purposes for outreach	Yes	Easier to explain "no take" if consistent with red SMR				Other	
Los Angeles (Catalina Island)	Farnsworth Onshore SMCA	Rec take by spearfishing of white seabass and pelagic finfish; marline, tunas and dorado by trolling and market squid by hand held dip net. Commercial take of swordfish by harpoon, coastal pelagics by roundhaul net, brail gear and light boat	More difficult to assess whether poaching is occurring on the backside. Challenging/confusing for fishers	No change	Yes		More outreach to fishers needed on why deep habitat/fish are protected here				
Los Angeles (Catalina Island)	Farnsworth Offshore SMCA	Rec take of pelagic finfish by hook and line or by spearfishing; white seabass by spearfishing; marlin, tunas and dorado by trolling and market squid by hand held dip net. Commercial take of swordfish by harpoon, coastal pelagics by roundhaul net, brail gear and light boat	CPFVs (party boats) are seen illegally fishing in Farnsworth Offshore SMCA, moving out if they see the CDFW patrol boat approaching. Regs restricting take of rockfish can be confusing for fishers/challenging to prove rockfish on board was taken outside	No change	Yes						
Los Angeles (Catalina Island)	Cat Harbor SMCA	Rec take of finfish by hook and line or by spearfishing, market squid by hook and line, and spiny lobster and sea urchin. Commercial take of sea cucumbers by diving only and spiny lobster and sea urchin. Aquaculture of finfish	Some take of undersized fish	No change	Yes						
Orange	Bolsa Bay SMCA	Rec take of finfish by hook and line from shore in designated areas only	Confusion between Bolsa Bay and Bolsa Chica Basin MPAs	Potentially combine Bolsa Bay with Bolsa Chica Basin MPAs?	No	State Lands requirement to have fishing				Boundary Change	Yes, would change from SMCA to SMR. No consensus
Orange	Bolsa Chica Basin No-Take SMCA	No Take. Allows for maintenance of artificial structures	Water management infrastructure is failing - needs management and repairs. Shoaling and potential closing of inlet - need cost effective alternative to dredging and $ to implement. Could ultimately change boundaries of MPAs	MPA should cover all waters in ecological reserve. Move northeastern boundary to Graham	Yes	Makes enforcement easier so CDFW can cite for unlawful fishing using 632 instead of no trespassing		OC Coastkeeper	Wendy Berube	Boundary Change	
Orange	Bolsa Chica Basin No-Take SMCA	No Take. Allows for maintenance of artificial structures	Confusion between Bolsa Bay and Bolsa Chica Basin MPA regulations and whether take is allowed. Bridge inconsistency	Change purple to red for outreach purposes	Yes	Easier to explain "no take" if consistent with red SMR		OC Coastkeeper	Wendy Berube	Other	

Orange	Upper Newport Bay SMCA	Rec take of finfish by hook and line from shore in designated areas only	Ecological Reserve and MPA overlapping jurisdiction. Fishing from floats by PCH bridge and using gill nets at Jamboree	No change	Yes		Harbor and estuary signs needed at Newport Dunes. Additional enforcement personnel/efforts are needed				
Orange	Crystal Cove SMCA	Rec take of finfish by hook and line or by spearfishing and spiny lobster and sea urchin. Commercial take of sea urchin, spiny lobster by trap, and coastal pelagic species by round haul net, brail gear and light boat	Harmful tidepooling and undersized lobster. Nighttime poaching. Angle is difficult at southern boundary	Better define tidepool definition to encompass rocky intertidal habitat	Yes	"Area encompassing the rocky pools" is confusing, makes it sounds like it is only the pools, not intertidal zone when dry	Night vision for State Parks officers to address nighttime poaching	State Parks pending review; OC Coastkeeper	Wendy Berube	Language Change	
Orange	Crystal Cove SMCA	Rec take of finfish by hook and line or by spearfishing and spiny lobster and sea urchin. Commercial take of sea urchin, spiny lobster by trap, and coastal pelagic species by round haul net, brail gear and light boat		Add "non-living, geological or cultural" marine resource to tidepool take prohibition for consistency with 632(a)1(C)	Yes	Clarifies tidepool protections to include rocks and shells		State Parks pending review; OC Coastkeeper	Wendy Berube	Language Change	
Orange	Laguna Beach SMR	No Take	Poaching in gated/private communities; angle is difficult at northern boundary	No change	Yes		More enforcement needed in private community. Bring back community scientist/anglers (i.e., CCFRP) to OC				
Orange	Laguna Beach No-Take SMCA	No Take. Maintenance allowed	Angle is difficult at southern boundary	Change purple to red for outreach purposes	Yes	Easier to explain "no take" if consistent with red SMR	Produce map that has layer that shows allowed maintenance/artificial structures and scientific take	OC Coastkeeper	Wendy Berube	Other	
Orange	Dana Point SMCA	Rec take of finfish by hook and line or by spearfishing and spiny lobster and sea urchin. Commercial take of sea urchin, spiny lobster by trap, and coastal pelagic species by round haul net, brail gear and light boat. Tidepools protected	Fishing without a license. Night poaching at 3 Arch. Take of limpets at north end. Shift in fishing pressure. Angle is difficult at southern boundary. Harmful tidepooling	Add "non-living, geological or cultural" marine resource to tidepool take prohibition for consistency with 632(a)1(C)	Yes	Clarifies tidepool protections to include rocks and shells		OC Coastkeeper	Wendy Berube	Language Change	
Orange	Dana Point SMCA	Rec take of finfish by hook and line or by spearfishing and spiny lobster and sea urchin. Commercial take of sea urchin, spiny lobster by trap, and coastal pelagic species by round haul net, brail gear and light boat. Tidepools protected		Better define tidepool definition to encompass rocky intertidal habitat or utilize a different term.	Yes	Tidepools are specific to pools but intertidal habitats protected can be free of pools in some cases. "Area encompassing the rocky pools" is unclear whether all rocky intertidal habitat is included here.		OC Coastkeeper	Wendy Berube	Language Change	
San Diego	Batiquitos Lagoon No-Take SMCA	No take. Boating, swimming, wading and diving prohibited	Confusion between ecological reserve regulations west of 5 and MPA regulations east of 5	Expand SMCA west of I-5 bridge to encompass all of ecological reserve	No	Expands MPA size, unclear on impacts to recreational fishing				Boundary Change	

San Diego	Batiquitos Lagoon No-Take SMCA	No take. Boating, swimming, wading and diving prohibited		Change to blue SMCA with designated fishing areas	Maybe	If does not reduce fishing opportunities under I-5 and 101 bridges, or lessen existing protections				Take Allowance Change	Yes, would change from No-Take SMCA to SMCA
San Diego	Batiquitos Lagoon No-Take SMCA	No take. Boating, swimming, wading and diving prohibited		Change purple to red for outreach purposes if boundaries remain the same	Yes	Easier to explain "no take" if consistent with red SMR				Other	
San Diego	Swami's SMCA	Rec take by hook and line from shore and rec take by spearfishing of white seabass and pelagic finfish	Harmful tidepooling, especially at Seaside reef. Enforcement for take of lobster is hard at southern boundary since it splits 2 jurisdictions and the reef (hard to know where they are actually taking from and who is responsible for enforcing what.)	Move southern boundary to jurisdictional boundary between State Parks and City of Solana Beach for full tidepool protection of reef	No	Increases size of MPA, reducing fishing access, and may impact take of halibut				Boundary Change	
San Diego	Swami's SMCA	Rec take by hook and line from shore and rec take by spearfishing of white seabass and pelagic finfish		Shift entire shape south (lifeguard tower to state/Solana Beach line to cover tidepool on south side)	Yes	Compromise. Keeps same size MPA but covers impacted tidepool area on southern boundary. Lifeguard tower clear boundary at north end		State Parks pending review; Wildcoast		Boundary Change	
San Diego	San Elijo Lagoon No Take SMCA	No take. Boating, swimming, wading and diving prohibited	Lots of people fishing at entrance to San Elijo lagoon under bridge and in channel	Move boundary to west side of the bridge (prohibiting fishing under the bridge) as long as accommodations are allowed for dredging	Yes	Signs are currently posted on west side of bridge to prohibit people from entering the San Elijo Lagoon. Makes outreach clearer		State Parks pending review; Wildcoast		Boundary Change	
San Diego	San Elijo Lagoon No Take SMCA	No take. Boating, swimming, wading and diving prohibited		Change purple to red for outreach purposes	Yes	Easier to explain "no take" if consistent with red SMR				Other	
San Diego	San Dieguito Lagoon SMCA	Rec take of finfish by hook and line from shore. Boating, swimming, wading and diving prohibited	Confusion between ecological reserve boundaries and regulations and MPA boundaries and regulations. Speculation that extent of water has changed since restoration. Original intent of 632 was to align with 630 in overlapping waters. Non-MPA areas are more restrictive which leads to confusion	Have MPA cover all water within ecological reserve.	Need more information	Check with Joint Power authority because would lessen protections if SMCA (that allows fishing) is expanded to all state waters	Sea level rise impacts should be considered			Boundary Change	
San Diego	San Diego-Scripps Coastal SMCA	Rec take of coastal pelagic species, except market squid, by hook and line only	Harmful tidepooling. People using gear types for fishing for species other than coastal pelagics but gear type cannot assume intent. Makes enforcement difficult. Also safety concerns with surf casters into high use swim/surf area	Add, "except from shore" to prohibit surf hook and line	Yes	Surf fishing from shore causes safety concerns (hooks getting caught on surfers/swimmers). Still allows kayakers to fish for bait fish on way out, which was original intent				Take Allowance Change	

San Diego	Matlahuayl SMR	No Take	Harmful tidepooling. Kayak fishing. Caves are being defaced/ graffitied	Add place name (La Jolla) to traditional Kumeyaay name (Matlahuayl)	No	Keep Kumeyaay name only for Tribal acknowledgement. Would also add confusion between other La Jolla MPAs	More focused patrols on caves in La Jolla to address littering/defacement of MPA			Language Change	
San Diego	South La Jolla SMR	No Take	Most highly cited MPA. Poaching of lobster and offshore fishing. Harmful tidepooling. Challenges of parking and access (coastline related challenges due to sea level rise, climate disturbance)	No change	Yes	Focus on local management/outreach/enforcement	Need for more focus on tidepools (outreach/ enforcement). More staff for allied agencies to help enforce. Encourage city to maintain safe accessways and deal with coastal erosion problems. More education on marine mammal disturbance				
San Diego	South La Jolla SMCA	Rec take of pelagic finfish by hook and line only		No change	Yes						
San Diego	Famosa Slough No Take SMCA	No Take	Homeless encampments. Construction run-off. Dogs and cats disturbing birds	Change purple to red for outreach purposes	Yes	Easier to explain “no take” if consistent with red SMR				Other	
San Diego	Cabrillo SMR	No Take	Harmful tidepooling. Offshore boats but NPS unable to contact other than through megaphone	Work with Kumeyaay to rename MPA to traditional Kumeyaay name	Yes	Kumeyaay name exists for this location. Need to confirm spelling	Additional enforcement personnel/efforts are needed			Language Change	
San Diego	Tijuana River Estuary SMCA	Rec take of coastal pelagic species, except market squid, by hand held dip net. Commercial take of coastal pelagics, except market squid by round haul net	Difficult take regulations to interpret in the field and take by hand held dip net not really occurring, per Imperial Beach lifeguards	No change							

Cell: K138
Note: was not sure about this categorization
MPA Collaborative

February 8, 2024

California Fish and Game Commission
715 P Street, 16th Floor,
Sacramento, CA 95814

RE: Discussion Item 10 - Regulation change petitions (marine)

Dear President Sklar, Vice President Zavaleta & Commissioners,

We appreciate the opportunity to comment on the numerous petitions under consideration at the February meeting of the California Fish & Game Commission, and we offer the perspective of the many hundred thousand supporters of our organizations to the Commission. We express grave concerns regarding several of the proposals to eliminate fishing access along large stretches of the California coast and argue that many of the petitions lack adequate scientific support and documentation to substantiate their positions.

The Decadal Management Review (DMR) of the Marine Protected Area Network (MPA) has offered important insights for MPA managers to help shape the adaptive management of MPA regulations, including promising research that MPAs may increase biomass and provide resiliency against the impacts of a changing climate for some species. The intent of the Marine Life Protection Act (MLPA) and the stewardship of our coastal resources are of paramount importance to California's heritage. However, these laudable goals and conservation benchmarks should not preclude access to harvest coastal foods where state and federal fisheries managers have demonstrated robust and resilient fish stocks without any current threat of overfishing, nor for those species where targeted fishing and active management would benefit the overall ecosystem balance.

There are numerous, seemingly well-intentioned petitions currently before the Fish & Game Commission that seek to preserve California's coastal waters citing anthropogenic impacts to biodiversity and ecosystems such as pollution, rising sea temperatures, disease, development and overfishing. While we support the intent to safeguard our fish stocks, biodiversity, and ecosystem integrity, we strongly disagree with the all-or-nothing approach adopted by many of the petitioners who proffer the wholesale elimination of fishing access without adequate scientific rationale or the acknowledgement of regulatory mechanisms already in place such as those established by the Magnuson-Stevens Fishery Conservation and Management Act working through the Pacific Fisheries Management Council, National Oceanic and Atmospheric Administration (NOAA) Fisheries, the California Department of Fish and Wildlife (CDFW), the Fish & Game Commission, and the additional state/federal laws and agencies dedicated to this task. Simply put, many of the petitions referenced below seek to advance preservation at all costs, pushing for wholesale closures that circumvent the regulatory processes already in place, ultimately bludgeoning access for the diverse angling communities that have revered these coastal traditions for generations.

Anglers and consumptive users will often be the first and loudest voices to advocate for restrictions or even closures to ensure the sustainability of a fishery, as evidenced by the numerous fishing groups and organizations advocating for the closure of the 2023 salmon season following the data and dismal projections provided by the Pacific Fisheries Management Council and CDFW. However, a Californian

constitutional right to fish seems to stand in conflict with the presumption that restriction of access is permissible where there is a lack of scientific evidence or data to justify the closure. Section 1, Article 25 of the California Constitution states, "the people shall have the right to fish upon and from the public lands of the State and in the waters thereof," and the courts in re Quinn (1973) defined "public lands of the state" referenced in this article to include "access to fish in the inland streams and coastal waters of the state."

Shore fishing, diving/spearfishing, kayak/boat fishing and coastal gathering are low impact activities that reflect the broad spectrum of California's diverse community and constitute a valuable resource for individuals across the economic divide to access nature and provide food for their families. We encourage the Commission and MPA managers to consider the numerous communities that enjoy the state's many sustainable food resources when considering protections and recommendations that might unnecessarily exclude these groups. We feel that these considerations are in line with the California Natural Resources Agency's Outdoors for All initiative and its commitment in the Pathways to 30x30 document to "implement projects that do no further harm or pose unintended consequences to historically marginalized communities."[1] Specifically, we wish to highlight this issue with regards to the expansion of California's MPA network which restricts shore-based diving, foraging, and fishing access for all Californians – especially historically marginalized communities, communities of color and Native American tribes. From California's Constitutional Right to Fish:

> Anglers from historically marginalized communities may be less able to travel to fishing locations and are more likely to require shore access, as opposed to access from a boat. Anglers in communities like this need accessible shore-fishing, particularly given the importance of subsistence fishing in poorer communities. Moreover, fishing opportunities offer physical and psychological benefits to disadvantaged communities, not just access to fish as food.[2]

It is within this context that we urge the Commission to take the following actions with regards to the petitions they have received.

Petition 2023-14MPA: *Allow commercial take of red sea urchins in nine state marine conservation areas (SMCAs)*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-15MPA: *Reclassify three northern Channel Islands state marine reserves (SMRs) to SMCAs and allow take of highly migratory species, pelagic finfish, and/or coastal pelagic finfish*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation, but are encouraged by the proposal and the potential opportunity to gather more data on limited take MPAs and long-term MPA monitoring at the Channels Islands.

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[1] https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/30-by-30/Final_Pathwaysto30x30_042022_508.pdf

[2] Coats, Francis, and Karrigan Bork. "CALIFORNIA'S CONSTITUTIONAL RIGHT TO FISH." *Environmental Law*, vol. 51, no. 4, 2021, pp. 1085–147. *JSTOR*, https://www.jstor.org/stable/48647570. Accessed 22 Mar. 2023.

Petition 2023-16MPA: *Reclassify Stewarts Point and Bodega Head SMRs to SMCAs and allow commercial take of salmon.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-18MPA: *Modify allowed uses for four marine protected areas (MPAs) in Santa Barbara Channel and eliminate two special closures.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-19MPA: *Designate new "Chitqawi" SMCA near Morro Bay for California-Chumash co-management*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-20MPA: *Reclassify and rename Point Buchon SMR to "Chumash SMCA" for co-management with tribal take exemption.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-21MPA: *Modify Pyramid Point SMCA to remove recreational take of surf smelt and allow tribal take exemption for Tolowa Dee-ni' Nation.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-22MPA: *Define "rocky intertidal zone," add research, monitoring, restoration and education allowance, and clarify protections in several Orange County MPAs.*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation.

Petition 2023-23MPA*: Reclassify three SMCAs to SMRs, designate one new SMR in Monterey, and make various changes related to kelp restoration.*

We recommend the Commission deny this petition.

While the petitioner's intent to restore kelp forests and ecosystem integrity at tankers reef and in the surrounding waters is laudable, this broadly proscriptive petition would unnecessarily restrict access for anglers where there is no clear scientific rationale. In fact, the petitioner submitted a very similar petition seeking to close access for groundfish along a large stretch of the coast in this region in 2023 which the Department of Fish & Wildlife rejected citing a lack of scientific evidence to support the claim. We support the ongoing efforts to restore kelp forests through urchin culling and other means, however we oppose reclassifying these SMCAs to SMRs and the establishment of a new SMR in Monterey.

Petition 2023-24MPA: *Expand Laguna Beach no-take SMCA southward to border of City of Laguna Beach and modify Dana Point SMCA boundaries*

We recommend the Commission deny this petition.

We oppose this petition on the basis that it lacks scientific documentation or justification to eliminate fishing access in the proposed area. The petitioner argues primarily for administrative ease that the no-take closure be extended to the edge of city limits. During the implementation of the MLPA, MPAs were sited utilizing careful selection criteria based on habitat type, proximity from other MPAs, impact to communities and more. The petitioner argues that all beaches within the City of Laguna Beach should be no-take MPAs in order to streamline enforcement and that homeowners "feel that it is not equitable to have only the north and central beaches protected." It should be noted that the petitioner also states clearly in the Economic or Fiscal Impact section of the petition that "estimated resident property values gain an increase of 20% from proximity to a fully protected MPA" which may explain more robust support from the city and homeowners.

The petitioner also cites kelp forest health as justification for eliminating fishing access, however the 100 + page report included with the petition doesn't reference fishing pressure or boat activity with regards to kelp forest health and instead focuses on water temperature, nutrients, wave height, upwelling, rainfall and other stressors. As such, we recommend the Commission deny this petition since there is no scientific documentation to support its claims, and it would only negatively impact anglers who would be forced to travel further to reach fishing grounds.

Petition 2023-27MPA: *Reclassify a portion or all of Anacapa SMCA to an SMR to protect eelgrass*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation. We recognize the value of eelgrass beds for overall ecosystem health and habitat; however, it should be noted that many recreational anglers who target pelagic fish do not anchor and instead prefer to drift fish or troll instead which would have zero impact on the bottom habitat and eelgrass.

Petition 2023-28MPA: *Designate a new SMR at Point Sal, or designate as an SMCA with a tribal take exemption based on tribal consultation*

We recommend the Commission deny this petition.

While the petitioner takes time to identify the important habitat types, larval transport zones, and cultural significance of the Point Sal area, and they reference potential threats to the region from coastal development and industry, they fail to elaborate in any substantive way why fishing access should be removed from this wild and iconic central coast fishing destination. The petitioner states: "current [commercial] fishing in the proposed area is limited, likely due to its considerable distance from nearest port areas of Morro Bay and Santa Barbara." They also admit that they have no data or analysis with regards to recreational fishing and state, "our request to CDFW for recreational fishing data from this area was being processed at time of submission; we will evaluate the potential impact to recreational fishers and submit it to the state following receipt of the requested data."

A limited google search of "Point Sal fishing" also uncovers a large number of recreational fishing blogs and videos detailing the remote and adventurous hike to fish this area from a diverse population of anglers. In 2023 one blogger wrote, "had a great time hiking miles and miles and miles to fish Point Sal with Martin Mansera from Mansera Outdoors…It's such a remote location and so difficult to access, it

makes for a really rad adventure." Recreational fishing trips to the area by boat are also common, and fishing is noted in nearly every travel guide or city/county website that talks about visiting Point Sal.

Regarding access and disadvantaged communities, the petitioner writes, "the California Environmental Protection Agency identifies the adjacent city of Guadalupe as "disadvantaged" under CA Senate Bill 535, and their synthesis of environmental and socioeconomic indicators further reveals that Guadalupe – alongside Santa Maria and Lompoc – are underprivileged communities that experience significant cumulative impacts from pollution. Given these communities' close proximity to Point Sal, implementing an SMR at the proposed site could enhance access for disadvantaged populations to valuable coastal resources and fishing opportunities."

To justify this confounding claim that removing fishing access could somehow *enhance fishing opportunities* for disadvantaged communities, the petitioner cites a study of commercial lobster fishing and the concept of "spillover." They write, "California's MPAs have been shown to increase the biomass of fishery-targeted species and promote "spillover" into nearby coastal areas, benefitting nearby fishing grounds."

Spillover and the positive impacts to fisheries located in waters adjacent to MPAs are often referenced in association with the MPA network, and the limited, initial science has demonstrated some positive correlations with spillover of invertebrates like lobsters to adjacent fishing grounds in select study areas and commercial fishing for tuna in Hawaii. However, there remains an opportunity to further study this hypothesis and to promote scientific research that successfully documents spillover of targeted finfish across the MPA network in California. Some data from MPA monitoring along the Central California Coast indicated limited evidence of spillover from targeted finfish that were tagged and recaptured at a later point during the study period as evidenced from the Starr et al study: Variation in Responses of Fishes across Multiple Reserves within a Network of Marine Protected Areas in Temperate Waters:

> As of July 2014, a total of 251 individual tag recaptures have been reported (Table 8). Tagged fishes were recaptured by commercial and recreational hook-and-line fishermen, commercial trap fishermen, SCUBA divers, and during our fishing surveys. Of all the tagged fishes recapture and reported, 71% were recaptured in the same site and grid cell as they were released, and 22% of recaptured fishes were caught within the same site but outside the original grid cell where they were released. Only 18 fish, or 7% of the recaptured fishes, were recaptured beyond the boundaries of the MPA or REF site in which they were released. The mean net distance moved by eight of nine species recaptured was less than half the length of the MPAs we studied.[3]

While we do not seek to draw conclusions regarding the overall merits of spillover to adjacent fisheries from the results of one study, we do encourage additional research to evaluate the impacts that MPAs have on local fisheries and fisheries as a whole, especially within the context of varied siting and disparate habitat types evidenced across the MPA network. As the Forcada study indicated, "We conclude that spillover effects are not a universal consequence of siting MPAs in temperate waters and they are related to the distribution of habitats inside and around MPAs." (Forcada et al., 2009).

Due to the limited scientific understanding of spillover as it relates to the Marine Protected Area Network as a whole, especially with regards to finfish which would be the primary target of recreational shore and

[3] 4 Starr RM, Wendt DE, Barnes CL, Marks CI, Malone D, et al. (2015) Variation in Responses of Fishes across Multiple Reserves within a Network of Marine Protected Areas in Temperate Waters. PLOS ONE 10(3): e0118502. https://doi.org/10.1371/journal.pone.0118502

boat-based anglers at Point Sal, we disagree with the petitioner's logical assumptions and the argument as a whole. In fact, when considered in the context presented from the *Constitutional Right to Fish* article, the discussion is turned on its head entirely. "Anglers from historically marginalized communities may be less able to travel to fishing locations and are more likely to require shore access, as opposed to access from a boat. Anglers in communities like this need accessible shore-fishing, particularly given the importance of subsistence fishing in poorer communities."[4]

With the two large no-take SMRs located just South of this newly proposed MPA (Vandenberg SMR & Point Conception SMR) and Point Buchon to the North, it would seem the opportunities to fish and forage the coast for residents of Guadalupe, Lompoc and Santa Maria are already few and far between. In fact, in 2022 the City of Lompoc petitioned the Fish & Game Commission to allow for shore-fishing access along a ½ mile stretch of beach with in the Vandenberg SMR, citing a lack of access to historic fishing grounds for the local communities.

We share the petitioner's concerns regarding habitat disruption from off-shore energy production and the associated infrastructure, however, we note the likely establishment of the Chumash Heritage National Marine Sanctuary (CHNMS) designation which would effectively curtail any development or offshore energy production in this region. Planning for the CHNMS has included fishing access as a key component of the proposed designation.

As a result, we recommend the Commission deny this petition.

Petition 2023-29MPA: *Designate a new SMCA with a tribal take exemption for and co-management with Santa Ynez Band of Chumash Indians in Santa Barbara*

We recommend the Commission deny this petition.

We oppose the petitioner's request to designate a new, no-take SMCA in Carpinteria for several reasons. First, the petitioner argues that spacing and connectivity is a key concern in this location with the distance between the Campus Point and Point Dume SMCAs at 64 nautical miles (nm) instead of the recommended 54 nm to ensure ecological connectivity. When this request is examined within the broader context of MPA siting, it is clear that the target spacing between MPAs could be easily achieved by moving the Campus Point SMCA South or the Point Dume SMCA North, since both are located well-within the recommended 54nm from adjacent MPAs on either side.

Additionally, the petitioner cites the location as important nursery habitat for juvenile great white sharks as justification for establishing a no-take SMR. They write, "Research conducted in the Southern California Bight has found that fisheries bycatch is likely the main source of mortality for JWS." However, the article they cite to support this claim, John F. Benson et. al., discloses that for great white sharks they captured and tagged, "mortality risk was substantially greater off the coast of Baja, Mexico compared with California." Importantly, the research paper also states, "that incidental gillnet capture continues to be the primary source of mortality for juveniles. The lower mortality risk we documented in California waters suggests that full closure of gillnet fishing close to shore is a more effective management strategy than simply banning targeted fishing to reduce mortality risk due to bycatch." [5]

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[4] Coats, Francis, and Karrigan Bork. "CALIFORNIA'S CONSTITUTIONAL RIGHT TO FISH." *Environmental Law*, vol. 51, no. 4, 2021, pp. 1085–147. *JSTOR*, https://www.jstor.org/stable/48647570. Accessed 22 Mar. 2023.

[5] Benson JF, Jorgensen SJ, O'Sullivan JB, et al. Juvenile survival, competing risks, and spatial variation in mortality risk of a marine apex predator. *J Appl Ecol*. 2018; 55: 2888–2897. https://doi.org/10.1111/1365-2664.13158

As the petitioner is undoubtedly aware, gillnet fishing is banned in state waters and therefore the proposed MPA would have no impact on the gillnet fishery or likely the mortality risk to great white sharks.

The petitioner notes the location's popularity with recreational lobster divers and the likely opposition from stakeholders who would oppose the additional loss of access. The mortality risk to great white sharks from the recreational lobster fishery is zero, similar to the risk from spearfishing, yet the petitioner seeks to eliminate access entirely without providing any scientific rationale for the closure. As a result, we request that the Commission deny this petition.

Petition 2023-31MPA: *Reclassify Drakes Estero SMCA to an SMR and combine with Estero de Limantour SMR as a single SMR:*

We recommend referring this petition to the Department of Fish & Wildlife for review and recommendation but encourage the Commission to maintain access for clamming unless there is a clear threat to the fishery or surrounding ecosystem.

It is worth noting that the National Park Service mentions in their comment letter that the area is now Congressionally Designated Wilderness and that "recreational take of shellfish appears to be very rare, [and] requires long kayak trips in wilderness area." Just because something is difficult doesn't mean it should be illegal.

Petition 2023-32MPA: *Reclassify Duxbury Reef SMCA as an SMR and expand northern and southern boundaries*

We recommend that the Commission deny or refer this petition to the Department of Fish & Wildlife for review and recommendation but emphasize maintaining fishing access for local communities at Duxbury Reef. The vast majority of complaints regarding Duxbury reef are related to enforcement and compliance, rather than a scientific justification for eliminating access. Shore fishing is an important past-time for the diverse communities that comprise the North Bay Area, and removing access to a popular fishing destination should not be justified simply based on the actions of a few bad apples.

Petition 2023-33MPA: *Expand the boundaries of five SMRs and one SMCA, and designate a new SMR off Pleasure Point, in Santa Cruz*

We recommend that this petition be denied or referred to the Department of Fish & Wildlife for review and recommendation due to its broad scope and complexity. The petitioner seeks to enhance protections for kelp forests, but does so with an overly broad brush. Rather than advocating for reducing fishing pressure for predators of kelp grazers, like lobster and sheepshead, the petition advocates for the closure of all fishing, including the harvest of grazer species like urchins that have been documented to decimate kelp forests.

The petitioner argues that eliminating fishing pressure within the proposed MPA areas would somehow bolster kelp populations, but the claim is not well documented by scientific research in this petition. A noteworthy case study, by comparison, is the ongoing Tanker's Reef kelp restoration project, where volunteers have been culling purple urchins within study plots and tracking kelp recovery within the study area and a control site nearby. The initial data for the last three years shows a clear correlation between the removal of purple urchins and kelp recovery in the study plot with no kelp recovery in the adjacent control where urchins were not removed. Fishing is permitted in the Tanker's reef area, however, in adjacent MPA's that have not permitted active restoration and where fishing is not allowed, urchin barons persist and kelp recovery remains minimal.

Kelp forest health and resiliency is a complex and multi-variable equation that can be impacted by numerous factors including water temperature, disease, pollution, algal blooms, wave energy, commercial harvest and more. We support efforts to restore kelp forests across the coast and recognize the role they play in the overall ecosystem health of fisheries, especially the abalone fishery that remains closed until 2026. We urge caution, however where broad fishing closures are enacted in the attempt to solve a problem that requires a more nuanced and carefully crafted multidisciplinary approach.

It should also be noted that the petitioner indicates support for recreational hook and line fishing and spearfishing as an acceptable alternative in several of the MPAs referenced in the petition.

Petition 2023-34MPA: *Reclassify Point Buchon SMCA to an SMR and modify take at Farnsworth Onshore and Offshore SMCAs to only allow recreational spearfishing.*

We recommend that the Commission deny this petition and we emphasize the substantial impacts to current fishing access. The petitioner argues that since the salmon season was closed in 2023 it will likely be closed in perpetuity, which would justify eliminating salmon and albacore fishing access at the Point Buchon SMCA. Salmon populations often decrease during drought years and can rebound with increased precipitation or water allocation as was the case in 2008 and 2009 when the fishery was closed and then reopened. We are cautiously optimistic that the salmon numbers will once again bounce back following the increased precipitation received over the past two years.

In the draft Pathways to 30x30 document, the CNRA writes: “It should be noted that limited-take State MPAs provide an excellent model for other jurisdictions looking to balance biodiversity conservation with sustainable well-managed commercial and recreational fishing.” We feel that reclassifying the Point Buchon SMCA as an SMR and eliminating fishing in this area would be inappropriate; however, we support any attempts to improve enforcement and compliance with existing regulations.

Furthermore, the proposal to modify take at Farnsworth Onshore and Offshore SMCAs would disproportionately impact a broad variety and collection of user groups who may not be physically able or inclined to spearfish. For this reason and the lack of concrete scientific data to justify the additional restrictions, we recommend the Commission deny this petition.

Sincerely,

Devin O’Dea
Backcountry Hunters & Anglers

Rachel Fischer
National Marine Manufacturers Association

Wayne Kotow
Coastal Conservation Association California

James Stone
Nor-Cal Guides & Sportsman’s Association

Keely Hopkins
Congressional Sportsman’s Foundation

Larry Phillips
American Sportfishing Association

February 8, 2024

California Fish and Game Commission
715 P Street, 16th Floor,
Sacramento, CA 95814

RE: Discussion Item 10 - Regulation change petitions (marine)

Dear President Sklar, Vice President Zavaleta & Commissioners,

As an organization dedicated to ensuring our North American heritage of hunting and fishing in a natural setting with over 350,000 supporters, Backcountry Hunters & Anglers expresses serious concerns regarding several of the petitions currently before the California Fish & Game Commission that would eliminate fishing access along large stretches of the California coast.

The intent of the Marine Life Protection Act (MLPA) and the stewardship of our coastal resources are of paramount importance to California's heritage. However, these laudable goals and conservation benchmarks should not preclude access to harvest coastal foods where state and federal fisheries managers have demonstrated robust and resilient fish stocks without any current threat of overfishing, nor for those species where targeted fishing and active management would benefit the overall ecosystem balance.

There are numerous, seemingly well-intentioned petitions currently before the Fish & Game Commission that seek to preserve California's coastal waters citing anthropogenic impacts to biodiversity and ecosystems, such as pollution, rising sea temperatures, disease, development and fishing. While we support the intent to safeguard our fish stocks, biodiversity, and ecosystem integrity, we strongly disagree with the all-or-nothing approach adopted by many of the petitioners who proffer the wholesale elimination of fishing access without adequate scientific rationale.

Simply put, many of the petitions seek to advance preservation at all costs, pushing for wholesale closures that circumvent the regulatory processes already in place, ultimately bludgeoning access for the diverse angling communities that have revered these coastal traditions for generations.

Shore fishing, diving/spearfishing, kayak/boat fishing and coastal gathering are low impact activities that reflect the broad spectrum of California's diverse community and constitute a valuable resource for individuals across the economic divide to access nature and provide food for their families at the same time. We encourage the Commission and MPA managers to consider the numerous communities that enjoy the state's many sustainable food resources when considering protections and recommendations that might unnecessarily exclude these groups.

It is within this context that we urge the Commission to deny those petitions (outlined in our detailed letter to the Commission on 2/1/24) that would unnecessarily erode our longstanding coastal fishing and foraging traditions.

Date	Prefix	First	Last	Title	Address	City	State	Zip	Country	Action Taken
2024-02-09 00:56:52.913		George	Day						US	Petition Signed
2024-02-09 00:42:11.303		Mark	Ginsberg						US	Petition Signed
2024-02-09 00:28:34.06		Ryan	Murray						US	Petition Signed
2024-02-09 00:14:18.207		Vincent	Doyle						US	Petition Signed
2024-02-08 23:10:18.873		Steve	Rodriguez quijano						US	Petition Signed
2024-02-08 22:52:30.193		Darrin	Gambelin		[redacted]	San Mateo	CA	[redacted]	US	Petition Signed
2024-02-08 22:33:50.663		Mark	Sanders						US	Petition Signed
2024-02-08 21:30:32.08		Tim	McPherson						US	Petition Signed
2024-02-08 21:26:32.267		Donna	Butler						US	Petition Signed
2024-02-08 21:09:16.39		Julian	escalera						US	Petition Signed
2024-02-08 18:30:10.123		Chris	DeHaven						US	Petition Signed
2024-02-08 18:15:57.91		Daniel	Marthey						US	Petition Signed
2024-02-08 18:04:03.19		Matthew	DeAmico						US	Petition Signed
2024-02-08 17:05:41.52		Tim	Harris						US	Petition Signed
2024-02-08 16:04:04.57		Dana	Wilburn						US	Petition Signed
2024-02-08 14:33:46.347		Robert	Del secco						US	Petition Signed
2024-02-08 14:26:31.143		Domingo	Escamilla III						US	Petition Signed
2024-02-08 13:27:58.967		Tim	Martin						US	Petition Signed
2024-02-08 13:24:19.56		Kyle	Pruett						US	Petition Signed
2024-02-08 12:43:45.757		John	Mattimoe						US	Petition Signed
2024-02-08 11:50:07.073		Robert	Moore		[redacted]	Wake Forest	NC	[redacted]	US	Petition Signed
2024-02-08 11:41:11.183		Gage	Smolko						US	Petition Signed
2024-02-08 11:16:29.523		Jacob	Pickett						US	Petition Signed
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2024-02-08 09:44:48.333		Alin	Iacob						US	Petition Signed
2024-02-08 09:41:02.807	Mr.	Stone	Miller		[redacted]	Indianapolis	IN	[redacted]	US	Petition Signed
2024-02-08 09:02:19.913		John	Logan		[redacted]	Chico	CA	[redacted]	US	Petition Signed
2024-02-08 08:24:12.98		Andrew'	Collins						US	Petition Signed
2024-02-08 07:29:39.647		Michael	Chastain						US	Petition Signed
2024-02-08 01:25:33.743		Brian	Crawford						US	Petition Signed
2024-02-08 01:04:24.787		Kris	Green						US	Petition Signed
2024-02-08 01:03:22.4		Lance	Bauer						US	Petition Signed
2024-02-08 00:46:49.423		Reid	Coultas						US	Petition Signed
2024-02-08 00:23:25.5		Wesley	Vetter		[redacted]	Corte Madera	CA	[redacted]	US	Petition Signed
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2024-02-07 22:23:34.157		Kyle	Carroll						US	Petition Signed
2024-02-07 21:59:09.033	Mr.	Ed	Fiedler		[redacted]	Austin	TX	[redacted]	US	Petition Signed
2024-02-07 21:33:02.84		Wes	Smith						US	Petition Signed
2024-02-07 21:31:05.667		Edgar	Albarracin						US	Petition Signed
2024-02-07 20:52:30.057		Jeffrey	White						US	Petition Signed
2024-02-07 20:00:12.467		Stephen	Duke						US	Petition Signed
2024-02-07 19:56:31.663		Collin	Ewing						US	Petition Signed
2024-02-07 18:59:25.567		Joshua	Ott						US	Petition Signed
2024-02-07 18:23:11.943		Mary Ann	Viveros		[redacted]	Mayfield Hts.	OH	[redacted]	US	Petition Signed
2024-02-07 18:18:48.657		David	Valle						US	Petition Signed

2024-02-07 16:52:22.8	Mr.	Robert	Mowen		[redacted]	Clear Spring	MD	[redacted]	US	Petition Signed
2024-02-07 16:43:06.197		Christopher	Morrison						US	Petition Signed
2024-02-07 16:41:02.873		Timothy	Crush						US	Petition Signed
2024-02-07 16:38:30.61		Bryan	Thompson						US	Petition Signed
2024-02-07 16:24:15.533		Ryan	McWilliams						US	Petition Signed
2024-02-07 16:20:00.137		Rick	Ammerman						US	Petition Signed
2024-02-07 16:13:52.693	Mr.	Bruce	Williams		[redacted]	Bandon	OR	[redacted]	US	Petition Signed
2024-02-07 15:56:35.417		Charles	Pugh						US	Petition Signed
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2024-02-07 15:33:15.917		Robert	Brusavich						US	Petition Signed
2024-02-07 15:16:51.377		Donald	Ahlschlager		[redacted]	Underwood	MN	[redacted]	US	Petition Signed
2024-02-07 15:16:24.077	Mr.	Daniel	Fernandez		[redacted]	Salinas	CA	[redacted]	US	Petition Signed
2024-02-07 15:15:28.717		Gary	Applebee						US	Petition Signed
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2024-02-07 13:50:21.237		Clint	Frady		[redacted]	Reno	NV	[redacted]	US	Petition Signed
2024-02-07 13:40:31.47		Jason	Bickford						US	Petition Signed
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2024-02-07 13:31:45.813		Sam	Landrum		[redacted]	Sacramento	CA	[redacted]	US	Petition Signed
2024-02-07 13:30:19.807	Mr.	Shawn	Hauptman		[redacted]	Sacramento	CA	[redacted]	US	Petition Signed
2024-02-07 13:29:40.317		John	Cooper						US	Petition Signed
2024-02-07 13:26:50.6	Ms.	Rochelle	Gravance		[redacted]	Columbus	MT	[redacted]	US	Petition Signed
2024-02-07 13:26:29.103		Jeremy	Olmscheid		[redacted]	Albany	MN	[redacted]	US	Petition Signed
2024-02-07 13:23:29.913		Zachary	Brady						US	Petition Signed
2024-02-07 13:21:14.497	Mr.	Jeremy	Meshew		[redacted]	Gobles	MI	[redacted]	US	Petition Signed
2024-02-07 13:19:49.873		John	Eggers						US	Petition Signed
2024-02-07 13:18:18.17		Ken	Porter						US	Petition Signed
2024-02-07 13:18:01.783		Jessica	Valentín						US	Petition Signed
2024-02-07 13:14:36.687	Mr.	James	Childress		[redacted]	Morgantown	KY	[redacted]	US	Petition Signed
2024-02-07 13:06:01.387		Nick	Neverisky						US	Petition Signed
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2024-02-07 01:13:14.493		Tyler	Reist						US	Petition Signed
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2024-02-06 23:21:13.883		Ernest	Almaraz						US	Petition Signed
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2024-02-06 16:07:35.737		Robert	Leih						US	Petition Signed
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2024-02-06 15:57:15.343		Chad	Mahalich						US	Petition Signed
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2024-02-06 15:55:20.943		Christine	Van peursem						US	Petition Signed
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2024-02-06 09:20:42.84		Matthew	White						US	Petition Signed
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2024-02-06 08:20:58.27		Jamie	Morley		[redacted]	Bishop	CA	[redacted]	US	Petition Signed
2024-02-06 03:37:38.083		Seth	Pettit						US	Petition Signed
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2024-02-05 23:50:53.107		Bob	Nelson						US	Petition Signed
2024-02-05 23:27:03.35	Mr.	Christopher	Reiger		[redacted]	Santa Rosa	CA	[redacted]	US	Petition Signed
2024-02-05 23:20:30.843		Fredrick	Robinson						US	Petition Signed
2024-02-05 23:18:20.8		Michael	Snyder						US	Petition Signed
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2024-02-05 22:57:33.25		jeremy	mcmillin						US	Petition Signed
2024-02-05 22:56:46.81		Stan	Perry		[redacted]	San Diego	CA	[redacted]	US	Petition Signed
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2024-02-05 22:44:52.897		Paul	Rodriguez						US	Petition Signed
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2024-02-05 22:26:53.147		Mitchell	Riddle						US	Petition Signed
2024-02-05 22:14:29.21		Michael	Schubert		[redacted]	San Anselmo	CA	[redacted]	US	Petition Signed

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2024-02-05 21:44:00.633		Jeffrey	Reed						US	Petition Signed
2024-02-05 21:33:06.14		Jim	Velazquez		[redacted]	San Diego	CA	[redacted]	US	Petition Signed
2024-02-05 21:21:19.297		Reid	Lamson						US	Petition Signed
2024-02-05 21:12:35.05	Mr.	Nick	Zagaris		[redacted]	Auburn	CA	[redacted]	US	Petition Signed
2024-02-05 21:00:30.373		Mike	Gorski						US	Petition Signed
2024-02-05 20:55:46.087		Barbara	Blackamore		[redacted]	Yorba Linda	CA	[redacted]	US	Petition Signed
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2024-02-05 18:32:56.35		Michael	Davis		[redacted]	Altadena	CA	[redacted]	US	Petition Signed
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2024-02-05 17:50:21.377		Taylor	Dahlke						US	Petition Signed
2024-02-05 17:47:40.317		Albert	LaShell						US	Petition Signed
2024-02-05 17:43:23.39		Brian	Dotterer						US	Petition Signed
2024-02-05 17:35:29.003		Philip	Benson						US	Petition Signed
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2024-02-05 16:56:27.427		Eric	Hanson						US	Petition Signed
2024-02-05 16:55:56.143		Evan	Davis						US	Petition Signed
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2024-02-05 16:46:26.21		SCOTT	EVELD						US	Petition Signed
2024-02-05 16:44:24.037		Ryan	Javier						US	Petition Signed
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2024-02-04 15:11:37.17		Oliver	Heffron						US	Petition Signed
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2024-02-03 22:36:47.323		Kyle	Rempe						US	Petition Signed
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2024-02-03 19:17:18.01		Sterling	Coberly						US	Petition Signed
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2024-02-03 09:10:51.607		Ralph	Puett						US	Petition Signed

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2024-02-03 03:29:29.203		Ben	Carter						US	Petition Signed
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2024-02-03 02:50:01.12		David	Modena						US	Petition Signed
2024-02-03 02:12:16.923		Andrew	Law						US	Petition Signed
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2024-02-02 14:09:23.547		Mike	Costello						US	Petition Signed
2024-02-02 14:03:34.583	Mr.	Hunter	Miller		[redacted]	Kuna	ID	[redacted]	US	Petition Signed
2024-02-02 14:02:35.91		Jordan	Germyn						US	Petition Signed
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2024-02-02 13:55:22.597		Micah	Dungey						US	Petition Signed
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2024-02-02 13:48:43.423		Jerry	Chang						US	Petition Signed
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2024-02-02 13:47:17.947		Christopher	James						US	Petition Signed
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2024-02-02 13:45:40.09		James	Killiany						US	Petition Signed
2024-02-02 13:40:12.057		Richard	Owens						US	Petition Signed
2024-02-02 13:37:41.607	Mr.	Blane	Markham		[redacted]	Carmel	CA	[redacted]	US	Petition Signed
2024-02-02 13:36:49.903		Connor	Weber						US	Petition Signed
2024-02-02 13:35:29.397		Logan	Gillingham						US	Petition Signed
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2024-02-02 13:15:13.017		Valerie	Bednarski						US	Petition Signed
2024-02-02 13:14:01.07		Elijah	Black						US	Petition Signed
2024-02-02 13:12:08.623		Philip	Adornato						US	Petition Signed
2024-02-02 13:10:44.163		owen	shapiro						US	Petition Signed
2024-02-02 13:10:37.263		Steve	Dolan						US	Petition Signed
2024-02-02 13:09:39.617		Nick	Garcia						US	Petition Signed
2024-02-01 21:14:07.19		Keynan	Hobbs						US	Petition Signed
2024-02-01 19:52:19.6		Allen	Noren						US	Petition Signed
2024-02-01 19:31:26.837		Devin	O'Dea						US	Petition Signed

From: California Fishermens Resiliency Association <californiafishermensresiliency@gmail.com>
Sent: Wednesday, July 3, 2024 06:44 PM
To: FGC <FGC@fgc.ca.gov>
Cc: [redacted] Steve Scheiblauer <[redacted]>; Dave Colker <[redacted]>; Jake Mitchell <[redacted]>; [redacted]
Subject: MPA Petitions Support/Object

California Fish and Game Commission
PO Box 944209
1416 Ninth Street Suite 1320
Sacramento, California 94244-2090

July 3, 2024

Re: MPA Petitions/Support/Object

Commissioners:

The California Fisherman's Resiliency Association (CFRA) expresses its support for the following Marine Protected Area (MPA) petitions:

2023 - 14 MPA
2023 - 15 MPA
2023 - 16 MPA
2023 - 18 MPA
2023 - 30 MPA

Our support is based on research conducted by the University of Washington (sustainable fisheries- us.org) which exactly states that MPA's have no positive affect on threats to marine life posed by ocean acidification, global warming, coastal development, terrestrial and urban run-off and human pollution of the world environment. "Recent reviews of the extensive MPA network in California have concluded there is no evidence for a regional increase in biodiversity, or targeted fish abundance, nor is there evidence for MPA's providing climate resiliency"

We provide no support for the following MPA petitions:

2023 - 19 MPA
2023 - 20 MPA
2023 - 21 MPA
2023 - 22 MPA
2023 - 23 MPA
2023 - 24 MPA
2023 - 25 MPA
2023 - 26 MPA
2023 - 28 MPA
2023 - 29 MPA
2023 - 31 MPA
2023 - 32 MPA
2023 - 33 MPA
2023 - 34 MPA

Thank you for this opportunity to comment.

Ken Bates, Executive Director
California Fishermen's Resiliency Association Member Associations

Crescent City Commercial Fishermen's Association
Trinidad Bay Fishermen's Association
Shelter Cove Fishermen's Preservation, Inc.
Salmon Troller's Marketing Association of Noyo
Bodega Bay Commercial Fishermen's Association
San Francisco Crab Boat Owners Association
Half Moon Bay Commercial Fishermen's Association
The Alliance of Communities for Sustainable Fisheries
Commercial Fishermen of Santa Barbara
Santa Cruz Commercial Fishermen's Association
Pacific Coast Federation of Fishermen's Associations

Cc: Dave Colker
Peter Halmay
Steve Scheiblauer
Jake Mitchell

From: Corie Erskine <[redacted]>
Sent: Tuesday, November 5, 2024 10:32 PM
To: FGC <FGC@fgc.ca.gov>
Subject: Point Sal SMR 2023-28MPA & MPA 2023-19MPA Public Comment PSLCFA

Hello,

Please see the attached comment from the Port San Luis Commercial Fishermen's Association in Avila Beach, CA concerning the agenda items below.

Point Sal SMR 2023-28MPA

MPA 2023-19MPA

Thank you,

Corie Erskine

Board Member, PSLCFA

PORT SAN LUIS COMMERCIAL FISHERMEN'S ASSOCIATION
P.O. BOX 513
AVILA, CA 93424

Board of Directors:

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JUSTIN FRANKLIN

Attn: California Fish & Game Commission's Marine Resources Committee (MRC)
RE: Point Sal SMR 2023-28MPA (termed SMCA)
SUBJECT: PSLCFA's Opposition to Proposed SMR
Oct. 26, 2024

The Port San Luis Commercial Fishermen's Association (PSLCFA) was established in 1964 as a 501(c)6 nonprofit organization. PSLCFA members generate millions of dollars in local community revenue each year. We currently have 75 registered members. However, our unregistered numbers greatly exceed 100 as fishing in our community continues to be a family affair, passing along this time-honored tradition to future generations. Our PSLCFA members participate in groundfish, coastal pelagic species, halibut, crab, highly migratory species such as albacore, salmon, and/or hagfish fisheries, both commercially and recreationally (outside our association). The PSLCFA represents a significantly vested interest in fishery activities on the California coast. Our central coast fishermen land the most live fish on the West Coast. At least 65% of fishermen in our area rely on the live fish market for their main income source, fishing mostly through nearshore groundfish permits inside 3 miles with the primary take method being hook and line.

Contrary to the petitioner claims, the proposed SMR around Point Sal in central California poses a threat to the livelihood of California fishermen specifically the members of the PSLCFA. The area identified for proposal encompasses fruitful fishing grounds where our members' harvest activities occur.

The PSLCFA urges the California Fish and Game Commission's Marine Resources Committee to consider the dire consequences to our local commercial fishermen from enacting a Point Sal SMR. While the petition states the data from the overlapping commercial fishing blocks contributes to 1.1% of the central coast's landings by value, it fails to look at the local effects that 1.1% actually has. In the same dataset timeframe on the MFDE, 2012-2022, the local port to the MPA, Port San Luis/Avila had 28.12% of its commercial revenue alone come from the overlapping blocks, 631 and 632. More specifically 25.92% of the port's groundfish revenue

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and 57.79% of the port's crab revenue based on the dataset referenced. Further, upon speaking with our members, we have identified that many members have inadvertently misclassified their reported catch block which should have fallen under 631 and 632. Therefore, due to this, we anticipate the catch rate and revenue accumulated from this area to be significantly larger than shown in the dataset used for justification of this SMR proposal. Our members are making adjustments for future landings, but this will not be reflected in historical data and should be considered in this SMR's determination.

Further, disproportionate management such as enacting the proposed Point Sal SMR will undoubtedly result in the systemic dismantling of fishery culture on the California Coast and the economic ramifications will be felt far beyond.

The west coast fishing industry and coastal community businesses who normally benefit from derived demand are already facing economic decline directly related to the regulatory restrictions limiting the Dungeness crab season by 3 months and the inadvertent creation of a uniform west coast season opener date. The PFMC's decision for salmon season closures the last two years exacerbated this downward trend. The fishermen who would normally depend on one or both of those fishers for their livelihood have now expanded into the sablefish, groundfish, and albacore fisheries or the recreational sector in order to compensate for their lack of income. A preexisting high level of market competition from unregulated seafood importers and aquaculture production already presents downward pressure on the price of fish. This shift in the dedicated labor harvesting local wild fish has led to an influx of fish supply and market saturation wherein the price of fish sold off the boat has plummeted creating instability in other fisheries. Once again, in order to compensate for their income deficiency at this lowered price of goods, fishermen have been forced to increase catch volumes in these alternative fisheries. The government possess the power to waive permit fees, temporarily suspend fishery related taxes, issue financial relief, subsidize marine fuel, and/ or limit imported seafood from countries known for practicing unsustainable fishing but there has been zero regulatory reprieve to assist fishermen through this hardship. Closure of nearshore fruitful fishing grounds imposed by this SMR will place further unnecessary pressure on our local industry. By limiting This unfairly confines the potential income of fishermen involved in the commercial and recreational fisheries on the coast of California. The proposed SMR will especially harm the PSLCFA as many of our members are relatively new fishermen who have over $100k invested in assets and depend on this location to support their sole income.

Due to the already negatively impacted state of fisheries our fishermen frequently venture along the California Coast specifically North to the Morro Bay area and just South to Santa Barbara. Therefore, we stand in solidarity and brotherhood with the Morro Bay Commercial

PORT SAN LUIS COMMERCIAL FISHERMEN'S ASSOCIATION
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Fisherman's Association and the Santa Barbara Commercial Fisherman's Association against further MPA creation in this coastal region especial, MPA 2023-19MPA. The commercial blocks overlapping the proposed SMCA account for 6.2% of Morro Bay's landing revenue alone. More specifically, these blocks represent 25% of the area's squid landings, 8.8% of the groundfish landings, and 15% of the area's salmon landings per the MFDE. Closing this area to exclusively commercial fishermen would only continue to reduce fishable area for a shrinking industry and offer no benefits of the so-called "spillover effect" to restricted fisheries due to the still-allowed recreational take. There is zero public benefit which would come from MPA closures and restrictions but the impact to the livelihood of fishermen families would be devastating.

We urge you to question the policy methodology of MPA's along our coast- are these protective measures truly addressing a threat worth sacrificing the livelihood of us hardworking Americans?

Thank you for your time and consideration!

Sincerely,

Chris Pavone
President, PSLCFA

From: Matthew Bond <[redacted]>
Sent: Monday, January 19, 2026 8:11 AM
To: FGC <FGC@fgc.ca.gov>
Cc: Tonie Bangos <[redacted]>; Devin O'Dea <[redacted]>; Christopher Killen <[redacted]>
Subject: Comment Regarding MPA Petitions for the February 11-12, 2026 Commission Meeting

Dear members and staff of the California Fish and Game Commission,

Please find attached our letter representing the voice of a broad coalition of individuals, organizations, businesses, and scientists with opinions and related rationale on each of the Bin 2 MPA petitions.

Thank you for your time and service,

Matt Bond
Allwaters Protection and Access Coalition

January 2026
Coalition Letter on Bin 2 MPA Petitions

January 2026
Coalition Letter on Bin 2 MPA Petitions

To the California Fish and Game Commission (FGC) and Department of Fish and Wildlife (CDFW),

This letter serves as a joint comment, representing a mass consensus reached by the undersigned groups and individuals representing tens of thousands of stakeholders from recreational, commercial, and scientific backgrounds on all of the Bin 2 MPA petitions. While some of us may submit our own individual comments in addition, or have already, we would like the FGC and CDFW to understand that this diverse community of statewide stakeholders are all united regarding the following comments on these petitions. We all would like to share our common beliefs outlined in the below letter to you as this united group. With the adaptive management process of our MPA network underway, we ask to please take the below input deeply into account when determining the outcomes of the following bin 2 MPA petitions.

Petition2023-14MPA – Accept

Petition 14 proposes the allowance of commercial urchin take inside of a group of SMCAs that already have allowable limited-take restrictions, with the exception of one no-take SMCA. This petition has not been amended since submission. We believe this petition's rationale to have enough merit to warrant its acceptance in part or in full.

At a time where there are mass interests in helping kelp forests regrow, allowing sea urchin take in areas already partially open to other fisheries is a minimally invasive step we can take, especially in SMCAs that already allow some forms of take. By being allowed to harvest and remove sea urchins that are currently protected in these areas, we allow the kelp the chance to grow back. While we cannot locally control global factors affecting kelp growth such as water temperature or swell meaningfully, we can still promote regrowth of kelp by being allowed to at least remove one of kelp's largest predators, the sea urchin.

Per SeaSketch, we may accept this petition whilst also maintaining the same relative level of protection (LOP) in six of the eight total SMCAs in the proposal: Double Cone, Salt Point, Stewarts Point, Sea Lion Cove, Naples, and Anacapa. This means any MPA connectivity benefits will be maintained as is in the current network. For the Point Dume and Point Vicente SMCAs, while the MPA LOP does drop, we believe the allowance of sea urchin take in these SMCAs will greatly benefit the entire area through restored kelp growth, and additional workable area for local urchin divers. However, we understand if a loss in connectivity for these two areas is something the commission is against, that just these two MPA be excluded. At a minimum, this petition should be granted for the SMCAs where the network as a whole does not lose any existing connectivity benefits.

January 2026
Coalition Letter on Bin 2 MPA Petitions

Petition2023-15MPA-AM2 – Accept

Petition 15 proposes allowing limited take of pelagic or highly migratory species at three joint State-Federal MPAs at the Channel Islands. The petition was amended twice, and proposes several possible options for limited-take of pelagic finfish or highly migratory species (HMS). The petition brings forward three gear types: hook-and-line, spear, and harpoon swordfish; additionally, it includes possible nearshore-offshore MPA options to mitigate bycatch in the more biodiverse nearshore areas and maintain high MPA LOPs for network connectivity. While it is up to the commission and department to determine what the best combination of choices may be, we all believe this petition should be accepted under a preferred option that retains a high LOP for these MPAs, maintaining existing ecosystem level protection/connectivity, that consists of an offshore SMCA and nearshore SMCA or SMR.

The petition is founded on a longstanding scientific basis and MLPA goals that the MPAs in our network are primarily intended to benefit our nearshore waters and non-pelagic species the most. This has been established since the MLPA MPA Master Plan (MMP) in 2008 where MPA benefits to pelagic species were explained to be weak at best, rather focusing the network toward non-pelagic species that benefit the most from MPAs per the MMP documents. This led to the coastal network outside of the Islands process allowing some form of pelagic access in over 40% of our existing MPAs, and no-take in the remaining 60%. Of the currently 60% of MPAs that are no-take, most areas are nearshore, cover predominantly shallow water, and would not provide much pelagic benefits if they were even partially open. The approximately remaining 40% of the network that is limited take, most of which is pelagic take, are set in areas where pelagic effort is reasonable enough to avoid any nearshore or bottom interactions, or does not allow hook-and-line, just spear.

This sets a clear precedent, based on the science, that we can allow reasonable pelagic fishing access in the areas where it makes sense to allow it, and fully protect areas where pelagic fishing is less realistic or interferes too much with nearshore areas. This precedent was again reiterated in the 2016 MMP in a regional objective that explicitly states to allow for forms of pelagic take across the network in all bioregions, something the coastal MPA phases included but the Channel Islands network specifically lacks. The commission then upheld this mass precedent in 2020 when it denied a petition to create an MPA for white sharks, citing specifically that MPAs in our network are not meant for highly migratory or pelagic species, they are for ecosystem level protections, which can still exist in pelagic allowed MPAs. We simply ask that this precedent continue to be upheld for the MPAs that can reasonably allow for pelagic or HMS take and network maintain connectivity. This has no better use case to be applied than at the Channel Islands. That region of the network was designated prior to all of the primary MPA guiding documents, covers mostly offshore waters, and provides the least pelagic access of all the MPA designation regions, a clear case of adaptive management.

Because the Channel Islands MPA network is the oldest region in the modern network, designated now over 20 years ago in 2002, it pre-dates the coastal MLPA implementation phases, the MLPA LOP frameworks, both MPA Master Plans, and all other frameworks and processes that established this pelagic allowance elsewhere during the 4 coastal phases. In the early 2000s during the Channel Islands process, the primary concerns driving the island MPAs involved groundfish species and recovering their overfished populations. This fact was a main driver in justifying the federal sections of the island MPAs, as the federal expansions cover deep water rocky bottom or reefs where groundfish frequent. Today, federal outlooks of no-take MPAs are almost non-existent. With the exception of the Channel Islands, federal protected areas off the west coast only protect non-pelagic bottom dwelling species (groundfish), and allow pelagic fishing access, aligning exactly to what the petition proposes.

We believe this to be an adaptive management case of modernizing MPAs that predate all guidance documents, and updating them to better align to these well established frameworks in the same way the rest of the network already has. In the case of pelagic access, this shift is clearly seen as the more-modern coastal MPAs allow significantly more pelagics access (40%), compared to the Channel Islands MPAs (3%). In the case of The Footprint MPA specifically, it is the only MPA in the State that is disconnected from land, is entirely deeper than 50m, and has no limited take allowance for pelagics. The Channel Islands MPAs as a whole are justifiably the most equipped to handle pelagic allowance in them, especially offshore, due to the depths covered allowing a massive buffer between pelagic fisheries in the mid to upper water column and non-pelagic fisheries on the bottom. Any take beyond State waters in the federal portions of these MPAs would affect the nearshore region even less than already existing State pelagic allowances present in the current coastal network. Most of the federal portions of these MPAs are well over 1000 feet in depth, and in some cases over 4000 ft in depth.

Per SeaSketch, LOP tiers from the original MLPA state pelagic take maintains MPA connectivity due to the take allowance’s high LOP in offshore waters. At the islands specifically this is seen as only allowing hook-and-line take in waters deeper than 50 meters (164ft), with harpoon or spear gears allowed anywhere due to their high selectivity and lack of any bycatch. A high LOP can be maintained and connectivity still upheld if the petition is accepted with the proposed “nearshore” SMCAs or SMRs at Gull Island and Santa Barbara Island that restrict nearshore hook-and-line, along with any SMCA option in The Footprint and the proposed “offshore” sections of Gull Island and Santa Barbara Island. With all of this precedent and SeaSketch LOP information in mind we believe there is more than sufficient rationale, federal and state evidence, and MLPA/MMP support to allow for this adaptive management change.

January 2026
Coalition Letter on Bin 2 MPA Petitions

Petition2023-16MPA – Modify then Accept

Petition 16 requests the allowance of the commercial take of salmon by troll in two SMRs in the northern bioregion, Bodega Head and Stewarts Point, making them SMCAs. The petition argues similarly to petition 15, on the lack of interference allowed pelagic access would cause. While we do stand by this petition's core arguments, we also believe that this allowance should be accompanied with a similar recreational allowance of salmon by troll in these MPAs too.

Recreationally or commercially the salmon troll fisheries mirror each other with similar gear use, lack of gear conflicts with unintended species, and lack of interactions with the bottom environment due to the nature of the troll gear always moving and being in the upper section of the water column. There are no reasons to not allow recreational troll access in these areas as well because of this. This is further supported by the bordering and nearby pelagic allowed SMCAs in the area giving both recreational and commercial allowance for salmon trolling. A joint allowance would also help to solve any possible confusion on the water of only a specific group being able to troll in the area while others may not, reducing any possible enforcement problems.

Per SeaSketch, the LOPs of these areas as SMCAs allowing any kind of salmon trolling retains existing MPA protections for their respective connectivity benefits. While these MPAs in the northern bioregion are more-modern of MPAs, coming after initial MMPs, MPA frameworks, and processes, unlike those in Petition 15, we see this change allowance as reasonable for consideration. With the recreational troll allowance added to this petition, we see its arguments as more equitable and in-line with existing MPAs in the surrounding northern bioregion of the network.

Petition2023-18MPA – Accept

Petition 18 makes several requests across the Santa Barbara Channel to 6 MPAs in total, and some requests were non-regulatory requests. We support all of the prescribed changes in the petition to better regulatory language, provide better MPA regulation clarity through color corrections, and to make fine tune changes to better the overall MPA network. Of all the requests in petition 18, the most controversial is the creation of a shore region SMCA in the Vandenburg SMR. This would be called the Vandenburg SMCA and would allow shoretake of finfish. This case of a shore allowance is a unique case for our MPA network, as the bordering military base with the SMR allows shore fishing already anyway. This shoretake allowance would clear up any enforcement confusion by the public for the SMR and give some access back to the public in general. We believe this petition's regulatory and non-regulatory requests should be accepted in full.

Petition2023-19MPA – Reject or Modify

Petition 19 requests the creation of a tribal co-managed SMCA at Morro Bay that only allows for the recreational take of finfish and invertebrates except rock scallops and mussels by hand harvest, also including a tribal take exemption within the SMCA. We believe the petition should be either rejected or amended to allow for more general recreational and commercial take as well.

We believe tribal co-management to be a great step forward in managing California's waters and should be present in all MPAs; however, creating a new MPA that restricts exclusively commercial groups and most recreational fishing access from such an essential area should not be warranted. The commercial blocks overlapping the proposed SMCA account for 6.2% of Morro Bay's landing revenue alone. More specifically, these blocks represent 25% of the area's squid landings, 8.8% of the groundfish landings, and 15% of the area's salmon landings, per the MFDE. While not an exact correlation, recreational access in the area is likely comparable (with the exception of squid) and will likely be equally affected in the MPA regions, as this petition affects all fisheries not involving direct hand harvesting.

Additionally, there is concern that the proposed offshore wind energy program has its proposed electrical lines connecting the Morro Bay power bank stations to the offshore array crossing through the SMCA. If passed, this would need to be addressed and an additional allowance added.

Petition2023-20MPA – Reject Nearshore and Clarify/Accept Offshore

Petition 20 requests changes to the MPA cluster, the nearshore and offshore MPAs, at Point Buchon. The petition requests the offshore SMCA allow the hand harvest of finfish and invertebrates except rock scallops and mussels, allow the maintenance of artificial structures under the correct permits, and provide a tribal take exemption for federally recognized tribes. However, it is unclear if these requested allowances to the offshore SMCA at point Buchon are replacing or adding to existing recreational and commercial allowance for the take of albacore and salmon. Pursuant to the allowances being additive and not replacing the existing take allowances in the offshore MPA we support the request for the offshore region of the MPA cluster to have the added take allowances. This example in the offshore region is a clear example of how tribal components can be added to the existing network, not requiring creation of more MPAs to involve tribes.

Regarding the petitioner's request to the nearshore SMR being expanded, we believe this request should be rejected. The expansion of only the SMR section of the Point Buchon nearshore/offshore cluster would unnecessarily remove all access from the added area. The justification for this addition comes from MPA Collaborative meetings citing enforcement concerns, stating that moving the northern boundary to the physical

point will provide a better reference for enforcement. The core reason the existing MPA does not go to the physical point on land is because the nearest whole decimal degree value was used as the northern boundary instead, following MLPA guidelines. This usage of a round Lat/Long number for an MPA that does not experience much shore fishing opportunity is supported by the MLPA MPA design criteria to explicitly help, not hurt, enforcement. The current northern boundary gives those fishing beyond shore an easy to understand GPS reference point to know where the boundary is. Additionally, expanding only the nearshore SMR may cause further enforcement problems with the offshore SMCA remaining its original size. The expansion of the nearshore only leads to a case of an unevenly sized MPA in the nearshore and offshore regions.

Petition2023-21MPA – Accept

Petition 21 requests the Pyramid Point SMCA in the northern bioregion be modified to remove its existing recreational allowances for take of surf smelt and give additional tribal exemption to the Tolowa Dee-ni' Nation on top of its existing tribal exemption. The petition also requests the border of the MPA be moved south to the true CA-OR state boundary line, slightly shrinking the MPA.

While this petition does remove some recreational access to take surf smelt, that access was already relatively limited and small scale. The change to the border to shrink the SMCA to align to the actual state border clears up any possible confusion or issues the overlap currently causes. Overall we are supportive of this change, and addition of another Tribal component to the existing Pyramid Point SMCA.

Petition2023-23MPA-AM1 – Reject or Modify

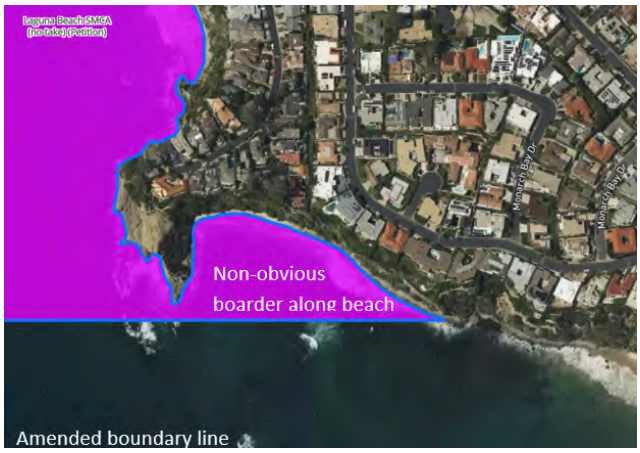
Petition 23 requests multiple changes to 3 existing SMCAs, the Carmel Bay SMCA, Pacific Grove SMCA, and the Edward F. Ricketts SMCA, requesting all three SMCAs become closed to take of finfish during “active kelp restoration permits” and to create a new SMR at Tankers Reef, the area of this SMR was reduced during amendments.

We believe the petition has reasonable goals, restoring kelp, but goes about this in the incorrect way. Regarding the specific MPA changes requested, we believe this petition should be rejected or modified. Acceptance would come at the additional loss of recreational fishing access to these SMCAs. Fishing has no significant impact on kelp restoration compared to environmental factors (e.g., water quality, water temperature, swell) and would be closed when a “kelp restoration permit is active.” This also raises further enforcement concerns as regulations would effectively be in constant flux depending if a permit is active or not, there would need to be new paths created to inform all on the water when said permit is active or not. Additionally, existing restoration efforts at Tankers Reef would immediately stop if an SMR is designated there for the lack of allowable take inside of an SMR, even the reduced in size SMR.

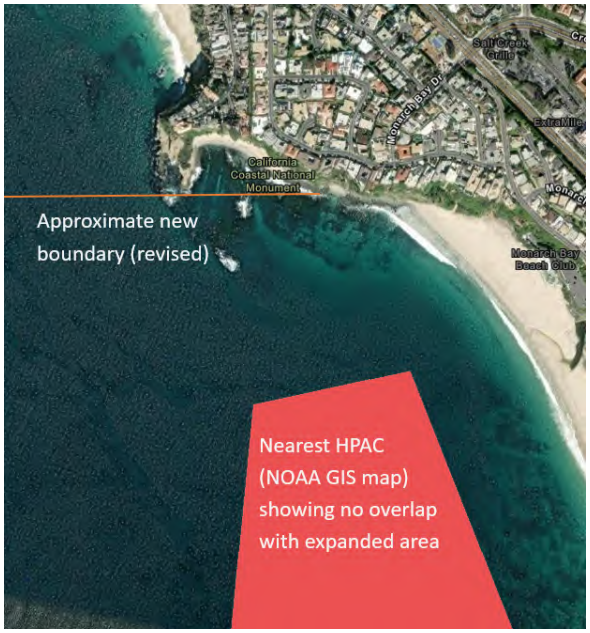
If the petitioner wishes to accomplish the outstanding goals of this petition, then a similar approach to that in Petition2023-14MPA should be considered. Such an approach could consist of keeping the 3 SMCAs as SMCAs with the same allowable take regulations, but only adding a new allowance for the recreational and commercial take of sea urchins, removing the finfish closures during "active permits." Regarding Tankers Reef, we believe no MPA, SMR or SMCA, should be designated there as existing restoration efforts would be able to continue there without requiring any closures or special allowances be made inside of a new MPA. Leaving Tankers Reef as is will also allow any future restoration methods to be deployed at the location without having to modify the SMCA allowances again as we continue to learn how to restore our kelp forests.

Petition2023-24MPA – Reject

Petition 24 requests expanding the existing Laguna Beach SMCA into the Dana Point SMCA. We believe Petition 24 should be rejected for several reasons. Petition 24's core argument claims enforcement concerns of the MPAs by lifeguards, when in fact, the primary enforcement of the MPAs is warden officers. Wardens are the only individuals that may issue citations for MPA compliance and are most notably, not bound by city limits. The idea of moving this border to allow for better enforcement will only create more of an enforcement problem due to where the proposed border lies versus the existing one. The existing border of the Laguna SMCA and Dana Point SMCA is a rocky point, a physical barrier between two areas. This allows the border to be clear as it is marked by an obvious, physical landmark, this is a guiding objective of the MLPA in MPAs that justifiably have a large shore fishing presence. The proposed new border would sit along the mean high tide line in the middle of a rocky beach. Simply put, removal of a physical barrier landmark to an invisible line on a public beach would only create more of an enforcement compliance problem, not reduce it along shore. (See Below images)



The petition then cites the Sustainable Fisheries Act of 1996 and its 2002 update where essential fish habitats (EFH) and habitat areas of particular concern (HAPCs) were designated along the west coast of California, Oregon, and Washington.



Essential fish habitats (EFHs) are defined by NOAA as areas where specific fish species, including groundfish, pink salmon, king salmon, coho salmon, coastal pelagic species, and highly migratory species, can feed, spawn, or grow to maturity. These habitats are extensive, the three EFHs overlapping the proposed expansion area—groundfish, CPS, and HMS—cover the entire coast of California, Washington, and Oregon. Because of their broad geographical scope, EFHs alone do not indicate a need for MPAs off the coast, or this proposed expansion.

Habitat areas of particular concern (HPACs), as the name implies, are sections of the EFH that are more important in providing the ecological functions that the general EFHs offer. These are more selective in their designation and display highlighted areas of concern within the EFHs. While these areas are more important in participating in these biological processes, the petitioner's proposed MPA expansion does not overlap with any existing HPACs (see above image). The arguments of the petition involving any EFHs or HPACs to protect this additional area are irrelevant for these reasons.

The petition additionally presents a rationale similar to that of Petition 2023-33 regarding the protection of kelp beds. It claims that conserving these areas is essential for the health of kelp forests. However, like the counterarguments we will see in Petition 2023-33, it is important to note again that fishing effort and so-called “anchor drag” does not significantly reduce kelp biomass; rather, factors such as water temperature, water quality, and swell conditions primarily drive changes in the kelp population. Additionally, any concerns raised in the petition about “anchor drag” damaging kelp beds would equally apply to non-consumptive vessels, not just fishing boats.

The petition references the Marine Mammal Protection Act (MMPA) concerning potential marine mammal entanglements from lobster traps in the area. While recreational and commercial lobster fishing occurs in the region, there have been little to no reported entanglement incidents involving whales or dolphins locally, showing in reality there is little need for concern. While it's important to acknowledge the possibility of such events, the absence of previous occurrences suggests that the likelihood of entanglements is extremely low. Furthermore, if the area were to be protected, lobster traps would simply be relocated, meaning the risk of entanglement would persist

regardless of where the traps are ultimately placed. Lastly, the adoption of ropeless fishing technologies, such as those developed by Sea Sonics, indicates a future where entanglement issues could be further mitigated.

Concerning the MLPA itself, it should be noted that the proposed expanded area would give the MPA an “L-shape.” This shape is specifically called out in the MLPA as a poor MPA design for enforcement and is just another reason we have concerns for this petition.

Petition2023-27MPA-AM1 – Reject

The original petition 27 and its amendments only look at lobster taken from the Anacapa SMCA. We believe this request should be rejected. Petition 27, similar to petitions calling for protections to increase kelp beds, calls for additional protections at the Anacapa Island SMCA, the difference being that 2023-27’s focus is on eelgrass, not kelp. While a trap sitting on the bottom does have a larger footprint than a pelagic hook and line configuration which is also allowed in the SMCA, traps fished in the area are not significantly impacting eelgrass beds due to there already being a 20 foot depth closure for traps around Anacapa in its Special Closure. This area contains already a large amount of the existing eelgrass beds as the SMCA and special closure overlap making the key rationale of this petition redundant as protections are effectively already in effect.

Petition2023-28MPA-AM1 – Reject

Petition 28 requests the establishment of a new MPA around Point Sal. This MPA would significantly impact local fisheries, recreational and commercial, despite the petitioner's claim that the effects would be minimal. For this primary reason we believe the petition should be rejected, even as amended to allow for shore based take of finfish.

The petition includes an economic analysis of the proposed area but overlooks the devastating local impacts this MPA would have economically. While the petition accurately states that the overlapping commercial fishing blocks contribute to 1.1% of the central coast's total landings by value, it fails to consider the actual local implications of that 1.1% and what it represents. Using the same time range (2012 to 2022) on the MFDE, the local port nearest to the proposed MPA, Port San Luis/Avila, derived 28.12% of its total commercial revenue from the overlapping blocks 631 and 632. More specifically, 25.92% of the port's groundfish revenue and 57.79%, over half, of its crab revenue came from these areas. If recreational effort even somewhat mirrors commercial effort in the area, not only is Point Sal relevant commercially, but recreationally too offshore. Establishing an MPA at Point Sal will significantly harm the community of Avila and other nearby ports, threaten local businesses, harm or remove

people's sources of income, and remove recreational and subsistence access to the area by boat.

Providing shore based take of finfish would allow for beach anglers to continue fishing as they have been, but would do so at the loss of all offshore activity. More notably, this also results in a drop of the LOP of the SMCA to moderate-low. This LOP ranking per the MLPA fails any connectivity requirements making the final proposed SMCA a protected area that does not add to total MPA network connectivity. This brings into question the main argument of the petitioner to add this MPA in order to maintain MPA connectivity, as the final amended SMCA would not accomplish this.

<u>Petition2023-29MPA-AM1 – Reject</u>

Petition 29 requests a new MPA be created at Carpinteria. This MPA would be a tribally allowed SMCA that would be closed to non-federally recognized tribal fishing (general recreational and commercial fishing); the petition was amended to reduce its overall size and allow shore-based take of finfish. The petition's three primary arguments for the new SMCA are to meet habitat connectivity/MPA spacing requirements, to protect habitat surrounding juvenile white shark grounds, and to allow for tribal access. While tribal co-management of all California MPAs should be considered, we believe for the following reasons this specific MPA proposal should be rejected.

Regarding habitat connectivity, the petition asserts that the spacing of the existing MPA network exceeds the recommendations set by the MLPA scientific advisory team, which suggests a minimum spacing of 31 to 62 miles. The petition argues that the nearest coastal MPAs, Campus Point and Point Dume, are too far apart, claiming they are separated by 63.8 nautical miles or 73.4 miles (Image 1).

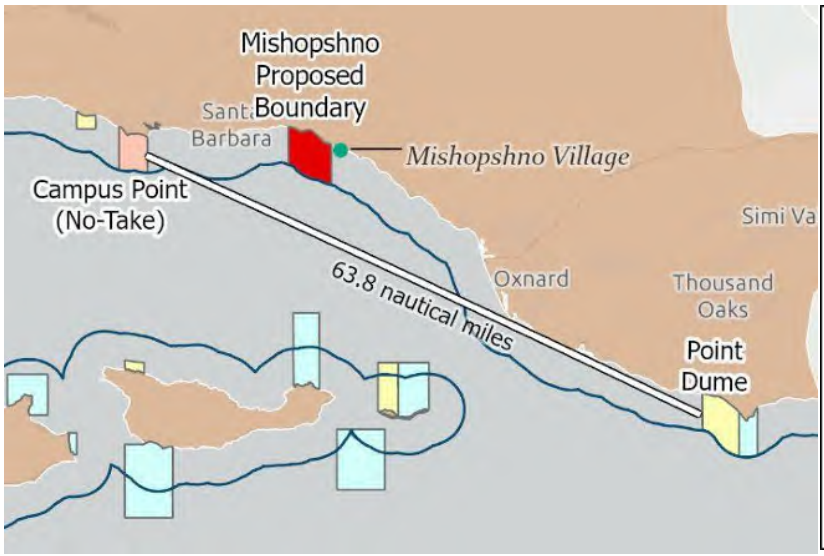


Image 1: Petition 29's image displaying proposed area and <u>claimed</u> spacing between existing Pt. Dume and Campus Point SMAs to be 63.8 nm (73.4 mi), which, if true, would exceed the southern MLPA MPA spacing requirements.

Note: the shown MPA is the original, pre-amendment size.

Discussions with the CDFW clarified that MPA spacing is measured by the, “shortest distance over water between two MPAs.” When measuring the distance between Campus Point and Point Dume, we find that it is in fact less than 62 miles, indicating that the current spacing distribution is adequate along the coast (see below Image 2).

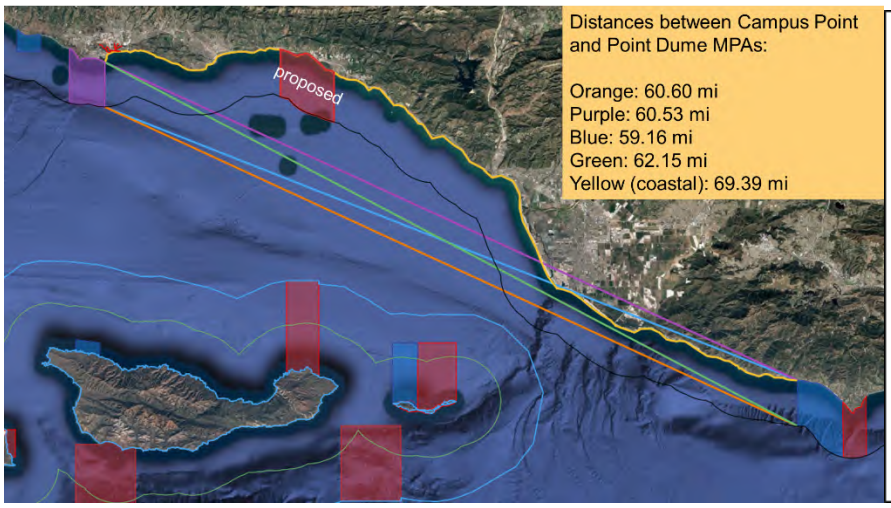


Image 2: Actual spacings between nearest existing MPAs around the proposed site. All but one straight line measurement exceeds 62 miles. The length that would be used by CDFW according to their provided input would be 60.60 mi (orange line) which falls within the spacing requirement.

Following the CDFW and MLPA guidelines, the shortest water distance between the two existing MPAs is ~60.60 miles, viewable by the orange line. This distance falls within the 31–62-mile MLPA spacing requirement. None of the provided measurements, including a measurement along the coastline (yellow) exceeded 73.4 miles of separation as the petitioner claims, again bringing into question the purpose for the new MPA if connectivity is already met.

In addition, the provided shore based take of finfish does allow for some form of recreational take but this now raises connectivity concerns. As mentioned in previous petitions, allowance of shore fishing of finfish reduces an MPAs LOP to moderate-low, losing its MPA connectivity with the network, this is confirmed by SeaSketch. Connectivity was a major reason for this MPAs proposal. With connectivity now lost due to these allowed take methods begs to question the purpose for this implementation in the first place if its foundational goals are not even accomplished. The LOP chart for the southern bioregion, moderate low protection is provided below.

	Mod-low	**SMCA SMP**	**Shore fishing** (H&L, hoop net); **kelp bass, barred sand bass, lingcod, cabezon, and rockfish** (H&L, spearfishing); **sheephead** (H&L, spearfishing, trap); **spotted sand bass and halibut** (H&L); **lobster** (trap, hoop net, diving); **urchin** (diving); **rock crab and Kellet's whelk** (trap); **catch and release** (H&L-general) **In water depth <10m: Catch and release** (H&L-single barbless hooks and artificial lures) **In water depth <50m at islands and <30m on mainland: pelagic finfish, bonito and white seabass** (H&L);

Regarding the protection of juvenile white shark nursery grounds, a similar petition was submitted in 2020 (Petition 2020-012 AM1) to close off a smaller section of beach at Carpinteria for the same purpose. Like Petition 29, this earlier petition aimed to protect

juvenile white sharks within the currently proposed area. This 2020 petition was rejected by the Department and the Fish and Game Commission (FGC), which stated that MPAs are designed to protect nearshore ecosystems rather than individual species, especially highly migratory species like white sharks. Given that this issue was previously addressed at the same location just four years ago, the same arguments against the current petition apply today regarding white sharks.

Lastly, regarding the tribal access portions of the petition, while tribal access and co-management should be explored across the entire MPA network, current access to the area by tribes is not limited in any way. Regardless of a tribal MPA designation or not, federally recognized tribes will have access in the area just like the public. Closing this area off to all groups except those of the federally recognized Santa Ynez Band of Chumash Indians would have the additional side effect of restricting any non-federally recognized tribes, as the petition does mention. In addition to the above counter reasons of the petition's primary claims, there exists additional effects to be considered at the proposed MPA site. The proposed area was considered during the MLPA for the southern section but was traded off for two other SMCAs on the coast, Naples and Kashtayit that were present in different MPA alternatives that Carpinteria was not in. If allowed, the new MPA would essentially break the agreements struck during the MLPA. Lastly, the pre- and post-amended boundaries overlap existing oil infrastructure that is maintained year round, no existing exemptions or conversations have been had regarding this infrastructure overlap. For these reasons we believe the petition should be denied.

<u>Petition2023-32MPA – Reject</u>

Petition 32 requests expanding the Duxbury Reef SMCA north, south and converting the SMCA into an SMR. The petition cites apparent drops in biodiversity in the areas, confusion on take regulations, and, as a result, high incidence of accidental poaching.

We believe this petition to be well intentioned but do not believe it should be accepted. The petition's claims that there was a local drop in biodiversity are all based on local surveys on no actual data displaying a measurable drop in the biodiversity in the area.

Observations by MPA Watch on potential MPA violations comes from observers seeing "anyone with buckets," citing even children with buckets counting as a possible violation. While it is understandable to ascertain data this way, we would like the commission to understand that someone simply with a bucket on one of the most popular beaches in the area does not mean they are violating MPA take regulations. This method of data collection possibly is why the self-reported values of possible violations at Duxbury are so high, when actual enforcement reports show infractions at Duxbury being so low they do not even make it to the yearly MRC report. Enforcement reports on MPAs from the yearly March MRC give insight into MPA violations in the state, of which Duxbury Reef never was in the top MPAs in violation (top 35) or top 5 in the northern region specifically in 2024 or 2025. Letters from partner agencies such as state and national parks as well as national marine sanctuaries all cite possible issues with the SMCA, all requesting it expand, but no agency goes so far as to support making the area an SMR. No hard data whatsoever has been provided to demonstrate a need to expand the SMCA to include these highly inaccessible areas in the north or south as well. The petitioner's claim that visitors walking through the existing southern border with legal catch from outside the SMCA is merely speculative. Access to the reef in this southern section is blocked by an inside channel except during extreme low tides, making further regulatory protection unnecessary and a niche case at best.

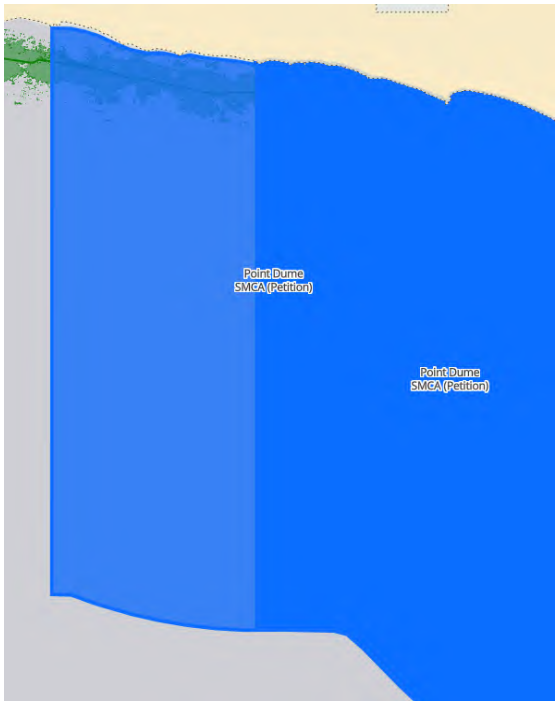
Regarding the original MPA expansion proposals, and even specifically the southern expansion (image above), the new covered area has a very asymmetric shape. This goes directly against MLPA guidelines for designating MPAs which state that MPAs with odd-asymmetric shapes are difficult to enforce and confusing to the public, possibly even adding to the confusions the petitioner claims is present at Duxbury. At the bare minimum, this border must be modified in a way that adheres to the MLPA MPA design guidelines before even being considered for final action. Because any possible additional area included or removed from the proposed expansion needs to be considered by all stakeholders, we must see what this final border actually is before providing further input. In December 2025, the petitioner did submit an informal request ("informal" was tagged by FGC staff) to change the border post-petition deadline, which could solve this odd shape issue. It is currently not known whether amendments like this can be considered. If the informal request is ultimately considered, the existing counter arguments still exist with exception of course of the expansion border shape.

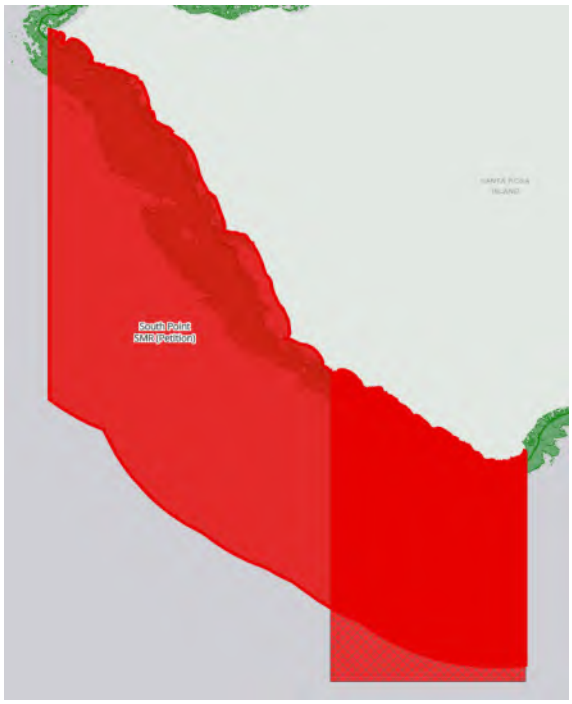
<u>Petition2023-33MPA – Reject</u>

Several groups and individuals have expressed opposition to this petition, and we all stand by the majority of their comments, even after the limited number of amendments to certain MPAs in petition 33. While there are various pathways for kelp restoration, the establishment of new or larger MPAs is not one of them. It is widely accepted that the growth and abundance of kelp are dependent on water quality and temperature. Even under ideal growing conditions, a large swell can damage kelp forests, ripping the

largest, most buoyant, stalks off the seafloor. Fishing activities have little to no impact on kelp health as seen by thriving kelp populations throughout history pre-dating even the MLPA when fishing access was less restrictive. It is well documented how we came to this spot in the first place for our kelp, the rolling El Ninos in the mid-2010s removed a substantial amount of our state's kelp forests, not fishing, and fishing restrictions are not what it will take for the forests to regrow. The creation or expansion of MPAs resulting from this petition will have a negligible effect on the recovery of kelp forests, but a permanent and lasting effect on those that have a livelihood on the water or those that want to simply fish and enjoy a day on the water. In some instances, such expansions may hinder restoration efforts by obstructing human interventions aimed at encouraging kelp growth, such as seeding areas or urchin barren removal efforts.

Furthermore, the petition does not adequately explain why most of the proposed expansion areas cover waters that are simply too deep for kelp to grow. All but one of its expansions (Gull Island) have this problem, covering waters well beyond kelps natural growing depth. Many of the proposed expansions extend to the state line, covering areas with depths exceeding 1,000 feet when kelp cannot grow any deeper than 150ft. For a petition focused on kelp restoration, this deepwater coverage is illogical and appears to be an attempt to limit area access to our already managed fisheries while protecting an area outside of the scope of the petition. Below are some of the petition's proposed expansions on SeaSketch with the kelp max extent per landsat and flyovers enabled (green layer under proposed expansions). This shows most of the expansion area does not even cover the absolute maximum kelp could grow. Any justifiable MPA expansions regarding kelp recovery at the bare minimum should be more targeted, covering specifically areas kelp can grow, not mass areas covering mostly water kelp cannot grow.





Lastly, the added amendments only pull back on one expansion, the Cabrillo SMR, and add in shore based take of finfish and general spearfishing of finfish at the proposed Pleasure Point SMCA and Point Dume SMCA. As mentioned previously, the shorebased allowance would reduce Pleasure Point and Point Dume to moderate-low levels of protection per the MLPA, losing their local MPA connectivity, making the proposed expansions weaken MPA connectivity rather than strengthen them. Specifically for Point Dume, that MPAs connectivity appears centrally important under the SeaSketch model and should be maintained. While the reduction in size at the Cabrillo expansion is a positive, we still believe any expansion in the first place is not warranted, especially for kelp restoration purposes.

Petition2023-34MPA – Reject

Petition 34 requests the redesignation of one offshore SMCA to a no-take SMR, merging it with the nearshore SMR at Point Buchon to make one no-take SMR. The petition also requests combining the nearshore and offshore SMCAs at Farnsworth into a single SMCA that would permit only pelagic finfish spearfishing, removing various pelagic fishing allowances existing there. The primary justification for these changes is enforcement concerns. Enforcement has effectively managed the existing MPA network without significant issues which already contains nearly 40% limited take SMCAs. The situations at Farnsworth and Point Buchon are similar to several other MPAs along the coast that successfully integrate nearshore and offshore components. The concept of allowing pelagic finfish targeting offshore—where interactions with the MPA's intended

protections are minimal—has been recognized since the first and second MPA Master Plans where it explicitly states the lesser effect pelagic fish have on themselves and the MPA ecosystem, and to allow for areas that have pelagic take respectively. Pelagic fishing should be permitted in MPAs that overlap with offshore waters, provided that fishing practices minimize interactions with local and nearshore species, which they inherently do. Additionally, if enforcement was truly the only concern, commercial harpoon at Farnsworth is just as enforceable, if not easier to enforce than recreational spear methods, and should be left in as an allowance in the SMCA. This petition also conflicts with Petition 20 and its requests at Point Bucheon.

The two MPA systems at Farnsworth and Point Bucheon are no different from other nearshore/offshore configurations, so-called “MPA clusters”, and we see no compelling reason to change them specifically. Both MPA clusters currently meet regional sizing guidelines for the total cluster area and LOP requirement to count them both for connectivity as is, with their current access. For these reasons, we believe this petition should be rejected.

Thank you,

AllWaters - AWPAC *(recreational)*
-Chris Killean (President)
-Matt Bond (Board Member)

Commercial Fishermen of Santa Barbara - CFSB *(commercial)*
-Chris Voss (President)
-Ava Schulenberg (Assistant Director)

Backcountry Hunters & Anglers - BHA *(recreational)*
-Devin O’Dea (Western Policy & Conservation Manager)

Coastal Conservation Association California - CCA Cal *(recreational)*
-Chris Arechaederra (Executive Director)
-Tonie Bagnos (Assistant Director)

Ventura County Commercial Fishermen's Association - VCCFA *(commercial)*
-Dave Colker (Executive Director)
-Jason Woods (President)
-Eric Hodge, Mike Kenny, Tim Athens (Board Members)

LA Rod and Reel Club *(recreational)*
-John Ballotti (President)

January 2026
Coalition Letter on Bin 2 MPA Petitions

Port San Luis Commercial Fishermen's Association *(commercial)*
-Chris Pavone (President)

Santa Barbara Sportfishing Club *(recreational)*
-Whitney Uyeda (President)

Alliance of Communities for Sustainable Fisheries *(recreational/commercial)*
-Alan Alward (Co-Chair)

San Diego Fishermen's Working Group *(commercial)*
-Pete Halmay (President)

Morro Bay Commercial Fishermen's Organization *(commercial)*
-Bill Blue (President)
-Tom Hafer (Secretary)

The Tuna Club Foundation *(recreational)*
-Chase Offield (Board Member)

Santa Barbara FreeDivers Club *(recreational)*
-Dave Huebner (President)
-Bradley Pirmen (Chair)

BD Outdoors *(recreational business)*
-Ali Hussainy (President)

The California Association of Harbor Masters and Port Captains *(commercial)*
-Tim Petrick (President)

Dana Wharf Sportfishing and Whale Watching *(recreational)*
-Donna Kalez (Co-Owner)

Santa Barbara Landing and Stardust Sportfishing *(recreational business)*
-Jamie Diamond (CEO/owner)

Monterey Bay Tritons *(recreational)*
-Brandon Burke (President)

NorCal Underwater Hunters *(recreational)*
-Matt Mattison (President)

January 2026
Coalition Letter on Bin 2 MPA Petitions

Fathomiers *(recreational)*
-Paul Romanowski (Conservation Officer)

The Catalina Seabass Fund *(recreational/commercial)*
-Jock Albright (Director)

The Laguna Maritime Alliance *(recreational/commercial)*
-Chase Offield (Chair)

Santa Cruz Kelp Stalker *(recreational)*
-Hans Haveman (Chair)

San Diego Freedivers *(recreational)*
-Ryan Moore (President)

OC Spearos *(recreational)*
-Hidenori Iwagami (president)

Long Beach Neptunes *(recreational)*
-Terry Maas (Chair)

Save Duxbury Access *(grassroots recreational/commercial)*
-Chris Martinelli (Local Lead)

American Fishing Tackle Company - AFTCO *(recreational/commercial business)*
-Bill Shedd (CEO)
-Casey Shedd (President)

Get Hooked Seafood *(commercial business)*
-Kim Selkoe and Victoria Voss (Co-Founders)

Pacific Coast Sportfishing *(recreational business)*
-Bill DePriest (Publisher / Editor)

January 2026
Coalition Letter on Bin 2 MPA Petitions

Dedicated Researchers/Scientists:

UCSB Bren School of Environmental Science & Management
-Dr. Dawn A. Murray (PhD. Ocean Sciences - UCSC)

UCSB & UCSC Conservation Scientist
-Dr. Jason Johns (PhD. Ecology and Evolutionary Biology - UCSB)

UCSB Marine Scientist
-Dr. Kim Selkoe (PhD. Ecology and Evolutionary Biology - UCSB)

Private Marine Scientist
-Ethan Estess (M.S. Earth Systems (Marine) - Stanford University)

Senior Marine Scientist and previous marine biologist for the Channel Islands NPS
-Derek Lerma (B.S. Biological Oceanography - Humboldt State University)

01/26/2026

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

Subject: Bin 2 MPA Petitions

Dear Melissa Miller-Henson,

Please add the San Diego County Wildlife Federation (SDCWF) to the CCA Coalition letter regarding Bin 2 MPA petitions being considered. We were unfortunately a bit late getting our logo and signature added to the letter represented below. The San Diego County Wildlife Federation represents over 20,000 sportsmen and women in San Diego County, and we are active in conserving our inland and aquatic habitats in a manner which allows both conservation protection with consumptive use of the waters of our state.

The SDCWF agrees with the recommendations of Coalition listed below.

Thank you for the work you and the Commissioners do for California outdoorsmen and women.

Respectfully,

Gary F. Brennan
President, San Diego County Wildlife Federation
P.O. Box 3886
Ramona, CA. 92065

Copy to: CCA California

Marine Conservation Institute

29 January 2026

Re: Comments from Marine Conservation Institute for consideration during the February 11-12, 2026 meeting on petitions to amend the state's MPA network.

(submitted via email to fgc@fgc.ca.gov)

Dear California Fish and Game Commission,

As California works to protect 30% of state waters by 2030 (30 x 30) to fight climate change, protect biodiversity, and expand access to nature for all Californians, the implementation of Marine Protected Areas (MPAs) that provide tangible benefits to marine biodiversity requires an understanding of effective conservation and knowledge of which MPAs meet that threshold.

Since 2012, Marine Conservation Institute's Marine Protection Atlas (MPAtlas) has brought a focused lens to the quality of marine protections in MPAs around the world. MPAtlas (mpatlas.org) is the largest global repository of MPA assessments using The MPA Guide[1]. The MPA Guide is a peer-reviewed scientific framework published in *Science* in 2021 that evaluates an MPA's stage of establishment and level of protection by looking at the management of mining, dredging & dumping, anchoring, infrastructure, aquaculture, fishing, and non-extractive recreational activities. Both management regulations and in situ activity data specific to each individual MPA are analyzed to determine the actual outcomes provided by a given MPA. Ecological evidence[2] from as recently as 2025 suggests that the best conservation outcomes are seen when MPAs are implemented or actively managed, and fully[3] or highly[4] protected from these seven activities.

Scientists from MPAtlas evaluated the 20 petitions proposing changes to California's MPA Network submitted to the California Fish and Game Commission by the public and Tribes in 2023 using The MPA Guide. Our preliminary analysis suggests that the following petitions would improve the level of protection for existing MPAs or designate new MPAs, expanding and strengthening the California State MPA Network's overall ability to achieve conservation benefits:

Petition	Marine Protected Area
2023-19MPA	Chitqawi SMCA
2023-20MPA	Point Buchon SMR
2023-23MPA-AM	Carmel Bay SMCA
	Pacific Grove Marine Gardens SMCA
	Tanker's Reef SMR
2023-24MPA-AM	Laguna Beach SMCA

14301 Arnold Drive Suite 25 Glen Ellen CA 95442
Marine-Conservation.org • +1 707 938-7036

2023-27MPA-AM	Anacapa Island SMCA
2023-28MPA-AM	Point Sal SMCA
2023-29MPA-AM	Mishopshno SMCA
2023-32MPA	Duxbury Reef SMR
2023-33MPA-AM	Cabrillo SMR
	Gull Island SMR
	Natural Bridges SMR
	Pleasure Point SMCA
	Point Conception SMR
	Point Dume SMCA
	South Point SMR
2023-34MPA	Farnsworth Offshore SMCA
	Farnsworth Onshore SMCA
	Point Buchon SMCA

With critical tipping points approaching ocean biodiversity, the opportunity to align California's MPA network with the best and most up-to-date understanding of MPA science is incumbent on the Commission. We urge the Commission to adopt the petitions that serve to advance conservation and keep the State of California moving forward with a world-leading example of marine conservation, creating an effective MPA network, and progressing towards the State's commitment to 30 x 30.

Sincerely,

Lance Morgan, PhD, President, Sonoma County
Nikki Harasta, Marine Conservation Scientist, Ventura County

1 Grorud-Colvert, K., et al. (2021). The MPA guide: A framework to achieve global goals for the ocean. Science. https://doi.org/10.1126/science.abf0861

2 Horta e Costa, B., et al. (2025). Marine protected areas' stage of establishment and level of protection are good predictors of their conservation outcomes. Cell Reports Sustainability. https://doi.org/10.1016/j.crsus.2025.100345

3 No impact from extractive or destructive activities is allowed and all abatable impacts are minimized. Non-extractive activities may include recreational, traditional, cultural, or spiritual activities. Examples include minimal impact snorkeling, swimming and SCUBA, tidepooling, cultural/ceremonial gatherings, education, knowledge transmission, and motorized or non-motorized vessels associated with the previously mentioned activities.

4 Only light extractive activities are allowed that have low impact, and all other abatable impacts are minimized. If any anchoring is allowed, it is small scale and for a short duration with a low impact. If any infrastructure is allowed, it is small scale with low impact. Any aquaculture must be low impact, small scale, low density, and unfed. If fishing occurs, it is infrequent and only five or fewer gear types are used that are highly selective and low-impact. Any non-extractive activities are regulated and restricted and of low impact, low density, and small scale.

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

February 6, 2026

Re: Retraction of signature and clarification of position on California MPA petitions

Dear President Zavaleta and Honorable Commissioners,

I am a marine scientist and environmental studies professor advising graduate students at Antioch University and teaching undergraduate courses in the Environmental Studies Department at UC Santa Barbara. I work in resource management and conservation realms to protect habitats and to amplify Indigenous voices in conservation initiatives. I also work locally with NOAA on intertidal marine sampling and support locally-rooted conservation efforts, including curriculum development and weaving Indigenous and Western Scientific Knowledge into system solutions. I have worked with the Northern Chumash Tribal Council (NCTC) supporting the Chumash Heritage National Marine Sanctuary (CHNMS) designation and Chumash cultural values, wisdom, and traditions in marine and land management practices. I currently serve on the NOAA CHNMS Advisory Committee as a Research Seat Alternate.

My research focuses on participatory conservation and co-designing conservation methods that equitably integrate local communities in multi-pronged conservation solutions. I value coalition-building, listening to and incorporating multiple perspectives in conservation planning. I work with fishermen around the world, including supporting the Miloli‘i Community-Based Subsistence Fishing Area (CBSFA), south of Kona, Hawai‘i, which includes the waters and submerged lands from the shoreline to the 100-fathom depth contour. The Miloli’i community leads the regulation creation and enforcement in their " last Hawaiian fishing village". In addition, I support the Commercial Fishermen of Santa Barbara in their continued efforts to practice local eco-friendly, sustainable fishing, sell locally caught fish in the Saturday market to our community, promote science and monitoring, and their stewardship of our coast via numerous annual beach and island clean-ups.

Over a year ago, I was asked to add my name to a joint letter about the MPA adaptive management proposals from commercial and recreational fishermen. I did so because of my relationships with many in the California fishing community. Recently, the letter was submitted to the Fish & Game Commission. Unfortunately, I had not kept up with the revisions, updates, or additions to the letter in the last 13 months and the in-depth amendments to each MPA petition. The letter contains recommendations that I am unable to endorse due to my expertise as a marine scientist. I need to retract my signature from that letter and clarify my position.

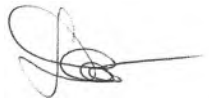
Clarifying my current perspectives on the MPA petitions:

- I submitted a letter in November 2023 endorsing Petition 2023-33MPA, and I am a supporter of protecting California's kelp forests because they provide invaluable ecological and environmental benefits. These dynamic and biodiverse ecosystems serve as critical nurseries for a wide variety of marine species, providing shelter and food for numerous fish, invertebrates, and marine mammals. Healthy kelp forests support thriving commercial and recreational fisheries and can help dampen the impacts of coastal erosion and storm impacts. With the declines in kelp forest cover across the Pacific West Coast, including California, from natural and human-induced factors, MPAs are a critical tool for supplying the population of recruits and supporting the resilience of kelp ecosystems in the face of these stressors.
- To achieve the stated goals of conserving biodiversity and ecosystem health, I encourage the state to consider increasing protections for MPAs that are currently only lightly or minimally protected as defined by The MPA Guide,[1] especially in places where weaker or more complicated regulations lead to poor compliance and enforcement. An example of what I support are the clarifications on Kashtayit regulation language and Campus Point SMCA color coding (Petition 2023-18MPA).
- I support strengthening the MPA network through the addition of new MPAs where they would protect critical habitat and advance Tribal co-stewardship. To that end, I endorse Petition 2023-28MPA designating Point Sal SMCA, which provides an opportunity to strengthen protections within the CHNMS and offers a pathway for meaningful co-stewardship between the state and NCTC. In addition, I support Petition 2023-29MPA designating Mishopshno SMCA, which would protect a special place culturally and ecologically, and similarly offer a pathway for meaningful co-stewardship between the state, Santa Ynez Band of Chumash Indians, and potentially other Tribes. I appreciate that the petitioners were responsive to feedback from the local community, including recreational and commercial fishers, cutting the size of the proposal in half.
- Finally, I do not support weakening MPA protections off the California coast in any capacity. For example, to open recreational fishing opportunities to non-Base fishers, Petition 2023-18MPA would create a narrow alongshore State Marine Conservation Area within the existing SMR that would allow all people to fish for finfish by hook and line. This change would weaken the MPA network by officially downgrading the protections within the state's largest fully protected MPA. Instead, I support the state ensuring current Vandenberg SMR restrictions are enforced and applied to Base personnel and dependents, so that it is not only non-military community members who must comply.

California's MPA network is imperative for maintaining healthy ocean habitats, biodiversity along the California coast, and ecosystem resilience. Management of MPAs can also honor numerous knowledge systems - commercial fishers, recreational fishers, Indigenous peoples, local communities, and Western scientific knowledge systems. The adaptive management process offers a pathway to improve, and build on the successes of our globally-recognized MPA network.

[1] Grorud-Colvert, Kirsten, Jenna Sullivan-Stack, Callum Roberts, et al. 2021. "The MPA Guide: A Framework to Achieve Global Goals for the Ocean." Science, ahead of print, September 10. World. https://doi.org/10.1126/science.abf0861.

Thank you for the opportunity to clarify my position. I appreciate your leadership and your commitment to a healthy and vibrant ocean for all.



Dr. Dawn A. Murray
Professor Environmental Studies, Antioch University
Lecturer Environmental Studies Department, UC Santa Barbara

Outlook

Marine Conservation Institute Comments on CDFW Recommendations for MPA Petitions

From Ali Rubin <ali.rubin@marine-conservation.org>
Date Tue 03/31/2026 03:02 PM
To FGC <FGC@fgc.ca.gov>

Dear Commissioners,

On behalf of Marine Conservation Institute, please find attached our comments on the California Department of Fish and Wildlife's Evaluations and Recommendations for the ten non-Tribally-led Marine Protected Area (MPA) petitions released on March 20, 2026 .

We appreciate your consideration of these comments and your continued work to advance effective marine conservation in California.

Sincerely,
Ali Rubin

Ali Rubin
Marine Conservation Scientist

Marine Conservation Institute

ali.rubin@marine-conservation.org
marine-conservation.org

Marine Conservation Institute

March 31, 2026

President Eric Sklar
California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244-2090
Submitted electronically to: fgc@fgc.ca.gov

Re: Comments from Marine Conservation Institute on petitions to amend the State's MPA network.

Dear California Fish and Game Commission,

On behalf of Marine Conservation Institute, we appreciate the opportunity to provide comments following the California Department of Fish and Wildlife's (CDFW) Evaluations and Recommendations for the ten non-Tribally-led Marine Protected Area (MPA) petitions released on March 20, 2026.

Marine Conservation Institute works to secure strong protection for the ocean's most important places. Through our Marine Protection Atlas (MPAtlas), we assess marine protected areas globally using The MPA Guide, a peer-reviewed framework that evaluates the level of protection and expected conservation outcomes of MPAs. Our work supports governments and partners, including in California, in advancing effective, science-based marine conservation and achieving 30x30 goals.

We recognize the significant effort undertaken by CDFW to evaluate these petitions based on the information available as of March 2025, and we appreciate the Department's acknowledgment that additional information may continue to inform Commission deliberations. As California works toward protecting 30% of state waters by 2030, maintaining the integrity and effectiveness of the existing MPA network is essential to achieving meaningful conservation outcomes.

As part of this effort, we conducted an analysis to determine the likely biodiversity outcomes of the petitions submitted to the State using The MPA Guide framework. This approach applies a consistent, science-based method to evaluate how proposed changes would affect protection levels and conservation outcomes across California's MPA network.

We strongly support CDFW's recommendations to deny petitions that would lower protection levels within California's MPA network by allowing additional recreational or commercial take of marine life. Scientific evidence consistently demonstrates that the greatest ecological benefits such as increased biomass, biodiversity, and ecosystem resilience are achieved in MPAs that are fully or highly protected from extractive activities.

We also acknowledge that localized ecological pressures, such as sea urchin overpopulation and kelp loss, may require active management. In these cases, we encourage the Commission to explore adaptive, site-specific management strategies that address these threats without reducing protection levels or opening extractive fisheries within MPAs.

In particular, we support the recommendations to deny the following petitions:

- Modify Take in 9 SMCAs to Allow Commercial Take of Sea Urchins (2023-14MPA)[1]
- Reclassify Footprint, Gull Island, and Santa Barbara Island SMRs to SMCAs to Allow Take of Highly Migratory Species (2023-15MPA_AM)
- Reclassify Stewarts Point and Bodega Head SMRs to SMCAs to Allow Commercial Salmon Trolling (2023-16MPA)
- Modify Allowed Uses at Several Santa Barbara Channel MPAs and Special Closures: Vandenberg SMR, Kashtayit SMCA, and San Miguel and Anacapa Special Closures (2023-18MPA)

1: With the exception of the Point Vicente no-take SMCA, petition 2023-14MPA does not lower the Highly Protected status of the named MPAs per our MPA Guide analysis, and may provide ecological benefits through the restoration effort of urchin culling. However, while ecosystem restoration and conservation may be complementary, they are non-substitutable actions where priority should be given to preventing the degradation of intact ecosystems.

These petitions propose changes that would reduce the level of protection in areas that currently contribute to the ecological performance of California's MPA network. Downgrading protections risks undermining biodiversity gains, weakening ecosystem resilience in the face of climate change, and compromising California's leadership in marine conservation.

To advance the state's goal of protecting 30% of nature by 2030, we do believe that the following proposals will modestly strengthen the network and urge the commission to support them:

- Designate new MPA as Chitqawi SMCA (2023-19MPA)
- Redesignate Point Buchon SMCA as Chumash SMCA to support tribal co-management and take provisions; extend northern boundary of Point Buchon SMR (2023-20MPA)
- Multiple changes to Pyramid Point SMCA (2023-21MPA)
- Reclassify all or part of Anacapa Island SMR (2023-27MPA)
- Designate new MPA as Point Sal SMR (2023-28MPA)
- Add new MPA as Mishopshno SMCA near Carpinteria (2023-29MPA)
- Reclassify and expand Duxbury Reef SMCA (2023-32MPA)
- Reclassify Point Buchon SMCA and modify regulations in Farnsworth MPAs (2023-34MPA)

California's MPA network is widely recognized as a global model for science-based ocean protection. Maintaining strong protections within this network is critical not only for achieving the State's 30x30 commitments, but also for ensuring long-term conservation benefits for marine ecosystems and coastal communities.

We respectfully urge the Commission to uphold CDFW's recommendations to deny these petitions and to continue advancing policies that strengthen, rather than diminish, the effectiveness of California's MPA network.

Thank you for your consideration.

Respectfully,

Lance E. Morgan, President
Nikki Harasta, Marine Conservation Scientist I
Alexandra Rubin, Marine Conservation Scientist I

Received April 2, 2026

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

From: Matthew Bond

Sent: Saturday, April 4, 2026 4:56 PM

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

Subject: April 14 Tribal Committee Meeting Comment From Allwaters Re Tribal MPA Petition Review Process and Tribal MPA Petitions

Hello,

Please find our comment attached.

Thank you.

Matt Bond

Allwaters.

March 30, 2026

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

Submitted electronically to fgc@fgc.ca.gov

Re: 04/14/2026 Fish and Game Commission Tribal Committee Meeting Agenda Item 4

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

My name is Matt Bond and I'm commenting on behalf of Allwaters Protection and Access Coalition. Please accept our thoughts on the Tribally led or co-led MPA petitions being evaluated by the Commission.

Because we are now unclear as to the process being used to evaluate these petitions and it doesn't seem we will be able to comment on them at the bio regional meetings, we are taking this opportunity to share our recommendations and supporting analysis with the Commission. We are equally uncertain if the guidelines we have been working with for the past two and a half years are still valid for this set of petitions. Stakeholders, The Commission and The Department were working with the understanding that petition analysis and decisions would be based on SAT guidelines from original MLPA, The Master Plan for MPAs, as much as possible site specific or at least locally relevant scientific analysis, and other historically relevant information. We are no longer sure this is the case. We strongly encourage this Committee to recommend to the full Commission that these petitions continue to be evaluated by the Department in the same manner the non-tribal petitions were. Creating a separate framework, outside of what is called for by the MLPA, potentially serves as a barrier to trust and participation and may result in outcomes that harm both the marine resources you are charged with managing as well as the people who depend on them for health, recreation, and sustenance. The following are our opinions and corresponding rational, based on the original, agreed upon process.

Petition2023-19MPA – Reject or Modify

Petition 19 requests the creation of a tribal co-managed SMCA at Morro Bay that only allows for the recreational take of finfish and invertebrates except rock scallops and mussels by hand harvest, also including a tribal take exemption within the SMCA. We believe the petition should be either rejected or amended to allow for more general recreational and commercial take as well.

We believe tribal co-management to be a great step forward in managing California's waters and should be present in all MPAs; however, creating a new MPA that restricts

exclusively commercial groups and most recreational fishing access from such an essential area should not be warranted. The commercial blocks overlapping the proposed SMCA account for 6.2% of Morro Bay's landing revenue alone. More specifically, these blocks represent 25% of the area's squid landings, 8.8% of the groundfish landings, and 15% of the area's salmon landings, per the MFDE. While not an exact correlation, recreational access in the area is likely comparable (with the exception of squid) and will likely be equally affected in the MPA regions, as this petition affects all fisheries not involving direct hand harvesting.

Additionally, there is concern that the proposed offshore wind energy program has its proposed electrical lines connecting the Morro Bay power bank stations to the offshore array crossing through the SMCA. If passed, this would need to be addressed and an additional allowance added.

Petition2023-20MPA – Reject Nearshore and Clarify/Accept Offshore

Petition 20 requests changes to the MPA cluster, the nearshore and offshore MPAs, at Point Buchon. The petition requests the offshore SMCA allow the hand harvest of finfish and invertebrates except rock scallops and mussels, allow the maintenance of artificial structures under the correct permits, and provide a tribal take exemption for federally recognized tribes. However, it is unclear if these requested allowances to the offshore SMCA at point Buchon are replacing or adding to existing recreational and commercial allowance for the take of albacore and salmon. Pursuant to the allowances being additive and not replacing the existing take allowances in the offshore MPA we support the request for the offshore region of the MPA cluster to have the added take allowances. This example in the offshore region is a clear example of how tribal components can be added to the existing network, not requiring creation of more MPAs to involve tribes.

Regarding the petitioner's request to the nearshore SMR being expanded, we believe this request should be rejected. The expansion of only the SMR section of the Point Buchon nearshore/offshore cluster would unnecessarily remove all access from the added area. The justification for this addition comes from MPA Collaborative meetings citing enforcement concerns, stating that moving the northern boundary to the physical point will provide a better reference for enforcement. The core reason the existing MPA does not go to the physical point on land is because the nearest whole decimal degree value was used as the northern boundary instead, following MLPA guidelines. This usage of a round Lat/Long number for an MPA that does not experience much shore fishing opportunity is supported by the MLPA MPA design criteria to explicitly help, not hurt, enforcement. The current northern boundary gives those fishing beyond shore an easy to understand GPS reference point to know where the boundary is. Additionally, expanding only the nearshore SMR may cause further enforcement problems with the offshore SMCA remaining its original size. The expansion of the nearshore only leads to a case of an unevenly sized MPA in the nearshore and offshore regions.

Petition2023-21MPA – Accept

Petition 21 requests the Pyramid Point SMCA in the northern bioregion be modified to remove its existing recreational allowances for take of surf smelt and give additional tribal exemption to the Tolowa Dee-ni' Nation on top of its existing tribal exemption. The petition also requests the border of the MPA be moved south to the true CA-OR state boundary line, slightly shrinking the MPA.

While this petition does remove some recreational access to take surf smelt, that access was already relatively limited and small scale. The change to the border to shrink the SMCA to align to the actual state border clears up any possible confusion or issues the overlap currently causes. Overall we are supportive of this change, and addition of another Tribal component to the existing Pyramid Point SMCA.

Petition2023-28MPA-AM1 – Reject

Petition 28 requests the establishment of a new MPA around Point Sal. This MPA would significantly impact local fisheries, recreational and commercial, despite the petitioner's claim that the effects would be minimal. For this primary reason we believe the petition should be rejected, even as amended to allow for shore based take of finfish.

The petition includes an economic analysis of the proposed area but overlooks the devastating local impacts this MPA would have economically. While the petition accurately states that the overlapping commercial fishing blocks contribute to 1.1% of the central coast's total landings by value, it fails to consider the actual local implications of that 1.1% and what it represents. Using the same time range (2012 to 2022) on the MFDE, the local port nearest to the proposed MPA, Port San Luis/Avila, derived 28.12% of its total commercial revenue from the overlapping blocks 631 and 632. More specifically, 25.92% of the port's groundfish revenue and 57.79%, over half, of its crab revenue came from these areas. If recreational effort even somewhat mirrors commercial effort in the area, not only is Point Sal relevant commercially, but recreationally too offshore. Establishing an MPA at Point Sal will significantly harm the community of Avila and other nearby ports, threaten local businesses, harm or remove people's sources of income, and remove recreational and subsistence access to the area by boat.

Providing shore based take of finfish would allow for beach anglers to continue fishing as they have been, but would do so at the loss of all offshore activity. More notably, this also results in a drop of the LOP of the SMCA to moderate-low. This LOP ranking per the MLPA fails any connectivity requirements making the final proposed SMCA a protected area that does not add to total MPA network connectivity. This brings into question the main argument of the petitioner to add this MPA in order to maintain MPA connectivity, as the final amended SMCA would not accomplish this.

Petition2023-29MPA-AM1 – Reject

Petition 29 requests a new MPA be created at Carpinteria. This MPA would be a tribally allowed SMCA that would be closed to non-federally recognized tribal fishing (general recreational and commercial fishing); the petition was amended to reduce its overall size and allow shore-based take of finfish. The petition's three primary arguments for the new SMCA are to meet habitat connectivity/MPA spacing requirements, to protect habitat surrounding juvenile white shark grounds, and to allow for tribal access. While tribal co-management of all California MPAs should be considered, we believe for the following reasons this specific MPA proposal should be rejected.

Regarding habitat connectivity, the petition asserts that the spacing of the existing MPA network exceeds the recommendations set by the MLPA scientific advisory team, which suggests a minimum spacing of 31 to 62 miles. The petition argues that the nearest coastal MPAs, Campus Point and Point Dume, are too far apart, claiming they are separated by 63.8 nautical miles or 73.4 miles (Image 1).

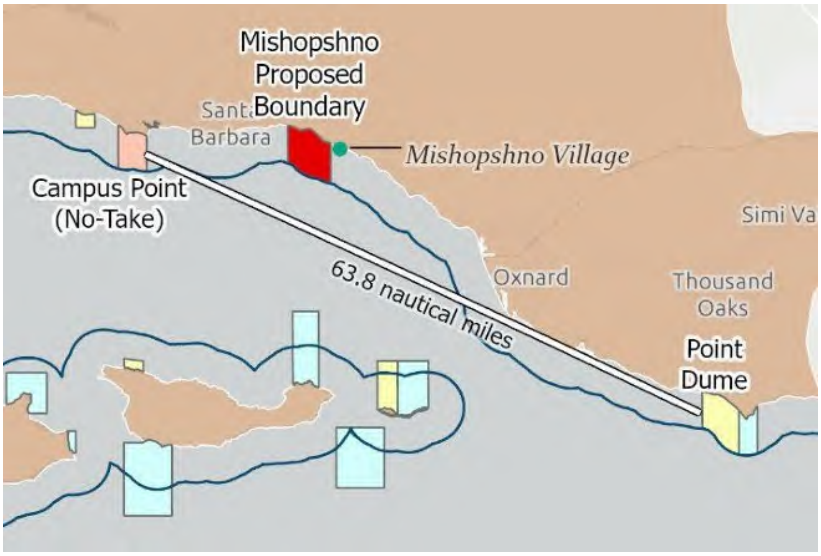


Image 1: Petition 29's image displaying proposed area and claimed spacing between existing Pt. Dume and Campus Point SMAs to be 63.8 nm (73.4 mi), which, if true, would exceed the southern MLPA MPA spacing requirements.

Note: the shown MPA is the original, pre-amendment size.

Discussions with the CDFW clarified that MPA spacing is measured by the, "shortest distance over water between two MPAs." When measuring the distance between Campus Point and Point Dume, we find that it is in fact less than 62 miles, indicating that the current spacing distribution is adequate along the coast (see below Image 2).

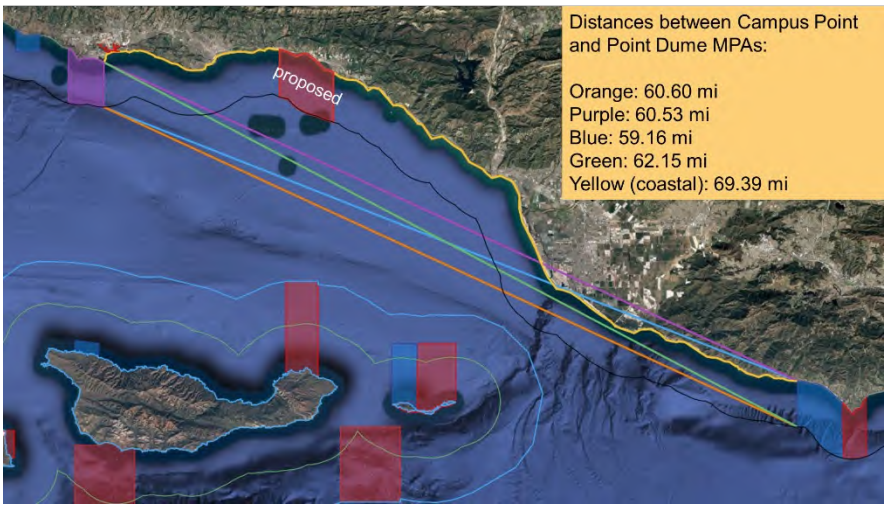


Image 2: Actual spacings between nearest existing MPAs around the proposed site. All but one straight line measurement exceeds 62 miles. The length that would be used by CDFW according to their provided input would be 60.60 mi (orange line) which falls within the spacing requirement.

Following the CDFW and MLPA guidelines, the shortest water distance between the two existing MPAs is ~60.60 miles, viewable by the orange line. This distance falls within the 31–62-mile MLPA spacing requirement. None of the provided measurements, including a measurement along the coastline (yellow) exceeded 73.4 miles of separation as the petitioner claims, again bringing into question the purpose for the new MPA if connectivity is already met.

In addition, the provided shore based take of finfish does allow for some form of recreational take but this now raises connectivity concerns. As mentioned in previous petitions, allowance of shore fishing of finfish reduces an MPAs LOP to moderate-low, losing its MPA connectivity with the network, this is confirmed by SeaSketch. Connectivity was a major reason for this MPAs proposal. With connectivity now lost due to these allowed take methods begs to question the purpose for this implementation in the first place if its foundational goals are not even accomplished. The LOP chart for the southern bioregion, moderate low protection is provided below.

	Mod-low	**SMCA SMP**	**Shore fishing** (H&L, hoop net); **kelp bass, barred sand bass, lingcod, cabezon, and rockfish** (H&L, spearfishing); **sheephead** (H&L, spearfishing, trap); **spotted sand bass and halibut** (H&L); **lobster** (trap, hoop net, diving); **urchin** (diving); **rock crab and Kellet's whelk** (trap); **catch and release** (H&L-general) **In water depth <10m: Catch and release** (H&L-single barbless hooks and artificial lures) **In water depth <50m at islands and <30m on mainland: pelagic finfish, bonito and white seabass** (H&L);

Regarding the protection of juvenile white shark nursery grounds, a similar petition was submitted in 2020 (Petition 2020-012 AM1) to close off a smaller section of beach at Carpinteria for the same purpose. Like Petition 29, this earlier petition aimed to protect juvenile white sharks within the currently proposed area. This 2020 petition was rejected by the Department and the Fish and Game Commission (FGC), which stated that MPAs are designed to protect nearshore ecosystems rather than individual species, especially

highly migratory species like white sharks. Given that this issue was previously addressed at the same location just four years ago, the same arguments against the current petition apply today regarding white sharks.

Lastly, regarding the tribal access portions of the petition, while tribal access and co-management should be explored across the entire MPA network, current access to the area by tribes is not limited in any way. Regardless of a tribal MPA designation or not, federally recognized tribes will have access in the area just like the public. Closing this area off to all groups except those of the federally recognized Santa Ynez Band of Chumash Indians would have the additional side effect of restricting any non-federally recognized tribes, as the petition does mention. In addition to the above counter reasons of the petition's primary claims, there exists additional effects to be considered at the proposed MPA site. The proposed area was considered during the MLPA for the southern section but was traded off for two other SMCAs on the coast, Naples and Kashtayit that were present in different MPA alternatives that Carpinteria was not in. If allowed, the new MPA would essentially break the agreements struck during the MLPA. Lastly, the pre- and post-amended boundaries overlap existing oil infrastructure that is maintained year round, no existing exemptions or conversations have been had regarding this infrastructure overlap. For these reasons we believe the petition should be denied.

Thank you very much for this opportunity to comment and for your dedicated work in supporting both the interests of California's Tribal People as well as the health and perseverance of the natural resources shared in trust by all Californians.

Respectfully,

Matt Bond

Allwaters Protection and Access Coalition

Ventura County Commercial Fishermen's Association
1237 S. Victoria Ave #284
Oxnard, CA 93035
(805) 663-2152
venturacountyfishermen@gmail.com

21st April, 2026

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

Subject: **Concerns Regarding Petition 2023-19MPA – Chitqawi SMCA (Morro Bay Area)**

Dear California Fish and Game Commission,

My name is Dave Colker, and I serve as the Executive Director of the Ventura County Commercial Fishermen's Association (VCCFA). Through my role with VCCFA, I represent a growing network of commercial fishermen, industry partners, and stakeholders who are directly connected to and dependent upon access to California's coastal resources.

Our association has been actively engaged throughout the Marine Protected Area (MPA) petition process, carefully reviewing proposals, participating in meetings, and working to ensure that the voices of the commercial fishing community are heard and considered. We are committed to responsible ocean stewardship, sustainable fisheries, and collaborative management approaches that are grounded in sound science, practical application, and a full understanding of both ecological and socioeconomic impacts.

On behalf of the Ventura County Commercial Fishermen's Association (VCCFA), I respectfully submit comments regarding Petition 2023-19MPA proposing the establishment of the Chitqawi State Marine Conservation Area in the Morro Bay region.

While we recognize and respect the cultural significance of this proposal and the intent to protect marine resources, our primary concern lies in the **lack of a comprehensive socioeconomic analysis** and the absence of a meaningful evaluation of **effort displacement and its impacts on surrounding open fishing areas**.

The petition provides detailed ecological objectives, including protection of nearshore habitats, rockfish, and forage species . However, it does not provide a corresponding level of analysis regarding how this closure would affect the fishing community and regional ocean use.

There is little to no evaluation of how fishing effort will be redistributed once access to this area is restricted.

When access to a productive or strategically important fishing area is removed, fishing effort does not disappear—it is **displaced** into surrounding open areas. In the case of this proposed SMCA, that displaced effort would likely shift into already utilized fishing grounds along the Central

Coast, including areas off:

- Morro Bay and Cambria
- Point Buchon and surrounding waters
- Other open-access areas along the Central Coast region

This redistribution results in predictable and measurable impacts:

- Increased competition among fishermen
- Higher congestion in remaining fishing grounds
- Increased gear conflict
- Reduced efficiency and increased operating costs
- Greater localized pressure on marine resources in open areas

These impacts represent real **socioeconomic consequences**, yet they are not meaningfully addressed in the petition.

Additionally, the petition lacks a clear economic impact assessment. There is no detailed analysis of how this proposal would affect:

- Individual fishing operations and their economic viability
- Shoreside businesses such as processors, fuel docks, and suppliers
- The broader coastal economy connected to commercial fishing

Marine Protected Areas do not operate in isolation. Expanding closures without fully understanding the external impacts shifts the burden onto the remaining open areas and the fishermen who rely on them.

Without addressing effort displacement and regional economic effects, the conclusion that impacts would be limited or acceptable cannot be fully supported.

For these reasons, VCCFA respectfully urges the Commission to carefully consider these gaps before moving forward with this petition. At a minimum, we recommend:

1. A comprehensive socioeconomic analysis reflecting real-world fishing behavior
2. A detailed evaluation of effort displacement and impacts to open areas
3. A complete economic impact assessment, including indirect and cumulative effects

We appreciate the Commission's efforts in reviewing these petitions and respectfully request that these critical considerations be addressed to ensure balanced and informed decision-making.

Thank you for your time and consideration.

Respectfully submitted,

Dave Colker
Executive Director

Dave Colker • Executive Director • venturacountyfishermen@gmail.com • 805-663-2152 • www.vccfa.org

Ventura County Commercial Fishermen's Association (VCCFA)

Dave Colker • Executive Director • venturacountyfishermen@gmail.com • 805-663-2152 • www.vccfa.org

From: Rick Duenas <[redacted]>
Sent: Wednesday, April 22, 2026 09:56 AM
To: FGC <FGC@fgc.ca.gov>
Subject: Public comment: May 5-6, 2026: Central Region Petitions

Dear President Sklar and Members of the Commission,

My name is Rick Duenas and I am a recreational angler and diver in Northern California who often recreates on the central coast. I am writing regarding the MPA petitions for San Luis Obispo through Santa Barbara County including the Northern Channel Islands. I urge you to deny most of these petitions or encourage petitioners to carve out recreational access as noted below.

2023-28: **Deny**. The remoteness and aspect of this location serve as refuge as it is fishable only in calmer weather patterns already. Also, this location is already inside the Chumash Heritage National Marine Sanctuary and therefore already counted in 30x30. I would prefer that any new MPAs contribute to increasing the 30x30 percentage.

2023-29: **Deny or revise.** This area provides important near-shore access for divers and small-craft anglers. I would like to see spearfishing, spiny lobster, and boat-based hook-and-line finfish take allowance. From the Tribal Committee Meeting, it was not clear to me what cultural activities would be supported by this MPA that are not already allowed. I recognize the importance of protecting submerged ancestral sites, so I would prefer that restrictions be tailored to barring the use of destructive bottom gear or anchoring instead of restricting lower impact gear types.

2023-19: **Accept with revision**. I appreciate that the petitioner allowed for the take of finfish as the location is one of the better areas for salmon and halibut trolling in the region. However, this area is also important to the commercial sector, particularly for market squid, so I would like to see commercial access with low impact gear preserved as well.

2023-20: **Accept** as clarified in Tribal Committee Meeting. I appreciate the petitioner not changing general public fishing access to salmon and albacore while allowing for tribal take and co-management.

2023-34: **Deny**. I support CDFW's recommendation. I appreciate allowance for low impact pelagic take wherever possible.

2023-33: **Deny.** I support CDFW's recommendation. The proposed actions would severely limit in-shore recreation access.

2023-18: **Deny**. I support CDFW's recommendation. I appreciate opportunities for more access but I am okay with the status quo and do not wish to trade access elsewhere in the network in order to balance this change.

2023-27: **Deny**. I dive Anacapa every fall and the amended 0-30m proposal seemed like one of the more reasonable and targeted petitions but I support CDFW's recommendation.

2023-14: **Deny**. I support CDFW's recommendation. I believe that these reserves should serve as control treatment groups relative to urchin barren mitigation being done outside of reserves.

2023-15: **Deny**. I support CDFW's recommendation. I appreciate opportunities for more access but I am okay with the status quo and do not wish to trade access elsewhere in the network in order to balance this change.

In short, please consider denying or requesting revision to the vast majority of the central region bin-2 petitions. Thank you for your time.

Sincerely,

Rick Duenas

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

MEMORANDUM

Date: March 20, 2026

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

From: Craig Shuman
Marine Regional Manager

Subject: CDFW 2023 MPA Bin 2 Petition Evaluations for the Ten Non-Tribally-led Petitions

At its February 14-15, 2024, meeting, the California Fish and Game Commission (CFGC) referred 20 Marine Protected Area (MPA) petitions to the California Department of Fish and Wildlife (CDFW) for review, evaluation, and recommendation. Throughout 2024, CDFW implemented a 3-phased approach to evaluate MPA petitions which was supported by the Marine Resources Committee (MRC) and approved by CFGC in April 2024. The MRC considered CDFW's recommendations on 5 petitions (Bin 1) at the November 6-7, 2024, MRC meeting and CFGC adopted the recommendations at the December 11-12, 2024, CFGC meeting.

At the March 13, 2025, MRC meeting, CDFW presented the proposed timeline and process for the remaining 15 petitions (Bin 2). This included the development of an evaluation framework for the Bin 2 petitions and sorting the petitions into groups to facilitate subsequent petition discussions. CFGC approved the proposed timeline and process at their April 16-17, 2025, meeting. CDFW, with support from staff at CFGC and the Ocean Protection Council, developed the draft 2023 MPA Bin 2 Petition Evaluation Framework for the MRC's consideration at the July 16-17, 2025, meeting, which was approved by CFGC at their August 2025 meeting with minor modifications. CDFW has completed the Evaluations and Recommendations for the ten non-Tribally-led petitions (Attachments 2-11) as listed below. CDFW's recommendations on the ten non-Tribally-led petitions are based on petitions and amendments received as of March 2025. **Additional changes, amendments and interested party engagements completed by petitioners after that date have not been considered as part of the evaluation and recommendations.** CDFW recognizes that new information on these petitions may be available for CFGC consideration.

- **2023-14MPA:** Modify take in 9 SMCAs to Allow Commercial Take of Sea Urchins
- **2023-15MPA-AM:** Reclassify Footprint, Gull Island, and Santa Barbara Island SMRs to SMCAs to Allow Take of Highly Migratory Species
- **2023-16MPA:** Reclassify Stewarts Point and Bodega Head SMRs to SMCAs to Allow Commercial Salmon Trolling
- **2023-18MPA:** Modify Allowed Uses at Several Santa Barbara Channel MPAs and Special Closures: Vandenberg SMR, Kashtayit SMCA, and San Miguel and Anacapa Island Special Closures
- **2023-23MPA-AM:** Modify Allowed Uses in Four Monterey Area MPAs, Create a New MPA, and Other Requests
- **2023-24MPA-AM:** Expand Boundaries of Laguna Beach No-take SMCA
- **2023-27MPA-AM:** Amend Existing Anacapa Island SMCA or Special Closure to Protect Eelgrass
- **2023-32MPA:** Reclassify Duxbury Reef SMCA to an SMR and Expand the Southern and Northern Boundaries
- **2023-33MPA-AM:** Expand Boundaries of Cabrillo, Natural Bridges, Point Conception, South Point, and Gull Island SMRs, Point Dume SMCA, and Add a New SMCA at Pleasure Point
- **2023-34MPA:** Reclassify Point Buchon SMCA to an SMR and Limit Allowable Uses at Farnsworth Onshore and Offshore SMCAs to Recreational Spearfishing

CDFW also prepared a 2023 Decadal Management Review Marine Protected Area Petition Evaluation Companion Document (Companion Document; Attachment 1). The Companion Document should be read in advance of the petition evaluations as it includes supplemental information and additional context that is relevant for all the evaluations. The Companion Document includes a summary of CDFW's outreach to California Native American tribes and engagement with Tribally-led petitioners. CDFW plans to provide an update on the Tribally-led petitions at the Tribal Committee meeting on April 14, 2026.

If you have any questions or need more information, please contact me at r7regionalmgr@wildlife.ca.gov.

Attachment 1: CDFW's 2023 Decadal Management Review Marine Protected Area Petition
Evaluation Companion Document

Attachment 2: CDFW Evaluation and Recommendations for **2023-14MPA**: Modify take in 9 SMCAs to Allow Commercial Take of Sea Urchins

Attachment 3: CDFW Evaluation and Recommendations for **2023-15MPA-AM**: Reclassify Footprint, Gull Island, and Santa Barbara Island SMRs to SMCAs to Allow Take of Highly Migratory Species

Attachment 4: CDFW Evaluation and Recommendations for **2023-16MPA:** Reclassify Stewarts Point and Bodega Head SMRs to SMCAs to Allow Commercial Salmon Trolling.

Attachment 5: CDFW Evaluation and Recommendations for **2023-18MPA:** Modify Allowed Uses at Several Santa Barbara Channel MPAs: Vandenberg SMR, Kashtayit SMCA, and San Miguel and Anacapa Island Special Closures

Attachment 6: CDFW Evaluation and Recommendations for **2023-23MPA-AM:** Modify Allowed Uses in Four Monterey Area MPAs, Create a New MPA, and Other Requests

Attachment 7: CDFW Evaluation and Recommendations for **2023-24MPA-AM:** Expand Boundaries of Laguna Beach No-take SMCA

Attachment 8: CDFW Evaluation and Recommendations for **2023-27MPA-AM:** Amend existing Anacapa Island SMCA or Special Closure to Protect Eelgrass

Attachment 9: CDFW Evaluation and Recommendations for **2023-32MPA:** Reclassify Duxbury Reef SMCA to an SMR and Expand the Southern and Northern Boundaries

Attachment 10: CDFW Evaluation and Recommendations for **2023-33MPA-AM:** Expand Boundaries of Cabrillo, Natural Bridges, Point Conception, South Point, and Gull Island SMRs, Point Dume SMCA, and Add a New SMCA at Pleasure Point

Attachment 11: CDFW Evaluation and Recommendations for **2023-34MPA:** Reclassify Point Buchon SMCA to an SMR and Limit Allowable Uses at Farnsworth Onshore and Offshore SMCAs to Recreational Spearfishing

ec: Meghan Hertel, Director
California Department of Fish and Wildlife

Chad Dibble, Deputy Director
Wildlife and Fisheries Division

Kevin Thomas, Deputy Director
Regional Operations

Nathaniel Arnold, Chief
Law Enforcement Division

Wendy Bogdan, General Counsel
Office of General Counsel

Claire Waggoner, Marine Region Habitat
Conservation Program Manager
Marine Region

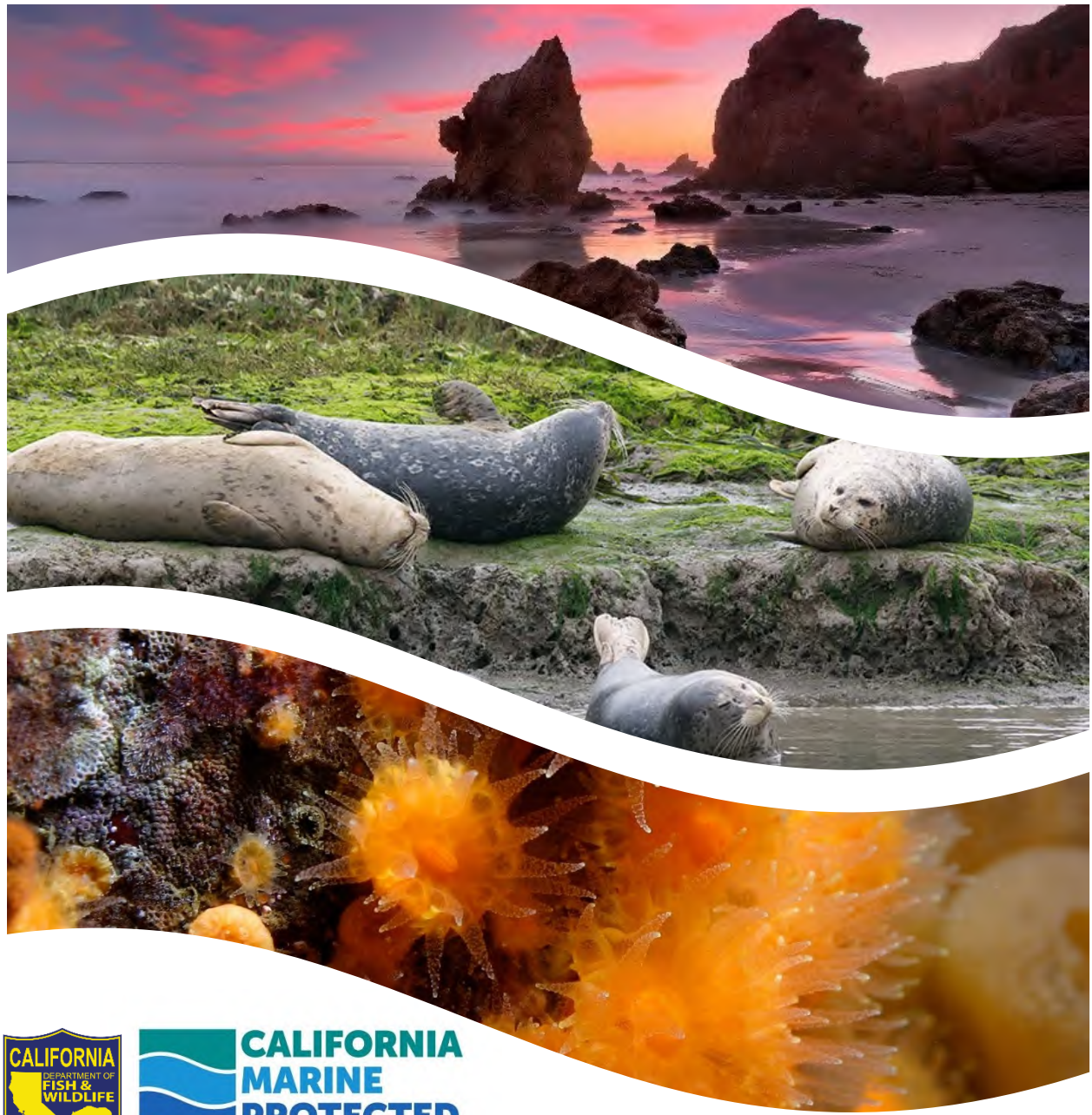
Erica Mason, Statewide Marine Protected Area
Management Project Supervisor
Marine Region

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

Attachment 1

California Department of Fish and Wildlife's 2023 Decadal Management Review Marine Protected Area Petition Evaluation

COMPANION DOCUMENT



CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

CALIFORNIA MARINE PROTECTED AREAS

March 20, 2026

This document is the 2023 Decadal Management Review Marine Protected Area Petition Evaluation Companion Document (Companion Document). The Companion Document and the California Department of Fish and Wildlife (CDFW) Transmittal Memo should be read in advance of the 2023 Bin 2 Petition Evaluations as it includes supplemental information and additional context for the evaluations.

INTRODUCTION

At its February 14-15, 2024, meeting, the California Fish and Game Commission (CFGC) referred 20 Marine Protected Area (MPA) petitions to CDFW for review, evaluation, and recommendation. These petitions were sorted into Bin 1 and Bin 2 petitions. The Marine Resources Committee (MRC) considered CDFW's recommendations on 5 Bin 1 petitions at the November 6-7, 2024 MRC meeting and CFGC adopted the MRC's recommendations at the December 11-12, 2024 CFGC meeting.

On August 14, 2025, the CFGC approved an evaluation framework (Framework) for the 15 Bin 2 Petitions referred to the CDFW proposing changes to the MPA Network. CDFW developed the Framework, with support from staff at CFGC and Ocean Protection Council (OPC), based on the adaptive management process outlined in chapter 4 of the 2016 Master Plan for MPAs. The 2016 Master Plan directs CDFW and CFGC to use the Marine Life Protection Act (MLPA) goals and mandates, MPA objectives, and design considerations as the primary basis for evaluating any action taken to make changes to the MPA Network. The 2016 Master Plan adaptive management process also includes consideration of emerging issues, such as changes to the MPA Network that would enhance climate resilience and/or help mitigate climate impacts. CDFW considered climate change effects throughout the evaluation, recognizing that the effects of climate change are overarching and climate resilience is an implicit goal of adaptive management of the MPA Network as a whole. The Framework also draws from the Decadal Management Review (DMR) and recommendations, and the MPA Regulation Change Petition Framework approved by CFGC at their August 2023 meeting, which is rooted in the DMR recommendation cornerstones of MPA Governance, MPA Management Program Activities, and MPA Network Performance.

The Framework includes the following sections:

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

CDFW used the Framework to transparently evaluate petitions and develop recommendations to CFGC for the 2023 MPA Bin 2 petitions. The evaluations were based on materials submitted in December 2023 and amendments received through March 2025; subsequent changes, improvements, or stakeholder engagement undertaken by petitioners after March 2025 were not considered. CDFW recognizes that new information on these petitions may be available for CFGC consideration.

The Bin 2 petitions and petition actions vary in complexity, and the Framework is designed to address this spectrum of complexity. In some cases, it was more appropriate to evaluate Bin 2 petitions as a whole and in other cases, it was more appropriate to evaluate the individual proposed actions or grouped proposed actions that were similar within a petition. Not all evaluation components in Section IV applied to every proposed action or petition as they were not all relevant to each proposed action or petition. CDFW applied the evaluation components as appropriate, and the level of detail varied based on factors such as applicability of the question or information available. Non-regulatory requests were not evaluated through the Framework. For some petitions, CDFW recommended an alternative pathway to achieving the desired outcome of the proposed change.

The DMR indicated the MPA Network is meeting expectations and functioning effectively to achieve the goals of the MLPA. Therefore, significant regulatory changes to the MPA Network should meet a high threshold of demonstrated conservation value and need, as well as clear, science-supported benefit.

This evaluation is not the only process by which regulatory changes have been considered as part of the adaptive management of the MPA Network. Since implementation of California's MPA Network, targeted legislative and regulatory refinements have been identified to align MPAs with their original intent, clarify or correct provisions, or address priority management and enforcement issues. Since 2013, four legislative amendments and seven regulatory packages have been enacted to strengthen and support the adaptive management of the MPA Network and Management Program. The regulatory amendments:

- 2014 – Clarified and corrected provisions, including general provisions, definitions, take, and boundaries
- 2015 – Clarified and corrected provisions, including general provisions, definitions, take, and boundaries. This includes refining and correcting boundary coordinates for 106 MPAs.
- 2016 – Added provisions for tribal take in north coast MPAs
- 2018 – Repealed a special closure due to conflict with private property

- 2018 – Added provisions for tribal take in south coast MPAs and amended boundaries to better align with historical subsistence and cultural use
- 2022 – Cleaned up State Marine Recreational Management Area language
- 2023 – Provided a mechanism for operation and maintenance of pre-existing artificial structures in MPAs

The legislative amendments include Senate Bill 96 (2013), Assembly Bill 298 (2015), Assembly Bill 2369 (2018), and Assembly Bill 63 (2021). See Appendix G of the Decadal Management Review for more information about regulatory packages and legislative amendments that apply to MPA Network management implemented since 2012. All amendments were deliberately and carefully constructed to preserve the integrity of the MPA Network.

The Department remains committed to adaptive management through regulatory and non-regulatory pathways and will continue to work with tribes and partners to advance the recommendations of the DMR through a science-based inclusive statewide process consistent with the requirements of the MLPA and MPA Master Plan.

SUPPLEMENTAL EVALUATION INFORMATION

CDFW compiled supplemental information and additional context for the Tribally-led petitions, the responses to Evaluation Questions 1, 2a, 9, 10a, and 14, and Section V. Supplemental Analyses, Data and Information, And Citations. CFGC staff conducted the analysis and prepared the responses for Questions 16 and 17 and provided additional context for their evaluations below. The information provided here was common across the evaluations and is included here to prevent having to repeat it in each evaluation.

TRIBALLY-LED PETITIONS

This Companion Document includes a summary of the process for identifying Tribally-led petitions, CDFW's outreach to all California Native American tribes throughout the petitions process, and a summary of outreach and engagement with Tribally-led petitioners (Attachment A below). As directed by CFGC, CDFW evaluated the Tribally-led petitions with the CDFW 2023 MPA Bin 2 Petition Evaluation Framework. Tribally-led petitions, per CFGC direction, will next be discussed at the April 14, 2026, CFGC Tribal Committee Meeting. *Note: California Native American tribe is the preferred term to use per the Governor's Office of Tribal Affairs when generally mentioning tribes of California, both federally and non-federally recognized.*

The following petitions were identified by CFGC as Tribally-led petitions:

- Tolowa Dee-ni' Nation: Remove Recreational Take of Smelt and Change the Boundary at Pyramid Point SMCA (2023-21MPA)
- Santa Ynez Band of Chumash Indians (SYBCI): Designate a new Chitqawi SMCA in Morro Bay with a Tribal Exemption for SYBCI (2023-19MPA)
- Santa Ynez Band of Chumash Indians: Change the Take and Add a Tribal Exemption at Point Buchon SMCA, Change the Boundary at Point Buchon SMR (2023-20MPA)
- Santa Ynez Band of Chumash Indians: Designate a new SMCA near Mishopshno/Carpinteria with a Tribal Exemption for SYBCI (2023-29MPA)
- Northern Chumash Tribal Council: Designate a new SMCA at Point Sal (Santa Barbara Co.) With Allowance for Recreational Take of Finfish by Hook and Line From Shore (2023-28MPA)

Summary of Tribal Outreach and Engagement with California Native American Tribes for the 2023 MPA Petitions

In late 2023, CFGC received 20 petitions from California Native American tribes (tribes) and the public requesting changes to California's Marine Protected Area (MPA) Network. The CFGC referred the 2023 MPA Petitions to CDFW to evaluate in early 2024. This document provides a summary of tribal outreach and engagement with California Native Tribes for the 20 MPA petitions, including five Tribally-led petitions, proposing approximately 70 changes to the MPA regulations for MPAs from southern California to the Oregon border (2023 MPA petitions).

Summary of CDFW tribal outreach for all 2023 MPA petitions

Since receiving the petitions, CDFW has provided regular updates on the status of the 2023 MPA petitions and petition evaluation process through email communications and mailed letters to the CDFW tribal contact list. The CDFW tribal contact list includes over 400 individuals across the state who represent and/or work for a California Native American tribe. The statewide list is maintained by CDFW's Tribal Liaison and includes people on the Native American Heritage Commission (NAHC) contact list and others who have elected to receive updates from CDFW related to tribes. These updates included offers for consultation and meetings between tribes and CDFW. In October 2025, CFGC and CDFW sent letters via email and postal mail to the CDFW tribal contact list to specifically offer formal consultation or informal meetings on the 2023 MPA Petitions. CDFW also presented written and verbal updates at meetings of the CFGC's Tribal Committee. These outreach efforts to tribes are summarized in Table 1.

Summary of additional outreach and engagement with tribes for Tribally-led petitions

At the August 12, 2025, CFGC's Tribal Committee meeting, the Tribal Committee identified four of the 2023 MPA petitions as Tribally-led petitions, which are petitions that were submitted by a tribe, representative designated by a tribe, or tribal organization, or have a tribal co-sponsor. These included:

- 2023-19MPA submitted by Santa Ynez Band of Chumash Indians
- 2023-20MPA submitted by Santa Ynez Band of Chumash Indians
- 2023-21MPA submitted by Tolowa Dee-ni' Nation
- 2023-29MPA submitted by Natural Resource Defense Council and co-sponsored by Santa Ynez Band of Chumash Indians

At the May 7, 2025, meeting, the Tribal Committee requested CDFW send additional offers to all tribes for consultation on the remaining 2023 MPA Petitions and to reach out to offer to meet with tribes associated with the Tribally-led petitions.

On October 16, 2025, CDFW distributed to the CDFW statewide tribal contact list a letter offering joint tribal consultation with CDFW and CFGC on any 2023 MPA petition. This letter was also included in the fall quarterly CDFW Tribal Updates email.

On November 24, 2025, CFGC received a letter from Northern Chumash Tribal Council and Natural Resources Defense Council indicating that Northern Chumash Tribal Council was a formal co-sponsor for petition 2023-28MPA, and requested CFGC consider the petition a Tribally-led petition.

At the December 9, 2025, Tribal Committee Meeting, the Tribal Committee reconsidered this petition and recommended CFGC designate it as a Tribally-led petition. At the December 11, 2025, CFGC Meeting, CFGC designated petition 2023-28MPA as a Tribally-led petition.

At the February 11, 2026, CFGC meeting, CFGC approved the addition of an update and discussion on the Tribally-led petitions at the April 14, 2026, Tribal Committee Meeting.

Between September 2025 and February 2026, CDFW participated in several discussions with representatives of tribes regarding the Tribally-led petitions.

Table 1. Summary of CDFW tribal outreach and engagement to-date related to the 2023 MPA petitions and petition process, including communication method and type of content. Unless otherwise specified, all tribal outreach communications included tribes listed on the CDFW tribal contact list maintained by CDFW's Department Tribal Liaison, which includes 400 people from the NAHC Contact List and additional tribal representatives.

Date	Method	Content
5/31/2024	Email	Released Blog Post: Seeking Your Feedback to Help Manage California's Marine Protected Area Network
10/4/2024	Email	CDFW Informational MPA DMR Petition Process Update: Background, DMR petition process, next steps, upcoming meetings
10/25/2024	Email	Released Blog Post: MPA Day
11/22/2024	Email	CDFW Informational MPA DMR Petition Process Update: Background, DMR petition process, next steps, upcoming meetings
4/11/2025	Email	CDFW Tribal Liaison provided Department update email, including CDFW Informational MPA DMR Petition Process Update
5/7/2025	Tribal Committee: Meeting Materials	Written Informational Update: California's Marine Protected Area Network Decadal Management Review and Subsequent Marine Protected Area Regulation Amendment Petition Process (pg. 99 of 129) Verbal update on the 2023 MPA petitions and draft evaluation framework by Susan Ashcraft, Commission Marine Advisor
8/14/2025	Tribal Committee: Meeting Presentation	Presentation by Craig Shuman, CDFW Marine Region Manager, on 2023 MPA petitions and draft evaluation framework. Tribal Committee identified four Tribally-led petitions.
9/2025	Email	CDFW invitation to meet to discuss petitions sent to petitioners for the four Tribally-led petitions
10/16/2025	Mail	Invitation Letter for joint tribal consultation with CDFW and CFGC on any 2023 MPA petition
10/17/2025	Email	CDFW Tribal Liaison - Department update email, including CDFW Informational MPA DMR Petition Process Update and Invitation Letter for Joint Tribal Consultation
10/20/2025 – 2/27/26	Meetings	Discuss Tribally-led petitions with tribal petitioners

CDFW 2023 MPA BIN 2 PETITION EVALUATION

EVALUATION QUESTIONS

Question 1: Does the proposed change support the MPA Network in meeting one or more of the MLPA Goals and align with MPA Master Plan adaptive management objectives?

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

MLPA Goals

1. Protect the natural diversity and abundance of marine life, and the structure, function and integrity of marine ecosystems.
2. Help sustain, conserve and protect marine life populations, including those of economic value, and rebuild those that are depleted.
3. Improve recreational, educational and study opportunities provided by marine ecosystems that are subject to minimal human disturbance, and to manage these uses in a manner consistent with protecting biodiversity.
4. Protect marine natural heritage, including protection of representative and unique marine life habitats in CA waters for their intrinsic values.
5. Ensure California's MPAs have clearly defined objectives, effective management measures and adequate enforcement and are based in sound science guidelines.
6. Ensure the State's MPAs are designed and managed, to the extent possible, as a network.

Master Plan Adaptive Management Objectives

- Protect the structure and function of marine ecosystems
- Improve native marine life populations, including those of economic value
- Ensure minimal disturbance while allowing for sustainable opportunities for recreation, education and research
- Ensure comprehensive representation of all key habitats, including unique habitats

- Use learning acquired through administration of the MPA Management Program to adaptively manage the objectives, management measures, enforcement efforts, and scientific guidelines to inform management decisions
- MPAs function as a cohesive statewide network

Question 2a: Does the proposed change advance adaptive management recommendations in the Decadal Management Review?

Decadal Management Review
Adaptive Management Recommendations

Question 9: Does the proposed change improve individual MPA or MPA Network design so that it better aligns with or meets the MPA science guidelines?

To ensure consistency across petition evaluations, CDFW developed a decision tree to evaluate if a proposed action would improve individual MPA or MPA Network design and/or improve alignment with the Science Guidelines (Figure 1). The decision tree includes considerations such as whether the proposed change has the potential to affect the MPA's size or level of protection and other questions to respond to the question. The Science Guidelines were developed by the Science Advisory Team during the MLPA Initiative planning process to provide quantitative, science-based guidance for achieving network-scale ecological objectives (e.g., North Coast Study Region guidance Executive Summary from the North Coast SAT Methods Used to Evaluate MPA Proposals). While there were slight deviations between planning regions in the amount of individual habitat types necessary to meet habitat representation and replication targets, key design elements were consistent statewide. In particular, MPAs intended to contribute to ecological goals were required to be at least 9 square miles in size and meet one of the three highest levels of protection (Very High, High, or Moderate-High).

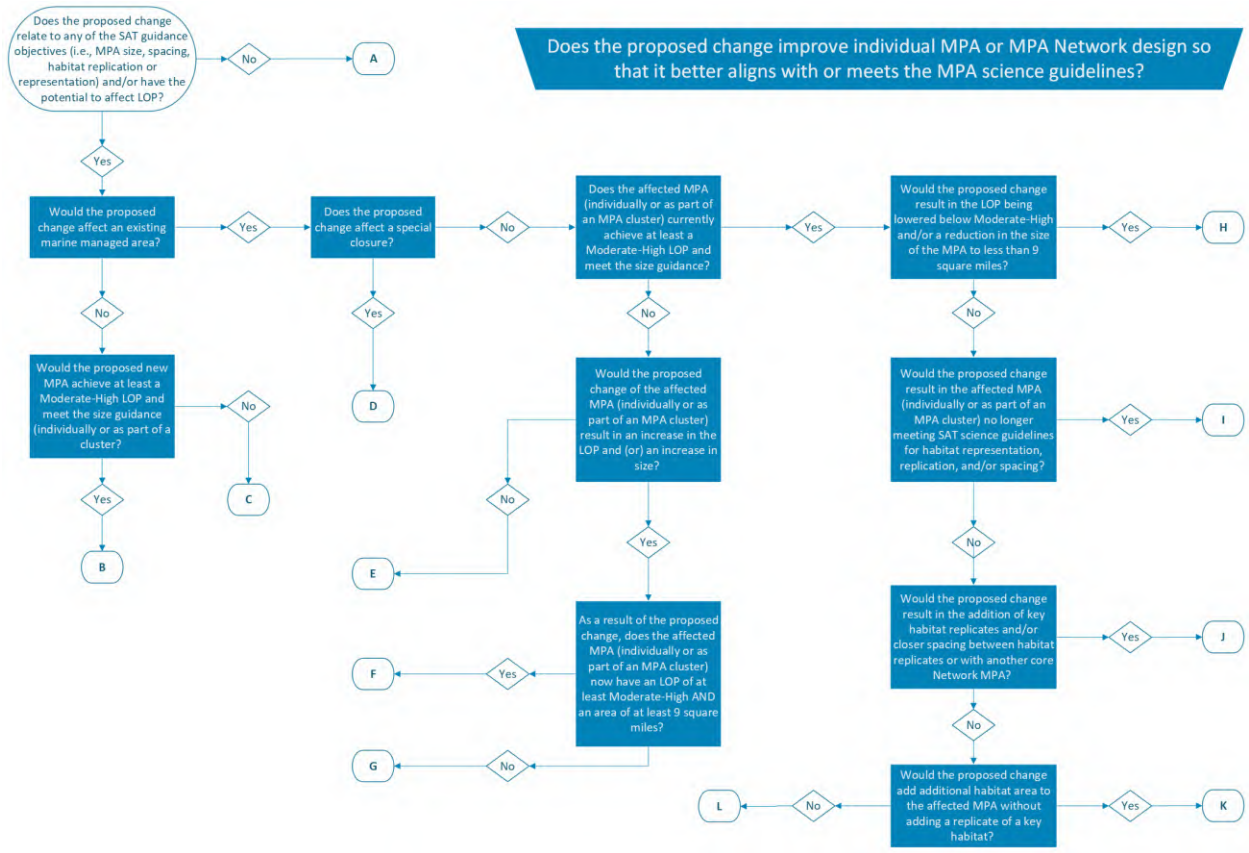


Figure 1. Decision tree framework used to formulate responses for Question 9 for each proposed action. The starting point, at the upper left corner, is based on whether the proposed change has the potential to affect the MPA's size or level of protection. The rest of the questions help to identify the effects such a change may have on the design of the individual MPA and the MPA Network. Based on this decision tree, the effects of a proposed action were determined to belong to one of the following groups:

A. Not applicable because the proposed action does not affect MPA size or LOP. Proposed action does not improve the design of the individual MPA or the MPA Network, nor does it enhance alignment with the Science Guidelines.
B. New MPA meets minimum size and LOP requirements. Proposed action would improve Network design and enhance alignment with the Science Guidelines.
C. New MPA does not meet minimum size and/or LOP requirement. Proposed action does not improve Network design, nor does it enhance alignment with the Science Guidelines.
D. Not applicable because the Science Guidelines do not apply to special closures. Proposed action does not improve Network design, nor does it enhance alignment with the Science Guidelines.

E. Neither existing MPA nor as proposed meets minimum size and/or LOP requirement. Proposed action does not improve the design of the individual MPA or the MPA Network, nor does it enhance alignment with the Science Guidelines.
F. Existing MPA does not meet minimum size and/or LOP requirement, but would meet both as proposed. Proposed action improves the design of the individual MPA and the MPA Network, and enhances alignment with the Science Guidelines.
G. Existing MPA does not meet minimum size and/or LOP requirement. Proposed change improves individual MPA design, but does not improve MPA Network design or enhance alignment with the Science Guidelines.
H. Existing MPA meets minimum size and LOP requirements, but no longer would as proposed. Proposed action does not improve the design of the individual MPA or the MPA Network, nor does it enhance alignment with the Science Guidelines.
I. Existing MPA meets minimum size and LOP requirements. MPA as proposed meets both criteria but no longer meets one or more Science Guidelines. Proposed action does not improve the design of the individual MPA or the MPA Network, nor does it enhance alignment with the Science Guidelines.
J. Existing MPA meets minimum size and LOP requirements. Proposed action results in meeting additional Science Guideline(s). Proposed action improves design of individual MPA and MPA Network, and enhances alignment with the Science Guidelines.
K. Existing MPA meets minimum size and LOP requirements. Proposed action increases the amount of habitat(s) protected but additional Science Guidelines are not met. Proposed action improves the design of the individual MPA but not of the MPA Network, and does not enhance alignment with the Science Guidelines.
L. Both existing MPA and as proposed meet minimum size and LOP requirements. Proposed action does not improve the design of the individual MPA or the MPA Network, nor does it enhance alignment with the Science Guidelines.

Question 10a: Does the proposed change align with CDFW Feasibility Guidelines?

CDFW Feasibility Guidelines

Question 14: Does the proposed change provide more equitable access opportunities (e.g., fishing, educational, and/or other recreational opportunities) for traditionally underserved or marginalized communities?

CDFW is committed to improving access to marine resources in California for traditionally underserved and marginalized communities. This question was included in the evaluation framework because of that commitment, as well as input from partners to prioritize improvement of accessibility and recommendations from the Decadal Management Review (DMR) to integrate justice, equity, diversity, and inclusion

principles into MPA management. However, after exploration of the available information and methods that could be used to address this question for each proposed action, CDFW determined that providing the level of evaluation this question and the relevant communities deserve was not possible within the scope of the petition evaluations. Most of the petitions did not include sufficient information to accurately assess benefits and/or impacts to historically marginalized and underserved communities. Additional details and outreach are needed by petitioners to support this portion of the analysis.

Additionally, in evaluating this question, CDFW reviewed multiple information sources, and found there are many different approaches to defining and identifying "traditionally underserved or marginalized communities." CDFW reviewed the definition of disadvantaged communities (DACs) in Senate Bill 535; which is based on pollution burden and federally recognized tribal status (a map of DACs per this definition is available here, data used to determine community status is available through the CalEnviroScreen tool). Using excess pollution burden to define and identify disadvantaged communities has some applicability to the MPA Network, such as concerns related to water quality. However, it did not seem like the most appropriate approach for defining and identifying "traditionally underserved or marginalized communities" or evaluating issues related to accessing fishing, recreation, or educational opportunities in the context of the MPA Network.

CDFW considered the definition of DACs utilized by the California Department of Water Resources, where DACs are areas where median annual household income is 80% or less of the statewide median annual household income (a map of those communities is available here). However, when examined spatially, this definition covers much of the area of the state, making it difficult to identify discrete communities.

CDFW found the data and information in the California Governor's Office of Land Use and Climate Innovation's Vulnerable Communities Platform would likely be the best to help understand access issues related to the MPA Network. The Vulnerable Communities Platform provides information on more specific and potentially applicable metrics, such as food insecurity and linguistic isolation, which could be used to better understand access issues (e.g., subsistence fishing, language access for outreach materials, individual indicators data is available here). However, using this information would require a determination of the most appropriate criteria to identify objective thresholds to define traditionally underserved or marginalized communities.

Given that lack of sufficient information on benefits to historically marginalized and underserved communities in the petitions as filed, CDFW will continue to work with tribes and other partners on a broader approach outside of the narrow scope of this petition process to assess access and equity issues across the entire MPA Network. This

includes working on DMR Recommendation 8, to "Evaluate the accessibility of MPAs to various community groups." Through this separate process, CDFW could work collaboratively with communities and partners, including to align on:

- A definition of "traditionally underserved or marginalized communities" in the context of the MPA Network or access to marine resources, developed with and for communities,
- Barriers to access experienced by these communities related to access to marine resources and/or MPAs, and
- Methods by which those barriers may be mitigated.

Question 16: Is the proposed change consistent with the CFGC Justice, Equity, Diversity and Inclusion Policy?

California Fish and Game Commission (CFGC) staff conducted this analysis and prepared the response to Question 16.

Justice, Equity, Diversity and Inclusion Policy Overview

The California Fish and Game Commission's (CFGC) Justice, Equity, Diversity and Inclusion Policy (JEDI Policy) reflects CFGC's deep commitment and responsibility to support safe and equitable access to California's thriving native wildlife and natural habitats, supported by inclusive decision-making that reflects the needs and values of the state's diverse communities. The policy acknowledges the significant past injustices experienced by historically marginalized and underserved communities and seeks to correct the burdens these communities have faced in accessing nature, participating in regulatory decision-making, and the privilege often associated with outdoor access. The JEDI Policy also considers and seeks to correct the disproportionate burdens on California Native American tribes and recognizes their interwoven stewardship relationships with the environment.

The JEDI Policy identifies 13 individual commitments referred to as "actions" that guide how CFGC advances its JEDI commitments. Implementation of the policy has been an ongoing priority of CFGC since its adoption in February 2022 and CFGC staff are continuing to explore meaningful ways to meet its commitments. Inclusion of the JEDI Policy in the evaluation framework was intended to highlight this commitment.

Evaluation of MPA Petitions

Evaluating MPA petitions for their consistency with CFGC's JEDI Policy marked the first time CFGC staff attempted to systematically apply the policy's principles to inform CFGC decision-making. Through the process of evaluating MPA petitions against the JEDI Policy, CFGC staff found it was unable to make determinations about whether, or to

what extent, any specific petition advances or conflicts with the JEDI Policy. The findings are described in detail here, along with next steps to resolve these limitations moving forward.

CFGC staff reviewed the pending MPA petitions to identify conceptual intersections with JEDI principles. Of the 13 commitments in the policy, 7 are not relevant to the evaluation because they focus on internal operations, partnerships, and governance processes. The remaining 6 are directly applicable to the MPA petitions:

- Considering and correcting for disproportionate burdens on historically marginalized communities,
- Improving responsiveness to the needs of marginalized fish and wildlife users;
- Amplifying tribal voices and issues,
- Considering the implications of decisions on subsistence activities,
- Improving and championing safe and equitable access to abundant and healthy fish and wildlife populations, and
- Promoting cultural, community, and economic opportunities related to fish and wildlife that CFGC regulates.

In seeking to apply the six applicable commitments, staff identified several knowledge gaps that limited its ability to provide consistent or objective petition-level JEDI determinations. Ultimately, CFGC staff concluded that there is insufficient information available to meaningfully assess potential JEDI-related implications of petitions in a manner that reflects the intent of the policy.

Key concepts such as subsistence activities, equitable access to abundant fish and wildlife populations, and cultural, community and economic opportunities do not have Commission-adopted definitions, metrics, or measurable criteria. Without clearly articulated definitions, datasets, or rubrics, petition-specific JEDI assessments would be inherently speculative. Staff has, however, gained a clearer understanding of these gaps, which will be important to address in future policy implementation.

Tribally-Led Petitions

One area that CFGC has already recognized is the distinct role of petitions that amplify tribal voices, which is reflected in how CFGC has grouped these petitions for discussion. Five petitions were submitted either by a tribe or with tribal participation as co-sponsors for petitions submitted by non-tribal proponents; CFGC has grouped these as “Tribally-led,” which includes tribally cosponsored petitions. Some of these petitions advance tribally identified MPA names and, in some cases, include recommendations related to pursuing co-management or co-stewardship. Collectively, they reflect the

interests of federally recognized tribes as well as non-federally recognized tribal communities with enduring relationships to California's coast. Many of these proposals have the potential to foster long-term partnerships or shared leadership with California Native American tribes, which are considered marginalized and/or underserved communities, supporting the broader intent of CFGC's JEDI Policy.

Petitioner Intent

CFGC staff acknowledges that several petitions explicitly reference, within their petition rationale(s), goals related to equitable access, subsistence activities, long-term abundance of fish and wildlife, or other JEDI-related intentions. While the stated intentions are important context, the previously-described evaluation limitations prevent staff from assessing the degree to which these intentions may achieve the goals. CFGC staff acknowledges that changes to harvest or non-consumptive access may relate to subsistence or equity considerations, but cannot reliably characterize the nature or extent of those relationships without risking over-generalization or speculation.

Current and Future Focus

In the absence of the tools needed for petition-level JEDI analysis, and because many JEDI commitments were intended primarily to guide CFGC processes, CFGC staff has begun to focus on the overall petition process, including planning for regional MPA petition meetings. CFGC staff efforts have included: consulting with partners to inform development of approaches to support safe and inclusive participation; selecting meeting locations near affected communities to reduce travel barriers; elevating tribal voices; increasing transparency about meeting format and expectations; and exploring additional ways to provide accessible engagement opportunities. The regional meetings are an opportunity for CFGC to engage with local communities regarding MPA petitions. Proposals that reflect community knowledge, lived experience, and local needs align more closely with the inclusive decision-making envisioned by the JEDI Policy. Public comments emphasizing the level of community engagement, or lack thereof, were not considered when conducting the petition evaluations.

Evaluation of the MPA petitions has highlighted critical next steps needed to strengthen CFGC's ability to apply the JEDI Policy in future evaluations. Consistent with the intent of Recommendation 8 in CDFW's Marine Protected Area Network Decadal Management Review — a mid-term priority focused on evaluating the accessibility of MPAs to various community groups — staff recognizes that broader collaborative efforts with various partners will be needed to establish the foundational elements for integrating JEDI considerations across the MPA Network. Advancing this work will support both the

CFGC's JEDI Policy goals and more meaningful future evaluations, beyond what is possible within the limited scope of this petition process.

Links

JEDI Policy: California Fish and Game Commission Justice, Equity, Diversity, and Inclusion Policy, approved February 16, 2022

JEDI Policy Definitions: California Fish and Game Commission JEDI Definitions

Question 17: Is the proposed change consistent with the CFGC Coastal Fishing Communities Policy?

CFGC staff conducted this analysis and prepared the responses to Question 17 for the proposed actions in the evaluations. CFGC staff provided this additional context for their evaluations of Question 17.

Coastal Fishing Communities Policy Overview

The CFGC Coastal Fishing Communities (CFC) Policy guides CFGC, in partnership with CDFW, in supporting the long-term needs, social well-being, and economic health of California's coastal fishing communities while upholding the conservation and management goals central to both agencies' missions and mandates. The CFC Policy defines coastal fishing communities broadly as: (a) social, cultural, economic, and/or place-based groups whose members are dependent upon, engaged in, or benefit from local, wild-capture, commercial, recreational, or subsistence marine harvest or processing to meet the social and economic needs of the community; (b) include, but are not limited to, the businesses and organizations that depend upon or support those activities; and (c) may be a subset or member of larger or associated coastal communities. Adopted in February 2024, the CFC Policy formalizes a vision for how CFGC engages with fishing communities, incorporates their needs into decision-making, and contributes to their resilience.

Evaluation of MPA Petitions

Evaluating MPA petitions for their consistency with CFGC's CFC Policy marked the first time CFGC staff has attempted to apply the policy's principles to inform CFGC decision-making. Through the process of evaluating MPA petitions against the policy, CFGC staff found it was unable to make determinations about whether, or to what extent, any specific petition advances or conflicts with the goals of the CFC Policy. The findings are described in detail here, along with next steps to resolve these limitations moving forward.

The goal of Question 17 is to identify where petitioned actions may conceptually intersect with the CFC Policy—not to evaluate biological outcomes addressed elsewhere in the petition evaluation framework or provide a full socioeconomic analysis.

As CFGC staff applied the CFC Policy to each petition and its proposed actions, it became clear that only limited information is currently available to assess potential implications for coastal fishing communities. The policy encompasses broad aims, such as maintaining or enhancing fishing opportunities, supporting community resilience and adaptive capacity, and ensuring coastal fishing community interests are meaningfully factored into CFGC decision-making.

However, CFGC does not yet have detailed economic, demographic, or cultural data to determine how proposed regulatory changes may affect specific coastal fishing communities. Existing statewide information—primarily the Ocean Sport Fishing web application and community profiles from FishingCommunities.net, last updated in 2023 using 2021 data—provides useful general context on ports, landings, and community characteristics. CFGC staff expertise and experience also contributed to the understanding of impacts of petitioned actions on nearby coastal fishing communities. These sources of information do not provide the level of resolution necessary to draw conclusions about individual community dependence, vulnerability, or long-term resilience.

Given the limitations, CFGC staff focused the evaluation on three elements that could be consistently and objectively applied across all petitions:

- Describes the nature of the proposed regulatory change,
- Identifies whether a petition action would increase, decrease, or have no direct effect on commercial or recreational fishing opportunity within or near the affected MPA, and
- Identifies the coastal fishing communities most geographically-proximate to the affected area, by identifying the nearest ports or harbors and travel distance between them, although these do not necessarily reflect smaller coastal fishing communities that may be affected.

Some petition actions were given “not applicable” responses, reflecting that those actions are not subject to evaluation as they are either not regulatory change requests or they are proposals outside of the regulatory framework for MPA management.

Some petitions propose increasing fishing opportunities, which could conceptually support short- or long-term community resilience within the context of California’s existing fishing regulations and the broader fisheries management goals, and other petitions propose strengthening or expanding MPAs, which may confer long-term

ecological benefits that indirectly support fishing communities. However, CFGC staff cannot evaluate the proposed changes on biological, stock-related, or long-term effects relative to supporting fishing opportunities under this question.

A full understanding of potential benefits or impacts to coastal fishing communities requires meaningful input from the community members themselves—commercial, recreational, and subsistence harvesters, as well as the businesses and organizations that support local fishing economies. CFGC staff view this evaluation as an initial step based on the information currently available, and not as a comprehensive assessment of the lived experience, priorities, or needs of individual communities. Public comments that provide such feedback have not been directly considered in the evaluation. While CFGC has received a wealth of public comments to inform its understanding of the range of views thus far, CFGC's upcoming regional MPA petition review meetings will provide an important opportunity for commenters to further supplement CFGC staff's analysis with direct feedback from those most connected to the affected areas. Continued dialogue with coastal fishing communities will help strengthen the foundation for applying the CFC Policy in future decision-making and improve CFGC's ability to better understand and support the adaptive capacity and long-term resilience of California's fishing communities over time.

Possible next steps in policy implementation and pathways to begin filling data gaps is anticipated for discussion at a future CFGC Marine Resources Committee meeting. This discussion ideally would lead to developing options and needs to enable integrating consideration of the CFC policy into CFGC's decision-making.

Links

CFC Policy: California Fish and Game Commission Coastal Fishing Communities Policy, adopted February 14, 2024 (also included on the following page)

Current Regulations Map: Ocean Sport Fishing Web App

Partner website, California Fishing Communities, providing profiles of the history, economics, and culture of California's fishing communities (last updated in 2023 with 2021 data): FishingCommunities.net

SUMMARY OF OTHER CONSIDERATIONS

After completing the evaluations, none of the petition evaluations had information to include in this section beyond what was provided in the other five sections of the evaluation. Consequently, this section was removed from the evaluations.

2023 BIN 2 MPA PETITIONS

Evaluations and Recommendations for Non-Tribally Led Petitions

Dr. Craig Shuman, Marine Regional Manager
CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

April 15, 2026

CALIFORNIA MARINE PROTECTED AREAS

Marine Life Protection Act

- Landmark legislation passed in 1999
- "California's MPAs were established on a piecemeal basis rather than according to a coherent plan and sound scientific guidelines…creates the illusion of protection…" FGC §2851 (a)
- Six MLPA Goals Fish & Game Code section 2853(b)
- Two unsuccessful attempts to implement in 2001 and 2002

N. Perkins

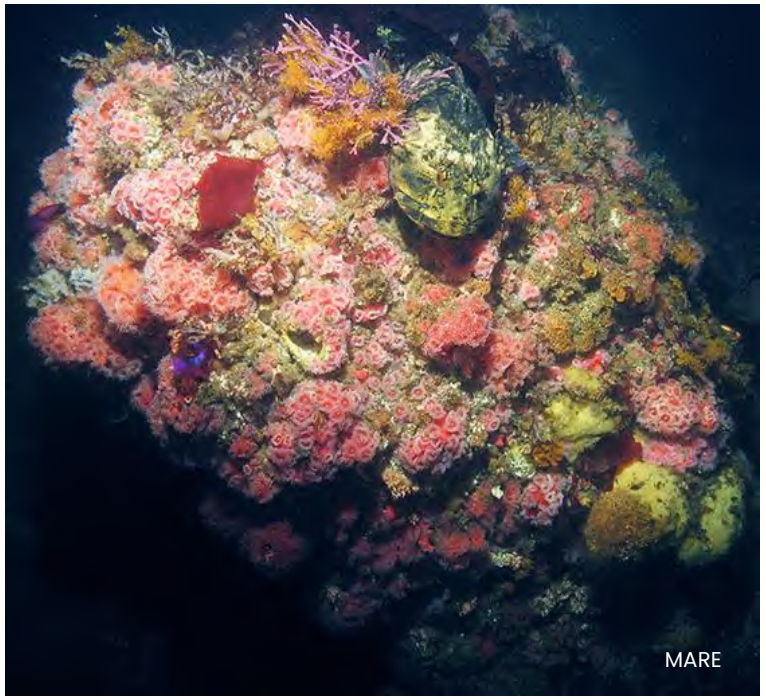
CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

Marine Life Protection Act Initiative

Public-Private Partnership formed in 2004

- Central Coast: 2005-2006
- North Central Coast: 2007-2008
- South Coast: 2008-2009
- North Coast: 2009-2011



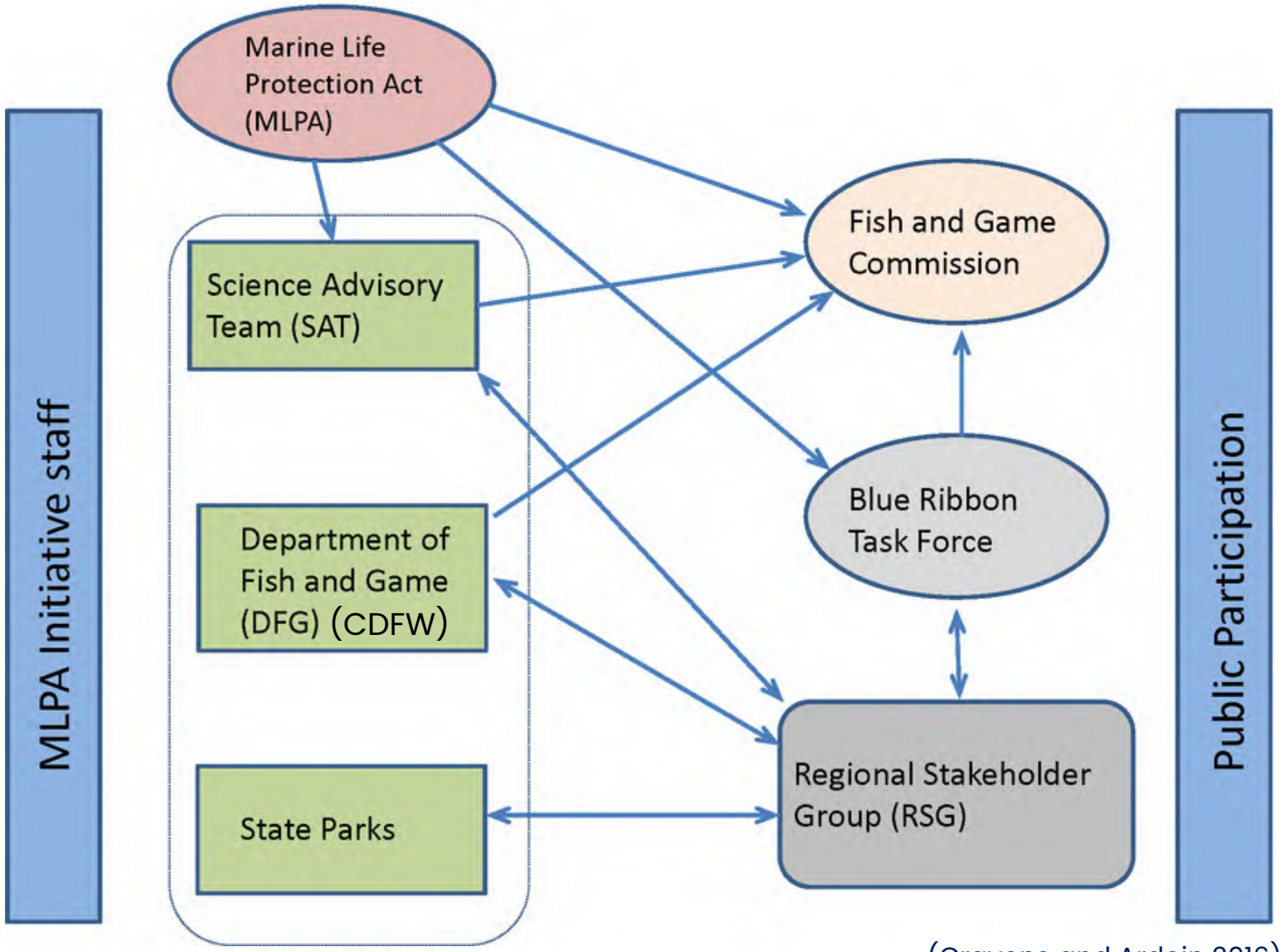
CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

Marine Life Protection Act Initiative (cont.)

BRTF, CDFW

Central Coast RSG, CDFW



(Cravens and Ardoin 2016)

Importance of Iteration

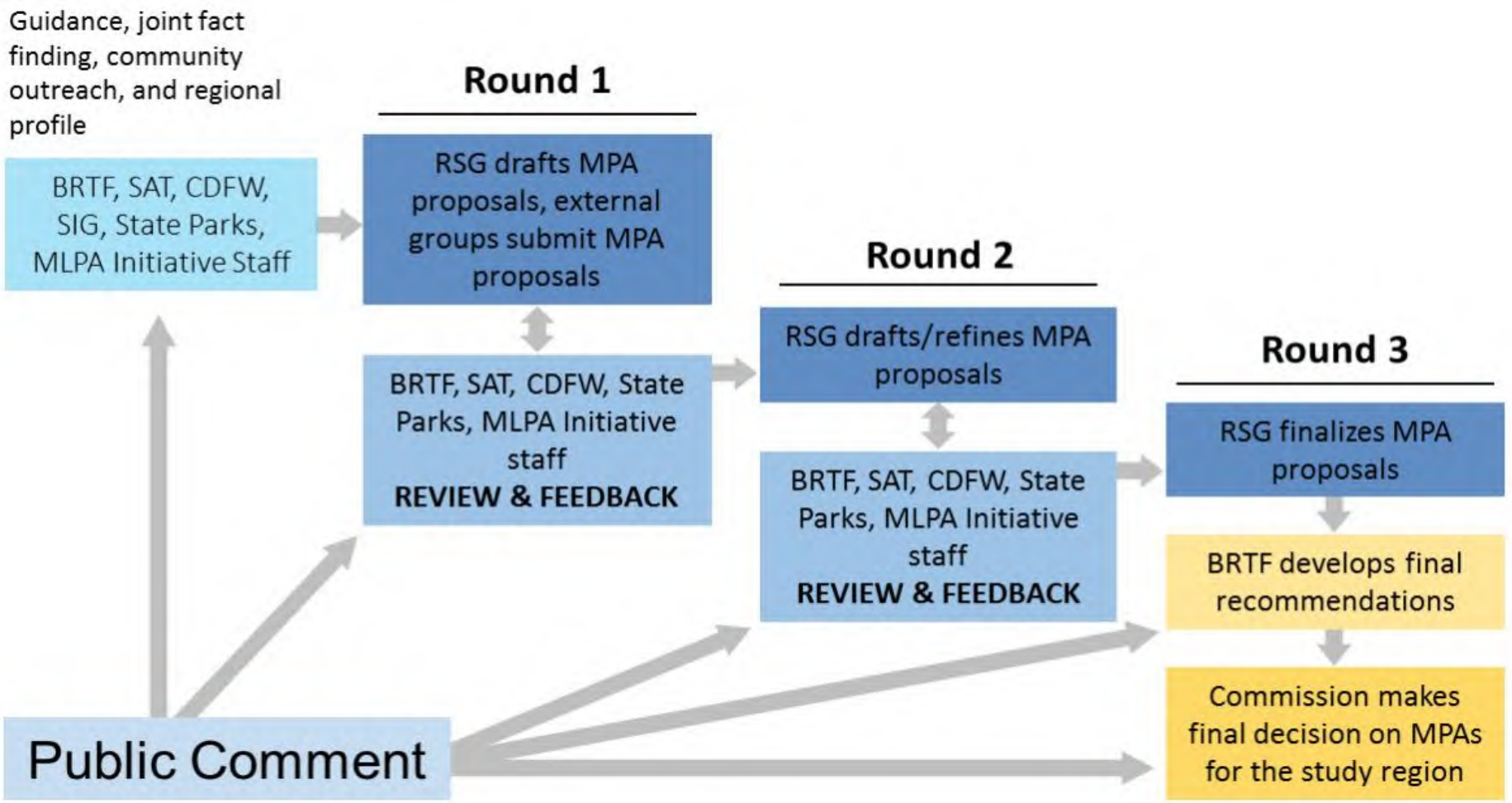
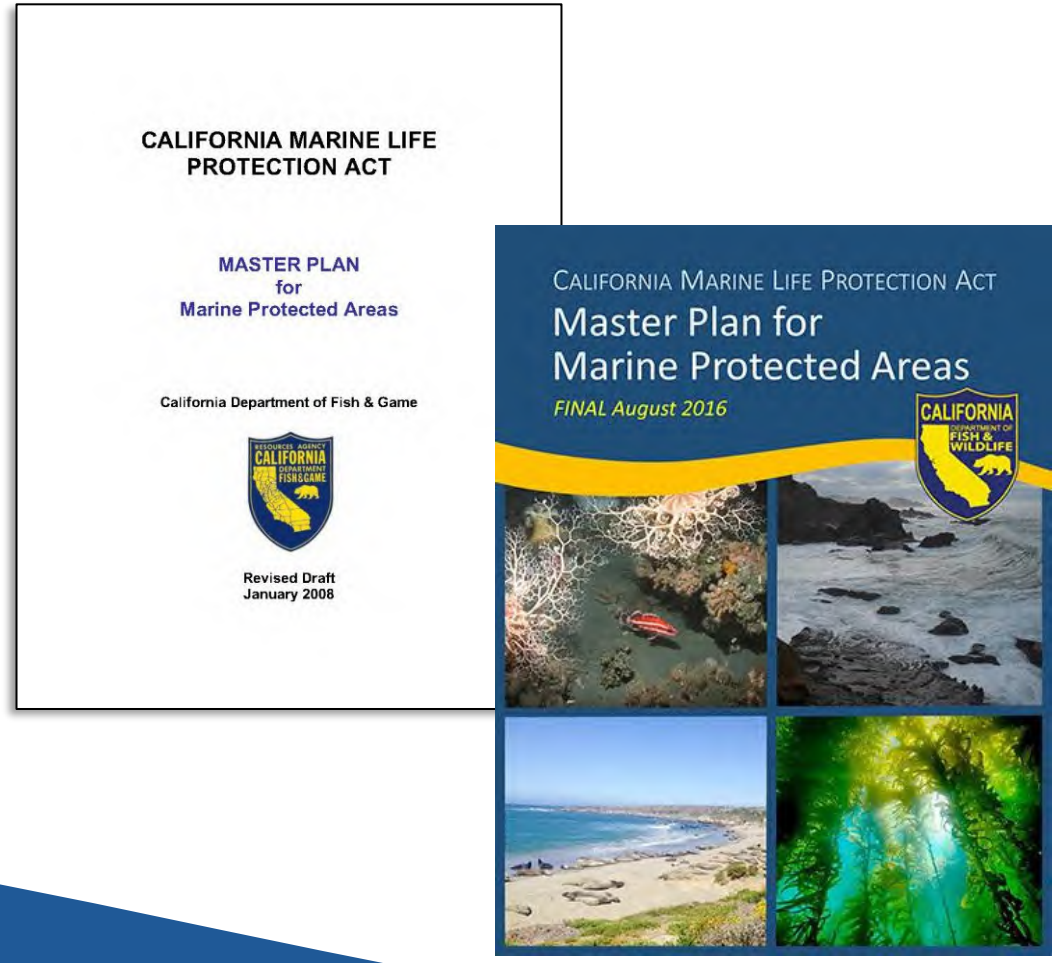


Figure 5. General process used by the MLPA Initiative to develop alternative MPA proposals in each regional MPA planning process or planning region.

Adaptive Management of the MPA Network

Master Plan for MPAs:

- 2008
- 2016
  - Outreach and Education
  - Research and Monitoring
  - Enforcement and Compliance
  - Policy and Permitting



CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

Regional Management Reviews

- Channel Islands: 2008
- Central Coast: 2013
- North Central Coast: 2015
- South Coast: 2017
- North Coast: 2018

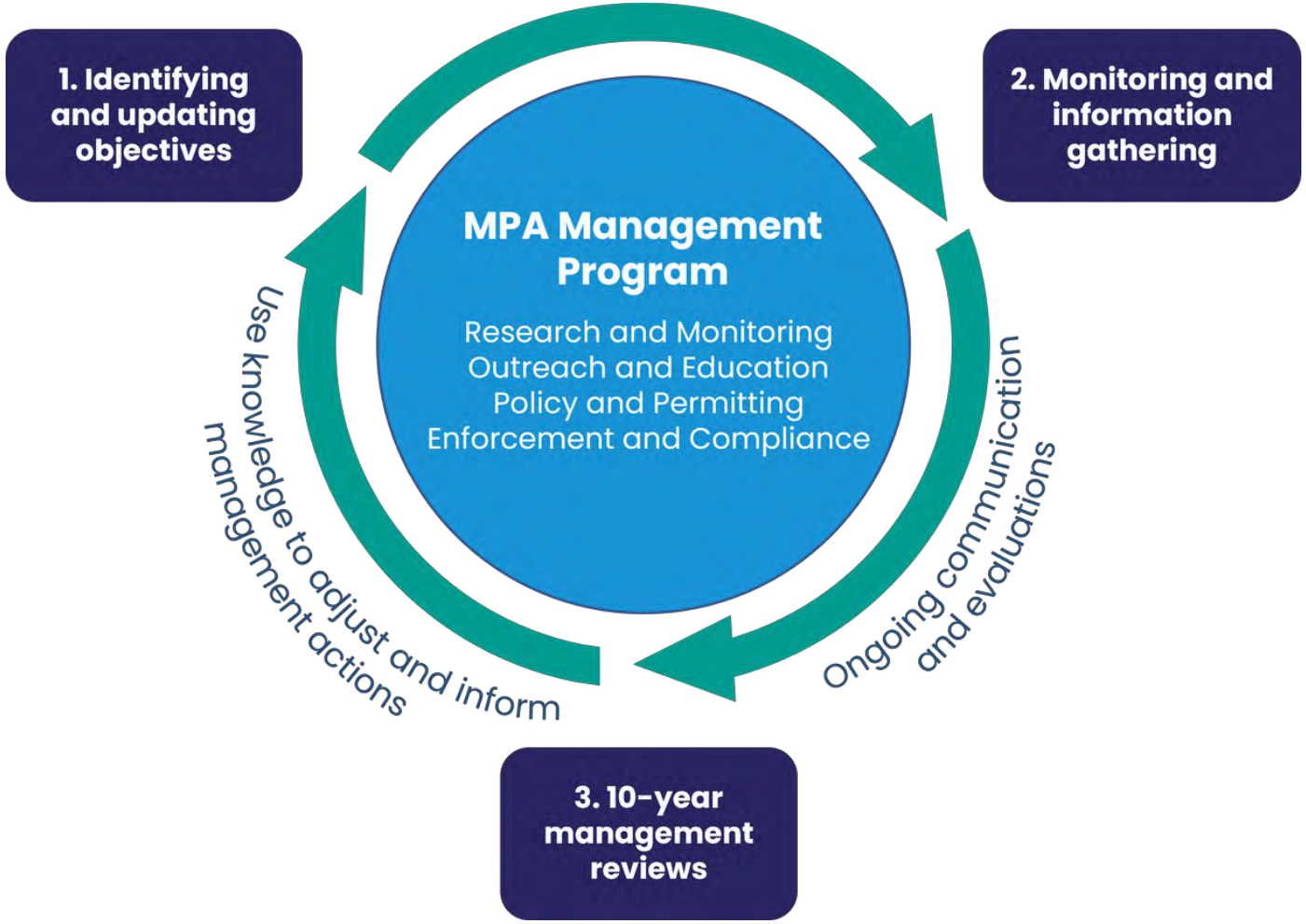
CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

MPA Network Management

Adaptive Process

- Long-term scientific monitoring
- Periodic Review: data expertly evaluated
- Ongoing, across all Management Pillars
  - Regulatory
  - Non-regulatory



Adaptive Management Regulatory Amendments

- 2014: Clean-up package*
- 2015: Clean-up package*
- 2016: Tribal take allowance
- 2018: Repeal of special closure due to private property issue
- 2018: Tribal take allowance, boundary modification
- 2022: SMRMA language clean-up
- 2023: Pre-existing structures

* General provisions, definitions, take, boundaries

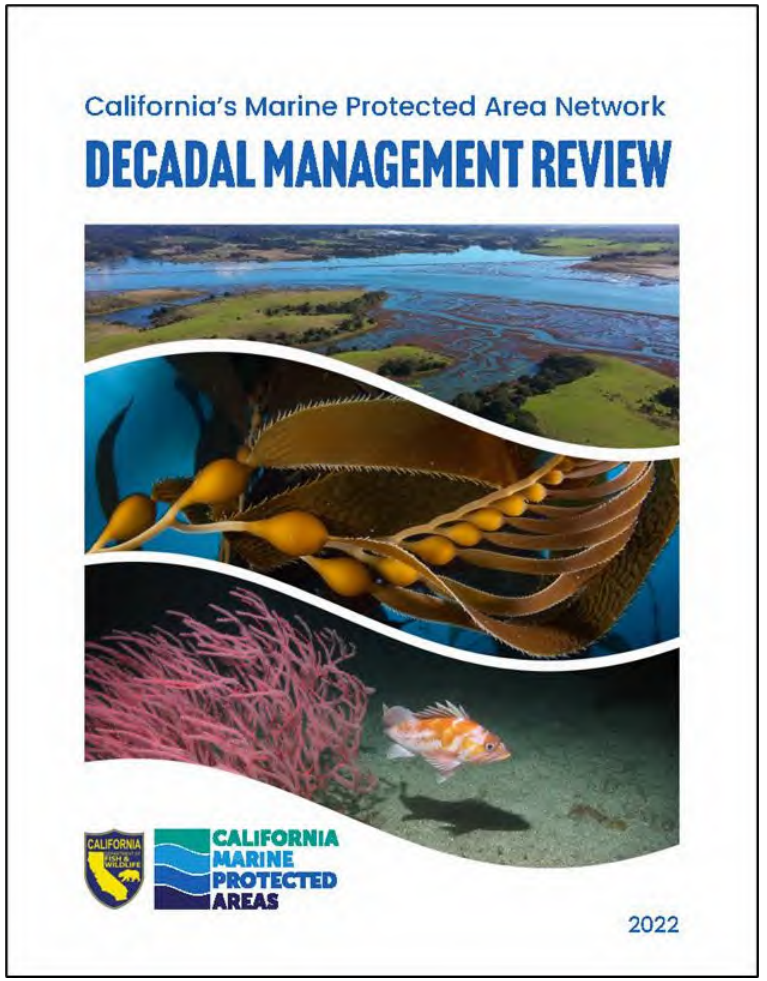
Amanda Van Diggelen CDFW

CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

Decadal Management Review Key Findings

- For some species and habitats, MPAs support populations of larger and/or more abundant fish and invertebrates
  - Results vary across bioregions, habitats, and other factors
- Evidence of enhanced connectivity, ecosystem integrity, and resilience
  - MPA Network is still young, more to learn
- Did not identify performance gaps that warrant significant structural modification
- Informed 28 priority recommendations
  - ~80 specific actions



DMR Adaptive Management Recommendations

Near-Term (ongoing – 2 years)

- Rec 1: Improve state agencies tribal engagement
- Rec 4: Apply Review knowledge to Network/Management changes
- Rec 7: Expand outreach and education materials
- Rec 9: Continue OPC coordination
- Rec 10: Improve coordination across Management Program pillars
- Rec 11: Update Action Plan
- Rec 16: More targeted outreach to specific audiences
- Rec 17: Improve SCP process
- Rec 18: Use policy to review MPA restoration/mitigation efforts
- Rec 20: Increase enforcement capacity
- Rec 21: Enhance citation record keeping and management
- Rec 25: Implement MPA climate change research
- Rec 27: Improve understanding of MPA effects on fisheries

Mid-Term (2 – 5 years)

- Rec 2: Create pathway to tribal MPA management
- Rec 3: Build tribal capacity to participate in MPA management
- Rec 6: Include and fund more diverse researchers and stakeholders
- Rec 8: Evaluate MPA accessibility
- Rec 12: Improve understanding of human dimensions
- Rec 13: Explore innovative technologies
- Rec 14: Develop MPA community science strategy
- Rec 15: Evaluate Outreach needs and resource effectiveness
- Rec 22: Increase knowledge on MPA judicial outcomes
- Rec 23: Examine MPA Network design attribute more effectively
- Rec 26: Consider climate change in human dimensions monitoring
- Rec 28: Integrate influencing factors into MPA performance evaluations

Long-Term (5- 10 years)

- Rec 5: Establish targets to meet MLPA goals
- Rec 19: Create MPA Enforcement Plan
- Rec 24: Better incorporate marine cultural heritage into MPA Network

2023 MPA Petition Process Milestones

Date	Milestone
Aug 2023	California Fish and Game Commission (CFGC) approves prioritization framework and to consider changes to the MPA Network using the existing CFGC petition process
Oct 2023	CFGC releases "Overview of Process to Consider Potential Changes to California's MPA Network"
Dec 2023	CFGC receives 20 MPA-related petitions with 80+ actions
Feb 2024	CFGC refers all 20 petitions to CDFW for evaluation
Apr 2024	CFGC adopts 3-phased approach to petition evaluation

2023 MPA Petition Process Milestones (2/3)

Date	Milestone
Aug 2024	CFGC approves binning petitions, requests CDFW evaluate Bin 1 petitions and develop a proposed framework to evaluate Bin 2 petitions
Nov 2024	CDFW releases recommendations for five Bin 1 petitions
Dec 2024	CFGC makes decisions on Bin 1 petitions and establishes March 14, 2025 deadline for amendments to Bin 2 petitions
Mar 2025	Deadline for amendments to Bin 2 petitions
Apr 2025	CFGC refers amended Bin 2 petitions to CDFW for evaluation
Apr–May 2025	CDFW develops Draft Bin 2 Petition Evaluation Framework with Ocean Protection Council and CFGC staff

2023 MPA Petition Process Milestones (3/3)

Date	Milestone
May 2025	Update and discussion at CFGC TC on Bin 2 MPA petitions and proposed approach for evaluations
Aug 2025	• Update and discussion on MPA petitions and Draft Eval Framework at CFGC TC • CFGC TC identifies four Tribally-led petitions • CFGC approves framework for evaluating Bin 2 petitions
Dec 2025	Update and discussion at CFGC TC on Bin 2 MPA petitions; identifies one more Tribally-led petition; directs CDFW to come back to April 2026 CFGC TC to discuss MPA Petitions
Mar 2026	CDFW releases evaluations and Companion Document for the ten non-Tribally-led Bin 2 MPA Petitions for the 64 proposed actions
Apr 2026	Update and discussion at CFGC TC on Bin 2 MPA petitions

2023 MPA Bin 2 Petition Evaluation Framework

CGFC Approved August 2025, includes:

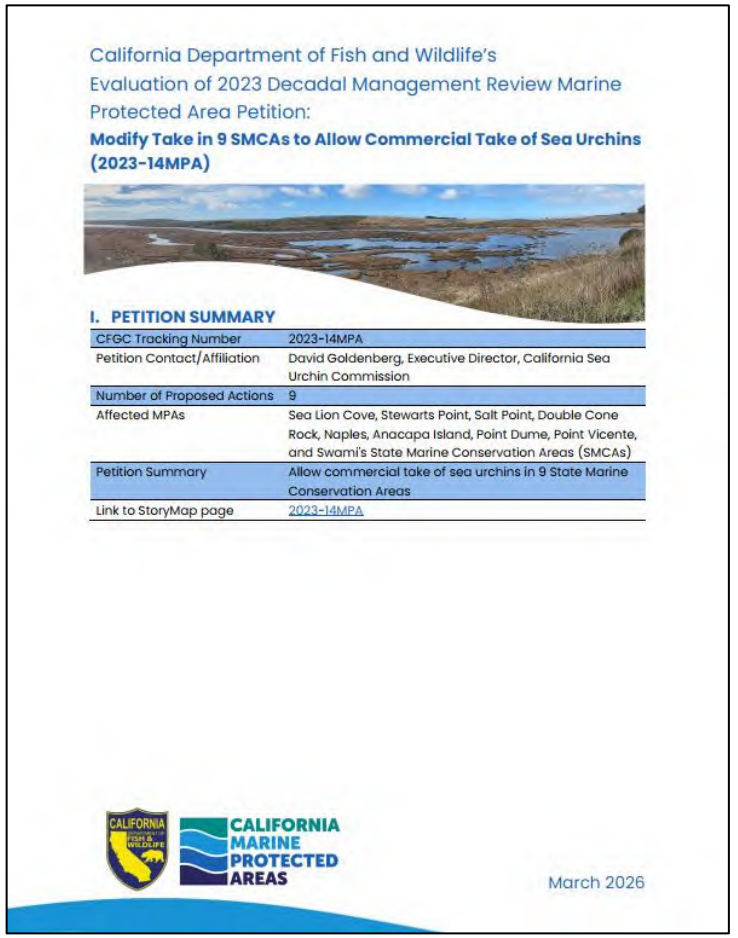
I. Petition Summary

II. CDFW Recommendations with Brief Justifications

III. Bin 2 Petition Grouping: Identify Tribally-led Petitions

IV. CDFW 2023 MPA Bin 2 Petition Narrative and Evaluation

V. Supplemental Analyses, Data and Information, and Citations



California Department of Fish and Wildlife's Evaluation of 2023 Decadal Management Review Marine Protected Area Petition:

Modify Take in 9 SMCAs to Allow Commercial Take of Sea Urchins (2023-14MPA)

I. PETITION SUMMARY

CFGC Tracking Number	2023-14MPA
Petition Contact/Affiliation	David Goldenberg, Executive Director, California Sea Urchin Commission
Number of Proposed Actions	9
Affected MPAs	Sea Lion Cove, Stewarts Point, Salt Point, Double Cone Rock, Naples, Anacapa Island, Point Dume, Point Vicente, and Swami's State Marine Conservation Areas (SMCAs)
Petition Summary	Allow commercial take of sea urchins in 9 State Marine Conservation Areas
Link to StoryMap page	2023-14MPA

CALIFORNIA MARINE PROTECTED AREAS

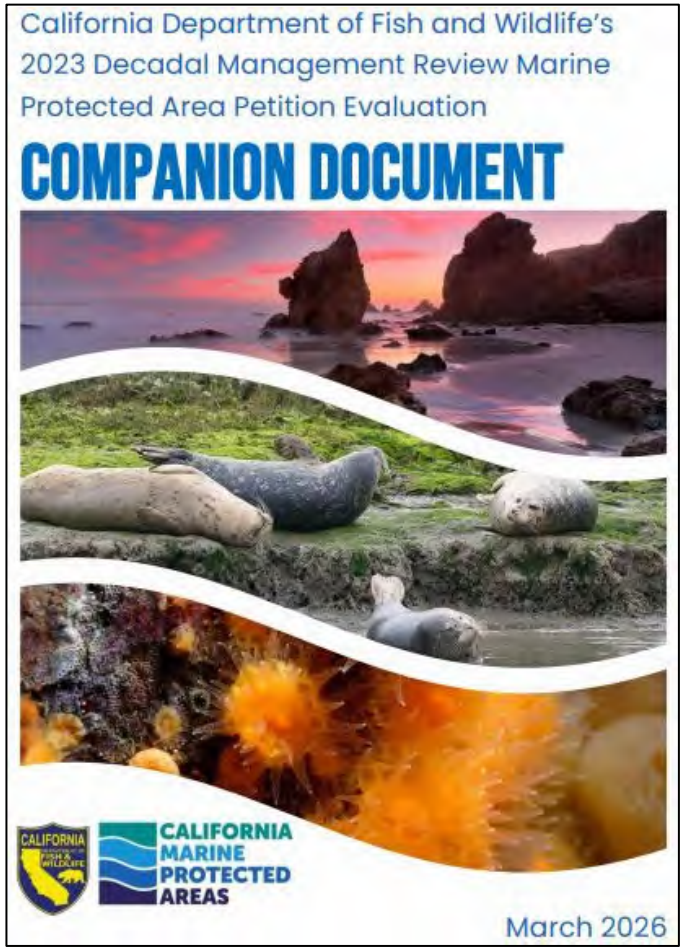
March 2026

CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

2023 MPA Bin 2 Petition Evaluation Companion Document

- History of MPA Network Adaptive Management
- Summary of tribal outreach and engagement
- Supplemental information, reference materials, and additional context for evaluations



CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

Tribally-led Petitions

- Submitted by a California Native American tribe, representative designated by a tribe or tribal organization, or has a tribal co-sponsor.
- CDFW update provided at the April 14th CFGC Tribal Committee meeting, go to https://fgc.ca.gov/Meetings/2026 for more information.
- These five petitions (19, 20, 21, 28, and 29) are not included in this presentation.

CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

Presentation Format

- **Petitions presented in numeric order**
- **Two Formats**
  - Single slide: petitions with a single proposed action or group of similar actions
  - Multiple slides: petitions with multiple proposed actions
- **Content**
  - Title of petition/proposed action(s)
  - Summary of proposed action(s)
  - Petitioner rationale
  - CDFW Recommendation

CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

2023-14MPA: Modify Take in 9 SMCAs to Allow Commercial Take of Sea Urchin

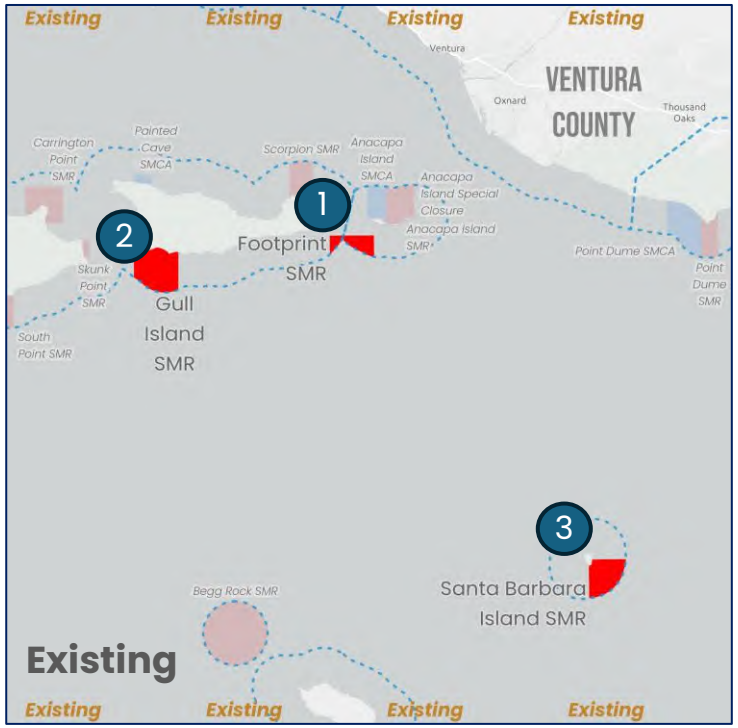
9 Proposed Actions Affecting:

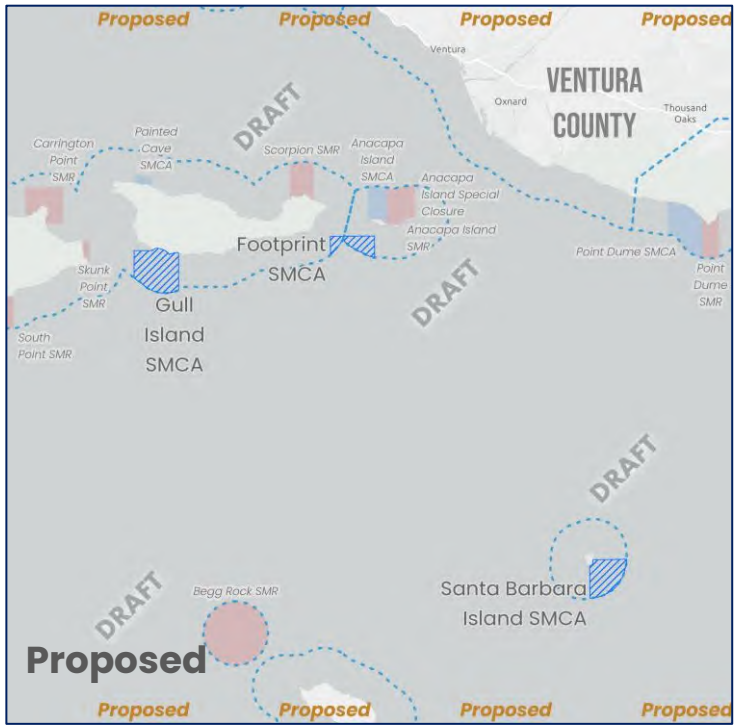
1. Sea Lion Cove SMCA
2. Stewarts Point SMCA
3. Salt Point SMCA
4. Double Cone Rock SMCA
5. Naples SMCA
6. Anacapa Island SMCA
7. Point Dume SMCA
8. Point Vicente No-take SMCA
9. Swami's SMCA

CDFW Recommendation:
DENY 2023-14MPA_1-9

2023-15MPA_AM: Reclassify Footprint, Gull Island, and Santa Barbara Island SMRs to SMCAs to Allow Take of Highly Migratory Species.

3 Proposed Actions: Reclassify 1. Footprint, 2. Gull Island, and 3. Santa Barbara Island SMRs to SMCAs to Allow Take of Highly Migratory Species.

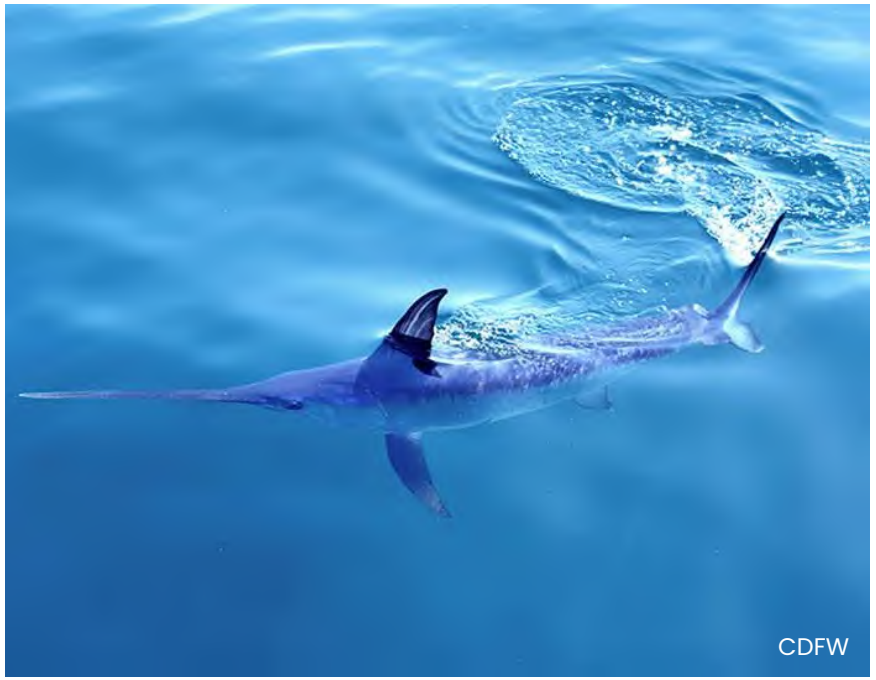




2023-15MPA_1-3_AM2: Reclassify Footprint, Gull Island, and Santa Barbara Island SMRs to SMCAs to Allow Take of Highly Migratory Species.

6 Petitioner Proposed Options:

Options	Recreational Take: Pelagic Finfish	Recreational Take: HMS	Commercial Take: Pelagic Finfish	Commercial Take: HMS	CPS
1	Hook and line, spear	N/A	Hook and line	N/A	N/A
2	N/A	Hook and line, spear	N/A	Hook and line	Possession
3	Hook and line, spear *no bottom contact	N/A	Hook and line *no bottom contact	N/A	N/A
4	N/A	Hook and line, spear *no bottom contact	N/A	Hook and line *no bottom contact	Possession
5	Spear	N/A	N/A	N/A	N/A
6	N/A	Spear	N/A	N/A	N/A



CDFW Recommendation:
DENY 2023-15MPA_1-3_AM2

2023-16MPA: Reclassify Stewarts Point and Bodega Head SMRs to SMCAs to Allow Commercial Salmon Trolling

2 Proposed Actions: Reclassify 1. Stewarts Point SMR and 2. Bodega Head SMR to SMCAs to Allow Commercial Salmon Trolling

CDFW Recommendation:
DENY 2023-16MPA_1-2

2023-18MPA: Modify Allowed Uses at Several Santa Barbara Channel MPAs and Special Closures: Vandenberg SMR, Kashtayit SMCA, and San Miguel and Anacapa Island Special Closures

Summary of 7 Proposed Actions:

1. Allow recreational take of finfish from shore in Vandenberg SMR

   (2022-04) Allow recreational fishing at Surf Beach within Vandenberg SMR

2. *Continue support of M2 Monitoring at Point Conception

3. Change take at Kashtayit SMCA

4. *Change color of No-take Campus Point SMCA from purple to red

5-7. Eliminate the San Miguel Special Closure and Anacapa Island Special Closure (Full Island), Reduce the size of the Anacapa Island Special Closure (Seasonal)

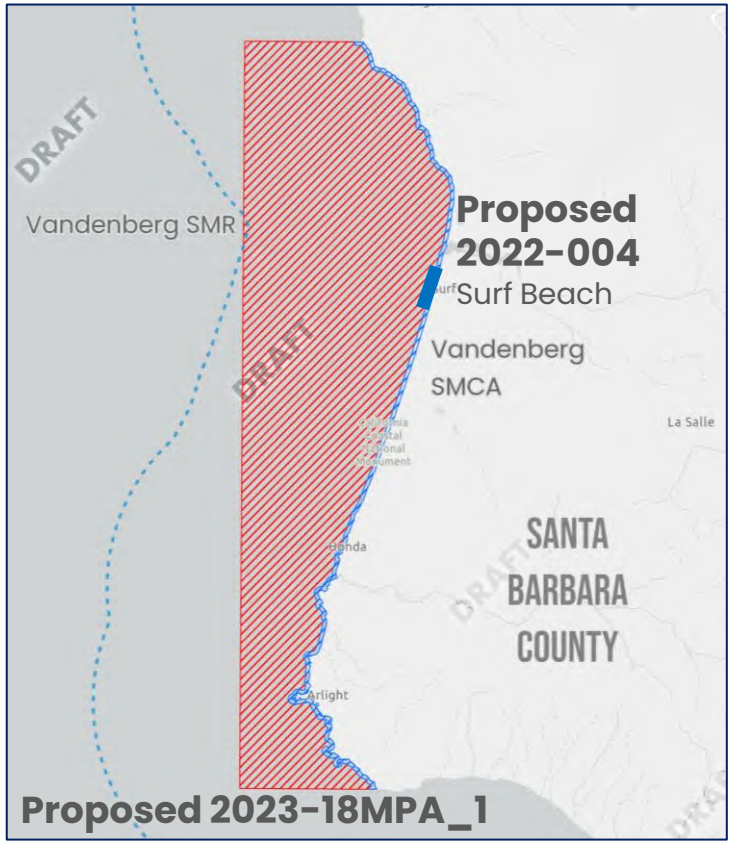
***Non-regulatory**

2023-18MPA_1 (and **2022-004):** Reclassify a portion of Vandenberg SMR to a SMCA with recreational take of finfish by hook and line from shore

Summary of Proposed Action:

1. Redesignate a portion of Vandenberg SMR to create a narrow SMCA alongshore for the entire length of Vandenberg SMR that allows recreational take of finfish by hook and line from shore.

   (2022-004): Redesignate a portion of Vandenberg SMR to create a small SMCA that allows shore fishing on the one half mile stretch of beach known as Surf Beach.



CDFW Recommendation:
DENY 2023-18MPA_1 and
DENY 2022-004

2023-18MPA_3: At Kashtayit SMCA, simplify take regulations to: "Recreational take of finfish, invertebrates, and giant kelp is allowed."

Summary of Proposed Action:

At Kashtayit SMCA, simplify take regulations to remove the strikethrough text in the following:

> *"Recreational take of finfish, invertebrates ~~(except rock scallops and mussels)~~, and giant kelp ~~by hand harvest~~ is allowed."*

CDFW Recommendation:
DENY 2023-18MPA_3

2023-18MPA_5-7: Eliminate San Miguel Special Closure; reduce size of Anacapa Island Special Closure and consider removing net/trap closure

Summary of Proposed Actions:

5. Eliminate pinniped special closure at San Miguel Island
6. Reduce the size of the brown pelican Anacapa Island Special Closure regulations to allow boat access to Frenchy's Cove
7. Reassess and consider removing the following special closure at Anacapa Island: "No net or trap may be used in waters less than 20 feet deep off the Anacapa Islands"

Z. Abbey

CDFW Recommendation:
DENY 2023-18MPA_5-7

2023-23MPA_AM: Modify Allowed Uses in Four Monterey Area MPAs, Create a New MPA, and Other Requests

Summary of 28 Proposed Actions:

1, 6, and 11. Prohibit recreational and commercial take of finfish when a petitioner-proposed "kelp restoration management permit" is active within 3 MPAs.

2, 7, 12, and 16. Allow unlimited recreational urchin removal in 4 MPAs.

3, 4, 5, 8, 9, 10, 13, 14, 15, 17, 18, and 19. Allow kelp out-planting , spore dispersal bags, and kelp pruning without an SCP.

20. Establish new Tanker's Reef SMR near Monterey.

23. *Restoration framework within MPAs and MMAs.

26. Allow commercial urchin harvest in MPAs.

28_AM1. *CFGC and CDFW promote kelp restoration collaboration on their website and in public outreach.

21, 22, 24_AM1, 25, and 27 Other Requests.

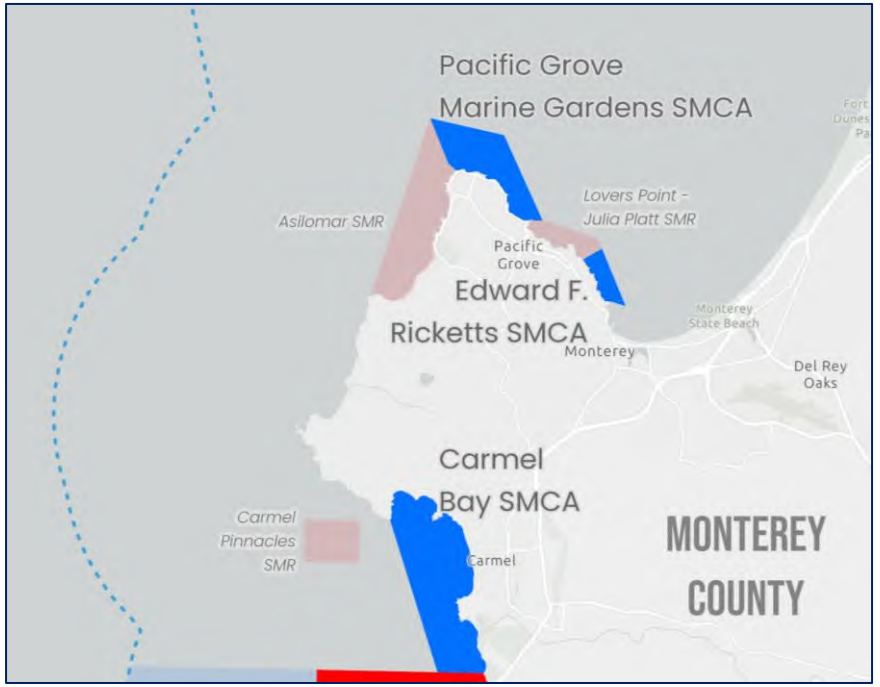
***Non-regulatory**

S. Wertz

2023-23MPA_1, 6, and 11 For diver safety, prohibit recreational and commercial take of finfish when a petitioner-proposed "kelp restoration management permit" is active.

3 Proposed Actions Affecting:

- Edward F. Ricketts SMCA
- Pacific Grove Marine Gardens SMCA
- Carmel Bay SMCA

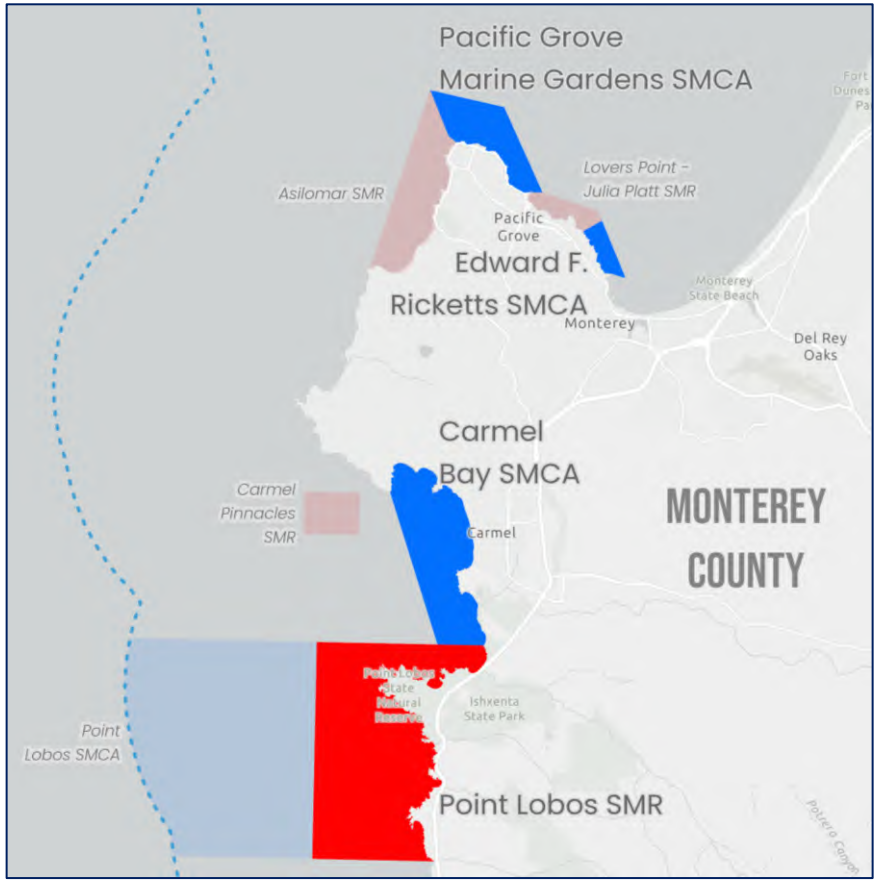


CDFW Recommendation:
DENY 2023-23MPA_1, 6, and 11

2023-23MPA_2, 7, 12, and 16 Allow unlimited recreational take of urchin.

4 Proposed Actions Affecting:

- Edward F. Ricketts SMCA
- Pacific Grove Marine Gardens SMCA
- Carmel Bay SMCA
- Point Lobos SMR

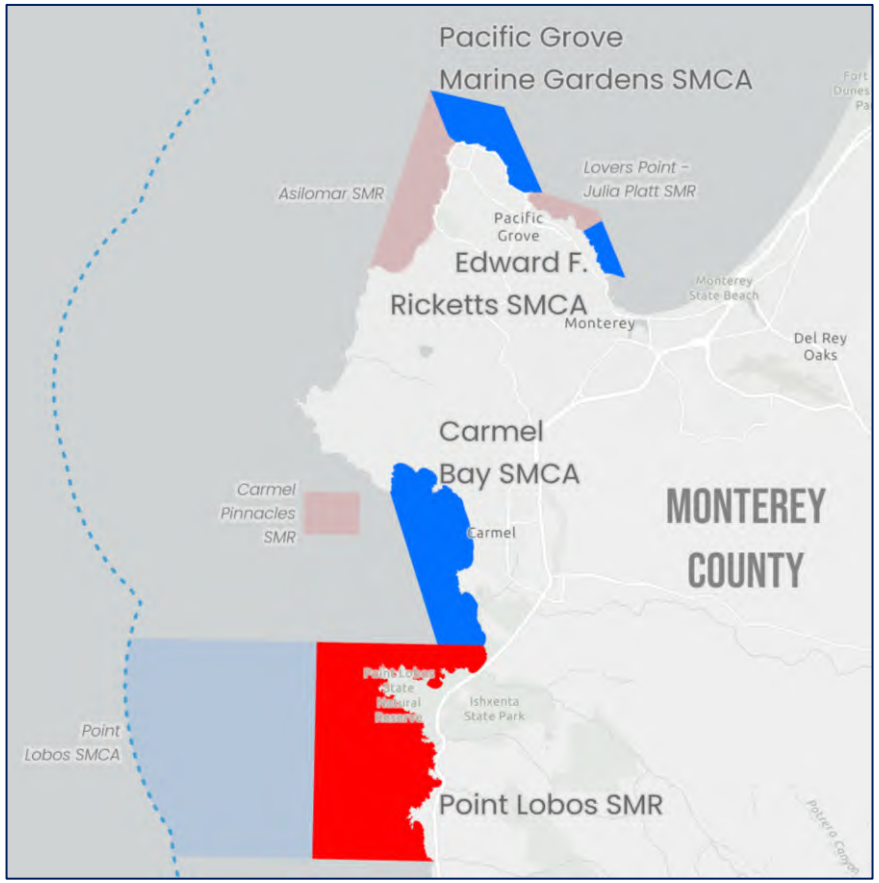


CDFW Recommendation:
DENY 2023-23MPA_2, 7, 12, and 16

2023-23MPA_3, 4, 5, 8, 9, 10, 13, 14, 15, 17, 18, and 19: Allow out-planting of kelp on the reef, spore dispersal by sporophyte bags, and pruning kelp canopy to promote growth and resilience to storms without an SCP.

12 Proposed Actions Affecting:

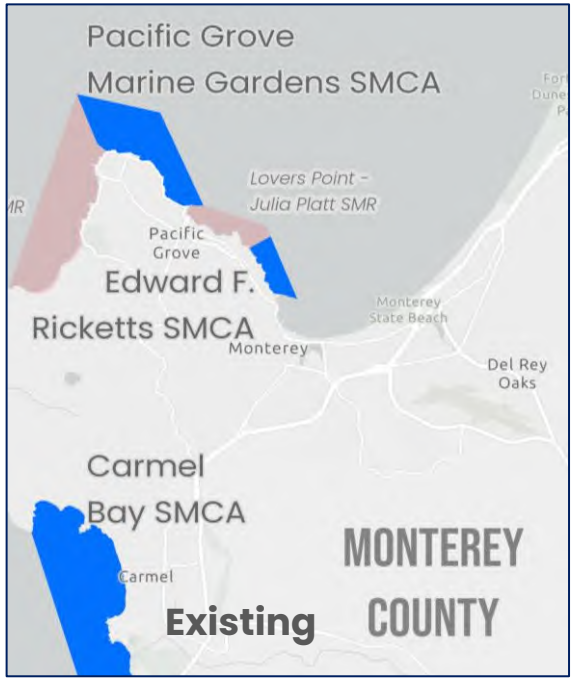
- Edward F. Ricketts SMCA
- Pacific Grove Marine Gardens SMCA
- Carmel Bay SMCA
- Point Lobos SMR

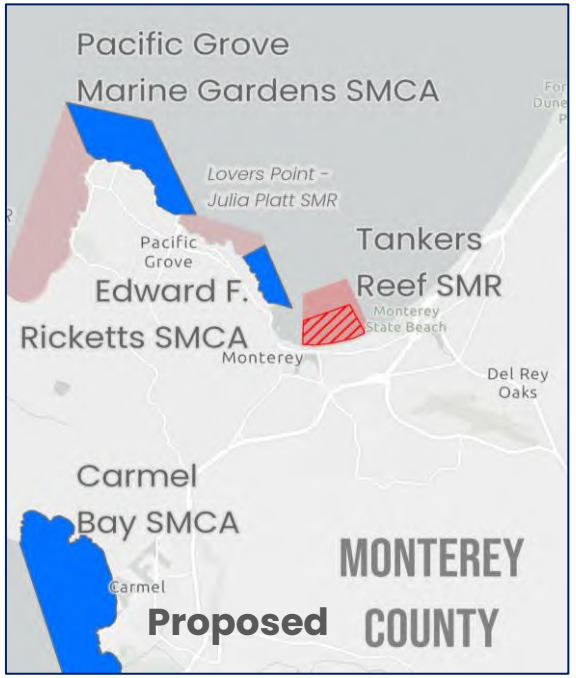


CDFW Recommendation:
DENY 2023-23MPA_3-5, 8-10, 13-15, and 17-19

2023-23MPA_20_AM1: Establish New SMR at Tanker's Reef.

Summary of Proposed Action: Establish New SMR at Tanker's Reef near Monterey (covering 193 acres, or 0.3 sq miles)





CDFW Recommendation:
DENY 2023-MPA_20_AM1

2023-23MPA_26: Allow commercial urchin harvest in MPAs for restoration.

Summary of Proposed Action:

Allow commercial urchin harvest in MPAs for kelp restoration.

CDFW Recommendation:
DENY 2023-23MPA_26

2023-23MPA: Proposed Actions 21, 22, and 24_AM1

Summary of Proposed Actions:

21. Create regulatory pathway to allow placing of artificial reef structures and sunken ship for recreational diving.

22. Allow the placement of seasonal mooring buoys in permitted restoration areas including MPAs.

24_AM1. Establish an approval process within CDFW's SCP program to grant permits of up to ten years for urchin removal and kelp restoration within MPAs.

CDFW Recommendation:
DENY 2023-23MPA_21

CDFW Recommendation:
DENY 2023-23MPA_22

CDFW Recommendation:
DENY 2023-23MPA_24_AM1

2023-23MPA: Proposed Actions 25 and 27

Summary of Proposed Actions:

25. Consider proposed kelp restoration sites as Giant Giant Kelp Restoration adopted reefs for continued kelp restoration.

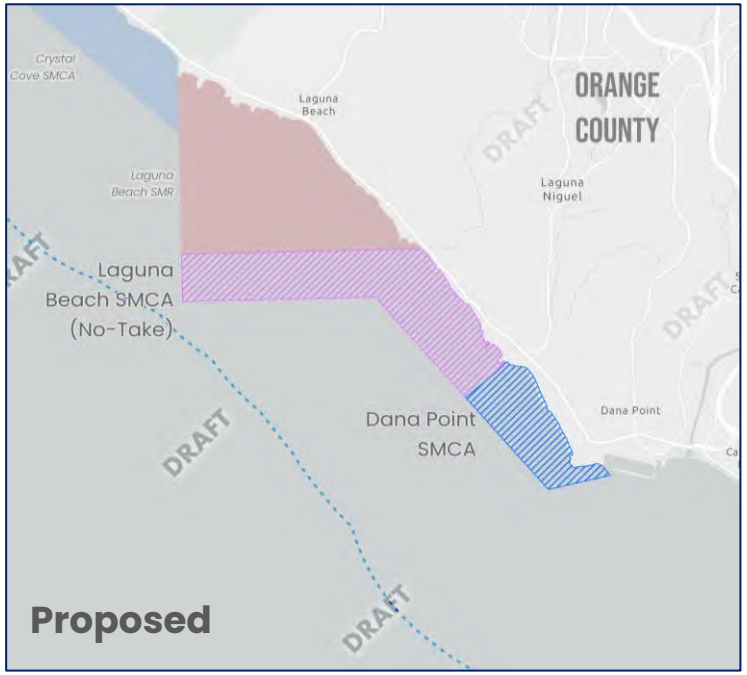
27. Grant commercial urchin divers an exemption to Wanton Waste Rule to allow for take of un-marketable urchins while participating in kelp restoration and/or allow commercial divers to take urchin under recreational rules.

CDFW Recommendation:
DENY 2023-23MPA_25

CDFW Recommendation:
DENY 2023-23MPA_27

2023-24MPA_AM: Extend the Laguna Beach No-take SMCA southern boundary to the southern border of the City of Laguna Beach.

Summary of Proposed Action: Extend the Laguna Beach No-take SMCA southern boundary to the southern border of the City of Laguna Beach, which will require modification of the northern boundary of Dana Point SMCA (modified boundaries as amended).



CDFW Recommendation:
DENY 2023-24MPA_1_AM1

2023-27MPA_AM: Amend existing Anacapa Island SMCA or Special Closure to Protect Eelgrass While Allowing for Community Access.

Summary of Proposed Action:

Amend existing Anacapa Island SMCA or Special Closure, evaluating three options (solutions) and choose the one that best protects the eelgrass meadow while allowing for community access.

2023-27MPA_AM1_1: Select best of three options to amend existing Anacapa Island SMCA or Special Closure to protect the eelgrass meadows and allow community access.

3 Petitioner Proposed Options:

i. Change Anacapa Island SMCA regulations to disallow commercial California spiny lobster (*Panulirus interruptus*) fishing year-round.

ii. Change Anacapa Island SMCA regulations to disallow hard bottomed fishing gear (including anchoring if applicable) near eelgrass meadows.

iii. Change the border of the Anacapa Island Special Closure, prohibiting the deployment of lobster traps in waters from 0-30 meters (0-98.43 feet) deep instead of the existing 0-6.1 meters (0-20 feet) deep off Anacapa Island.

CDFW Recommendation: DENY all options 2023-27MPA_AM1_1

2023-32MPA: Reclassify Duxbury Reef SMCA to an SMR and Expand the Southern and Northern Boundaries

Summary of 3 Proposed Actions:

1. Reclassify Duxbury Reef SMCA to an SMR to prohibit take.
2. Expand Duxbury Reef MPA by extending the southern boundary to encompass the southern portion of the reef
3. Expand Duxbury Reef MPA by extending the northern boundary to Double Point/Stormy Stack Special Closure.

CDFW Recommendation:
DENY 2023-32MPA_1;
GRANT in Concept 2023-32_2, 3

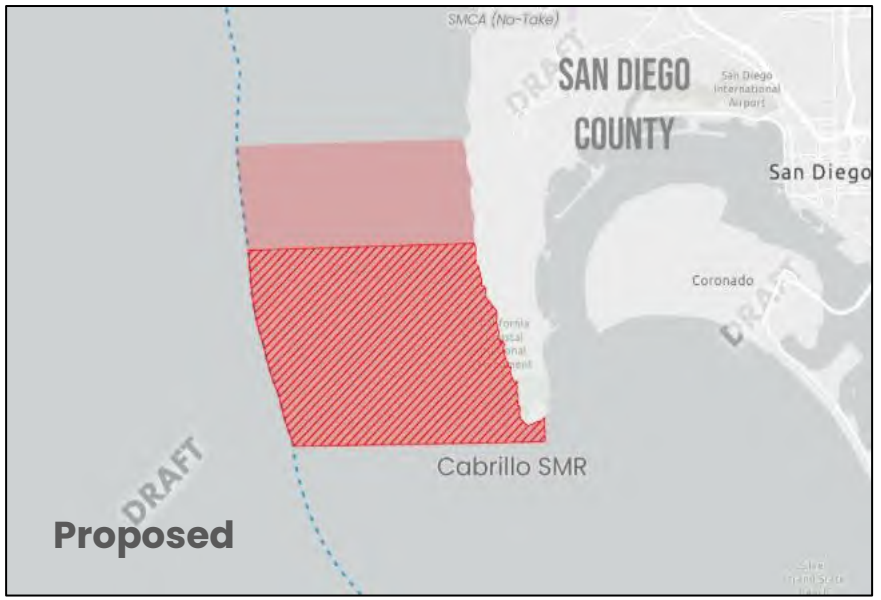
2023-33MPA_AM: Expand Boundaries of Cabrillo, Natural Bridges, Point Conception, South Point, and Gull Islands SMRs, Point Dume SMCA, Add Take at Point Dume SMCA, and Add a New SMCA at Pleasure Point

7 Proposed Actions:

1. Expand Cabrillo SMR ~9.99 sq. miles
2. Expand Point Dume SMCA ~4.6 sq. Miles, Add Take
3. Expand South Point SMR by 26.3 sq. miles
4. Expand Gull Island SMR by 1.8 sq. miles
5. Expand Point Conception SMR by 14.6 sq. miles
6. Expand Natural Bridges SMR 14.5 sq. miles
7. Designate a New 3.2 sq. mile SMCA at Pleasure Point (Santa Cruz)

2023-33MPA_1_AM1: Expand Cabrillo SMR ~9.99 sq. miles

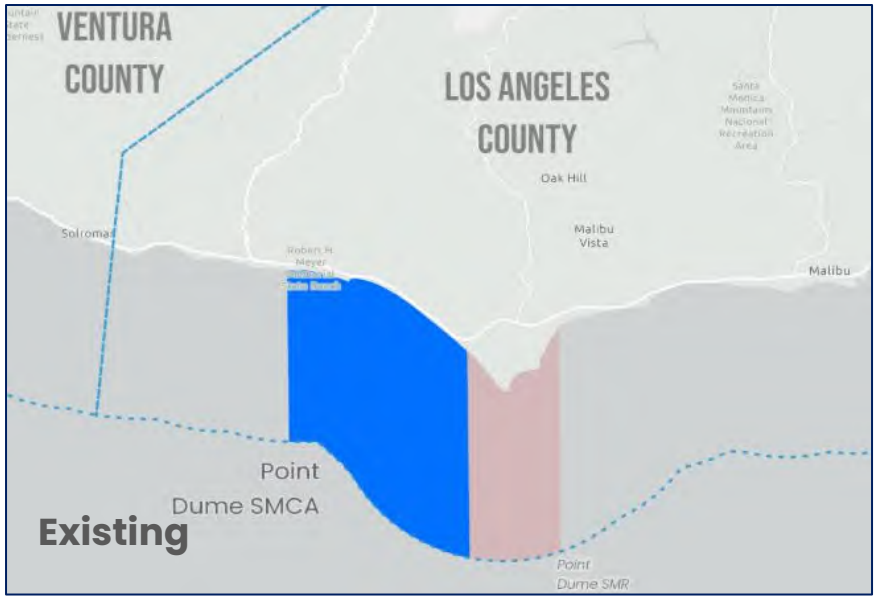
Summary of Proposed Action: Expand Cabrillo SMR westward (to 3 nautical mile state line) and northward (to New Hope Rock) by ~9.99 sq mi.



CDFW Recommendation:
DENY 2023-33MPA_1_AM1

2023-33MPA_2_AM1: Expand Point Dume SMCA ~4.6 sq. Miles, Add Recreational Take Allowance From Shore by Hook-and-Line and Spear

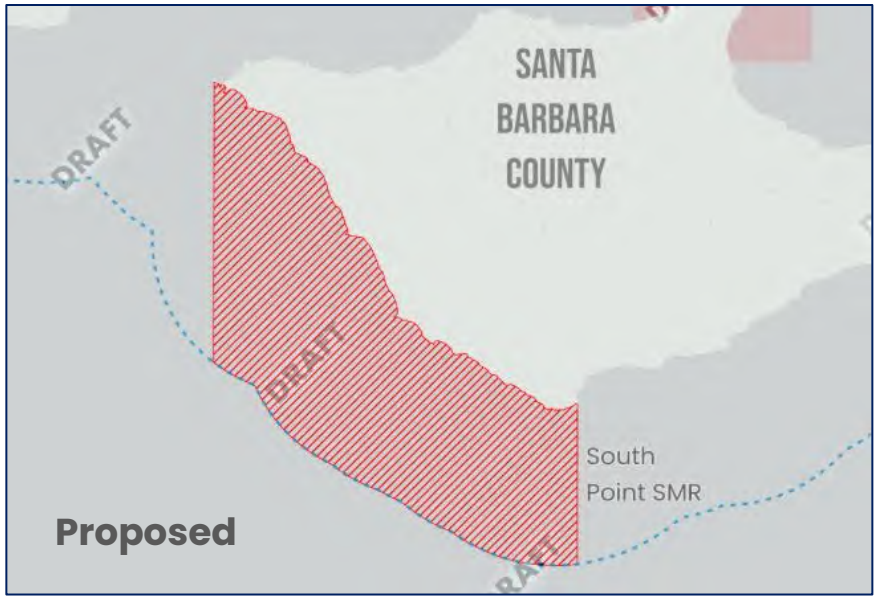
Summary of Proposed Action: Expand Point Dume SMCA westward by 4.6 sq mi and add allowance for recreational take from shore by hook-and-line and spearfishing.



CDFW Recommendation:
DENY 2023-33MPA_2_AM1

2023-33MPA_3: Expand South Point SMR by 26.3 sq. miles

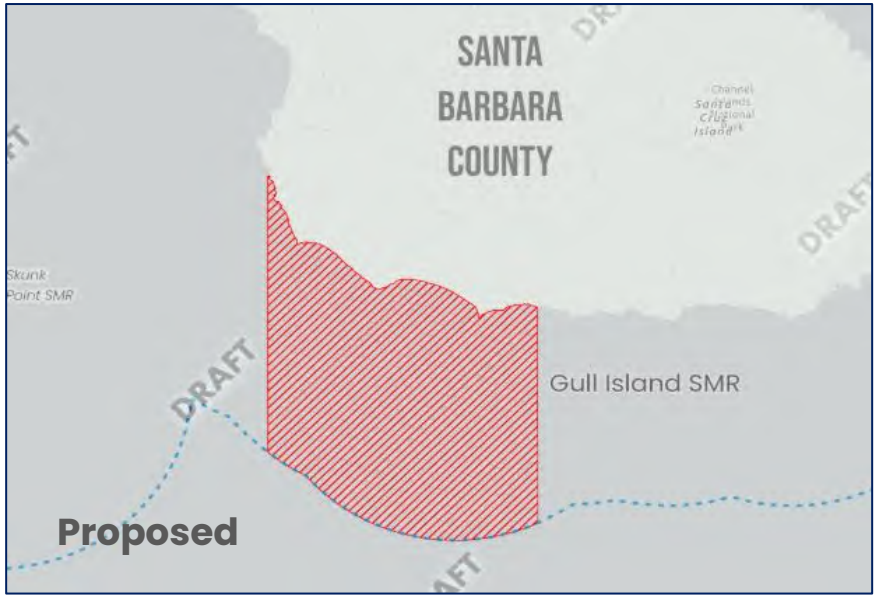
Summary of Proposed Action: Expand South Point SMR westward by 26.3 sq mi.



CDFW Recommendation:
DENY 2023-33MPA_3

2023-33MPA_4: Expand Gull Island SMR by 1.8 sq. miles

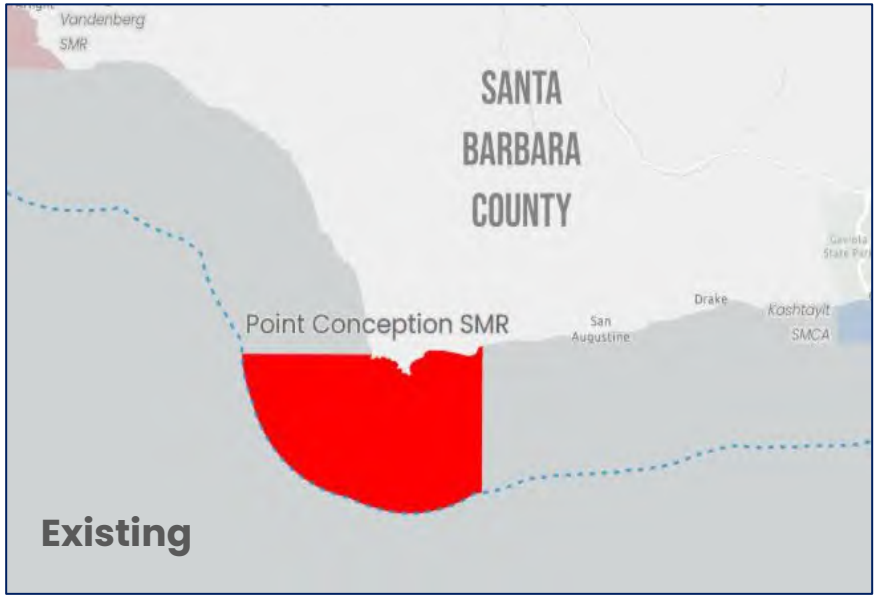
Summary of Proposed Action: Expand Gull Island SMR northward by 1.8 sq mi.

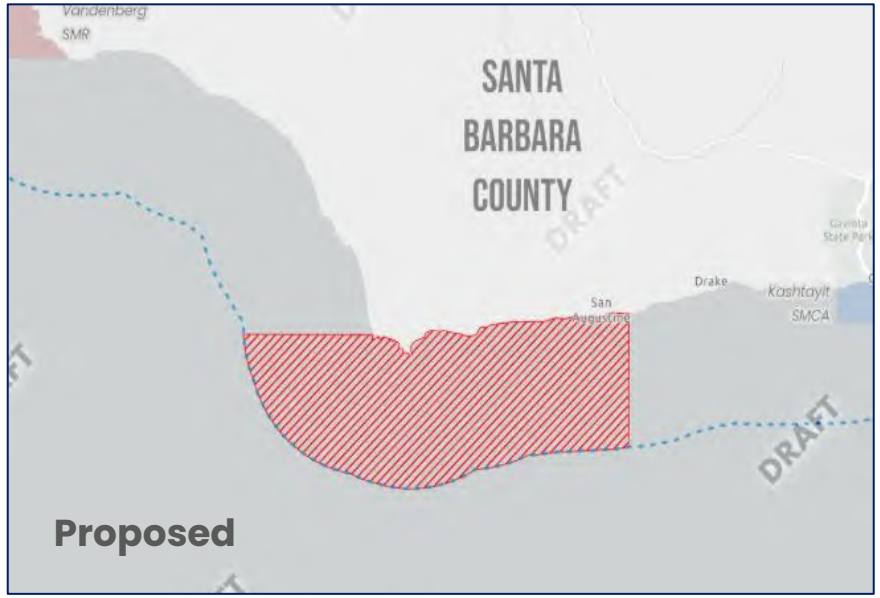


CDFW Recommendation:
DENY 2023-33MPA_4

2023-33MPA_5: Expand Point Conception SMR by 14.6 sq. miles

Summary of Proposed Action: Expand Point Conception SMR eastward by 14.6 sq mi.





CDFW Recommendation:
DENY 2023-33MPA_5

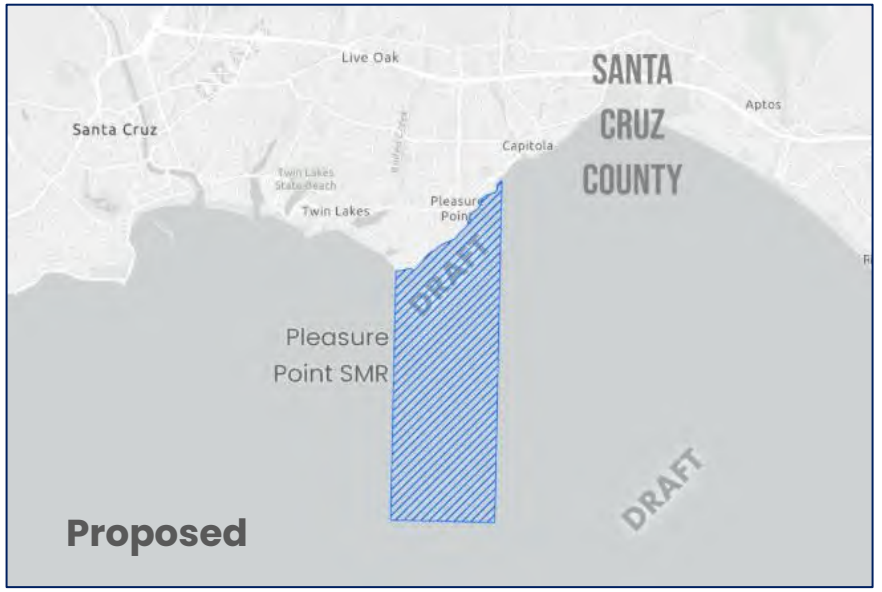
2023-33MPA_6_AM1: Expand Natural Bridges SMR 14.5 sq. miles

Summary of Proposed Action: Expand Natural Bridges SMR southward and eastward to the edge of Natural Bridges State Beach by ~14.5 sq mi.

CDFW Recommendation:
DENY 2023-33MPA_6_AM1

2023-33MPA_7_AM1: Designate a new 3.2 sq mi SMCA at Pleasure Point (Santa Cruz)

Summary of Proposed Action: Designate 3.2 sq mi. as a new SMCA near Pleasure Point (Santa Cruz); allow recreational take from shore by hook-and-line and spearfishing only.



CDFW Recommendation:
DENY 2023-33MPA_7_AM1

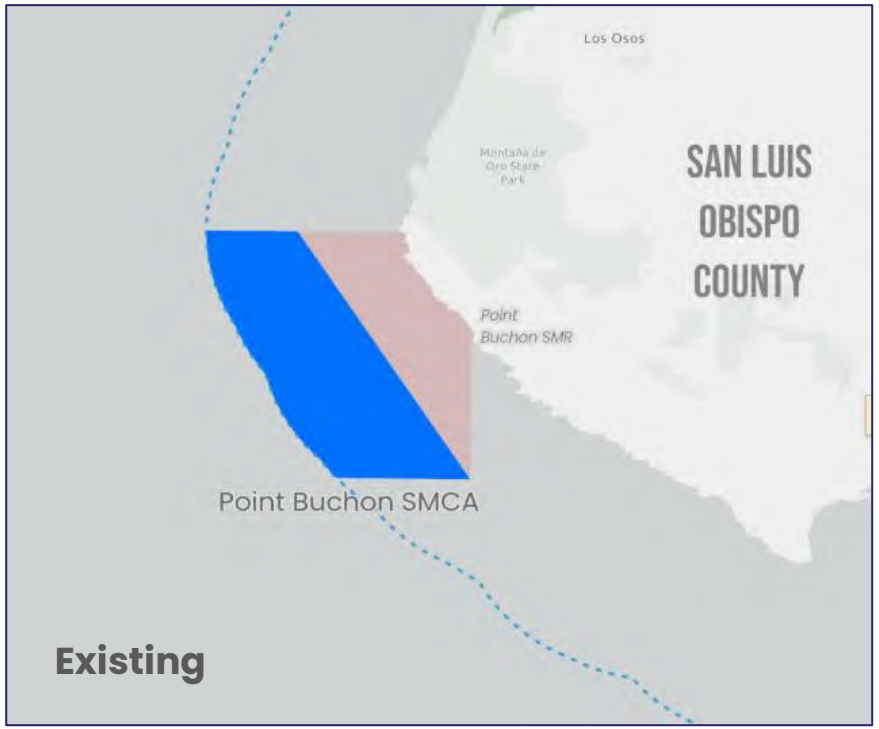
2023-34MPA: Reclassify Point Buchon SMCA to an SMR and Limit Allowable Uses at Farnsworth Onshore and Offshore SMCAs to Recreational Spearfishing

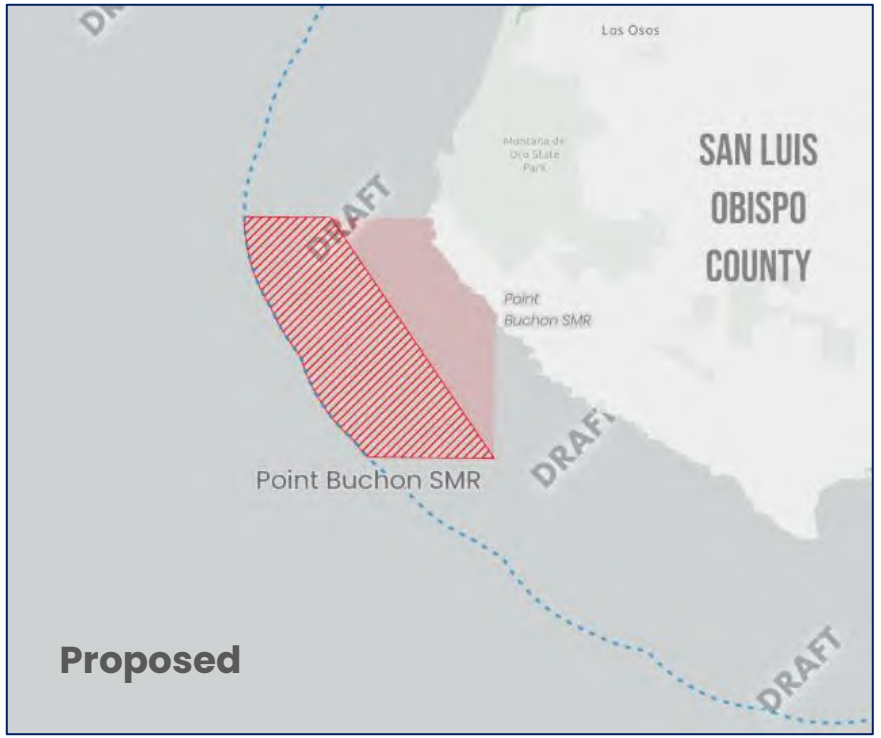
3 Proposed Actions:

1. Reclassify Point Buchon SMCA to an SMR.
2. Limit Allowable Uses Farnsworth Onshore SMCA to Recreational Spearfishing.
3. Limit Allowable Uses Farnsworth Offshore SMCA to Recreational Spearfishing.

2023-34MPA_1: Reclassify Point Buchon SMCA to an SMR

Summary of Proposed Action: Reclassify Point Buchon SMCA to an SMR to prohibit take.





CDFW Recommendation:
DENY 2023-34MPA_1

2023-34MPA_2-3: Change Farnsworth Onshore and Offshore SMCAs regulations to allow only recreational spearfishing

Summary of Proposed Actions:

Change regulations to allow only recreational spearfishing within Farnsworth Onshore and Offshore SMCA boundaries.

Existing regulations:

Offshore SMCA: allows recreational take of pelagic finfish by *hook-and-line or spearfishing*; commercial take of coastal pelagic species by round-haul net, brail gear, and light boat; and swordfish by harpoon

Onshore SMCA: allows recreational take of pelagic finfish by *spearfishing only*

Both MPAs: allows recreational take of market squid by hand-held dip net; white seabass by spearfishing; and marlin, tuna and dorado by trolling

Existing and Proposed

CDFW Recommendation:
DENY 2023-34MPA_2-3

Next Steps

- Five Tribally-led petitions: Discussed at April 14 CFGC TC
- Upcoming Regional Petition Discussion Meetings:
  - **April 21**, **San Mateo** Elks Lodge, Del Norte through Monterey counties
  - **May 5-6**, **Goleta** Hilton Garden Inn, San Luis Obispo through Santa Barbara counties
  - **May 19**, **San Clemente** Holiday Inn Express, Los Angeles through San Diego counties, including Santa Catalina Island
- For more information about regional meetings: fgc.ca.gov/Meetings/2026

CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

Recap: DMR Adaptive Management Recommendations

Near-Term (ongoing – 2 years)

- Rec 1: Improve state agencies tribal engagement
- Rec 4: Apply Review knowledge to Network/Management changes
- Rec 7: Expand outreach and education materials
- Rec 9: Continue OPC coordination
- Rec 10: Improve coordination across Management Program pillars
- Rec 11: Update Action Plan
- Rec 16: More targeted outreach to specific audiences
- Rec 17: Improve SCP process
- Rec 18: Use policy to review MPA restoration/mitigation efforts
- Rec 20: Increase enforcement capacity
- Rec 21: Enhance citation record keeping and management
- Rec 25: Implement MPA climate change research
- Rec 27: Improve understanding of MPA effects on fisheries

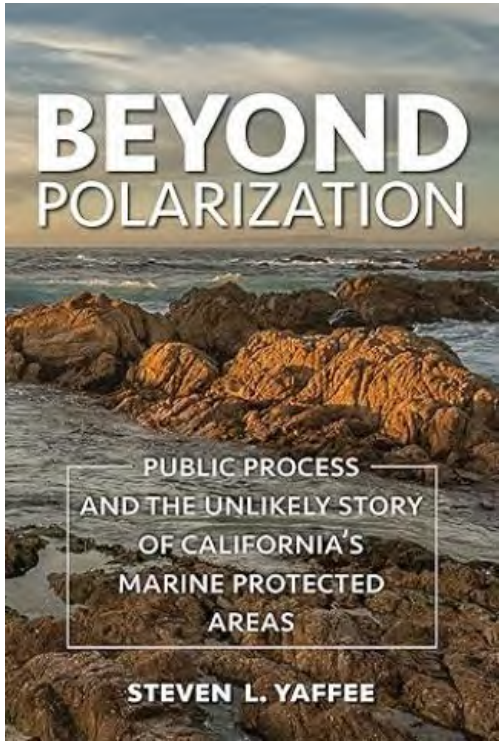
Mid-Term (2 – 5 years)

- Rec 2: Create pathway to tribal MPA management
- Rec 3: Build tribal capacity to participate in MPA management
- Rec 6: Include and fund more diverse researchers and stakeholders
- Rec 8: Evaluate MPA accessibility
- Rec 12: Improve understanding of human dimensions
- Rec 13: Explore innovative technologies
- Rec 14: Develop MPA community science strategy
- Rec 15: Evaluate Outreach needs and resource effectiveness
- Rec 22: Increase knowledge on MPA judicial outcomes
- Rec 23: Examine MPA Network design attribute more effectively
- Rec 26: Consider climate change in human dimensions monitoring
- Rec 28: Integrate influencing factors into MPA performance evaluations

Long-Term (5- 10 years)

- Rec 5: Establish targets to meet MLPA goals
- Rec 19: Create MPA Enforcement Plan
- Rec 24: Better incorporate marine cultural heritage into MPA Network

Power of Collaboration



"After almost 100 years on the planet, I now understand the most important place on Earth is not on land, but at sea"

Sir David Attenborough

CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

CALIFORNIA
OCEAN
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Wade Crowfoot | Secretary for Natural Resources | Council Chair
Yana Garcia | Secretary for Environmental Protection
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Ben Allen | State Senator
Dawn Addis | State Assemblymember
Alexis Jackson | Public Member
Megan Rocha | Public Member

March 20, 2026

California Fish and Game Commission
715 P Street, 16th Floor
Sacramento, CA 95814
Transmitted via email: fgc@fgc.ca.gov

Re: Petitions to Adaptively Manage California's Marine Protected Area Network

Dear Chair Sklar, Vice Chair Anderson and Members of the Fish and Game Commission,

Thank you for your continued leadership and partnership to manage California's Marine Protected Area (MPA) Network. As environmental threats intensify across the world's oceans and coasts, our state's MPA Network stands out as a globally recognized model of ocean conservation.

The California Ocean Protection Council (OPC) submits this letter at the request of our Chair, Secretary Wade Crowfoot, to provide input on proposals to adaptively manage California's MPA Network. OPC is grateful for the ongoing collaboration with the Fish and Game Commission and the California Department of Fish and Wildlife (CDFW) to manage the MPA Network, and our input provided here is intended to complement CDFW staff's evaluation of MPA petitions. OPC staff will follow this letter with more specific input on submitted petitions prior to the Commission's regional public meetings.

OPC's Role in the MPA Network

OPC has a unique role in the management of our MPA network that leads us to provide input on its adaptive management. OPC is statutorily responsible for the direction of MPA policy (SB 96, 2013) and in this role, we set strategic priorities for the Network, lead coordinated implementation of the State's MPA Management Program, and convene the MPA Statewide Leadership Team, an advisory body of state and federal agencies, tribal representatives, and implementation partners, to coordinate MPA management activities across the state. OPC also directs funding to manage the Network through research, monitoring, enforcement, outreach, and restoration activities, with over $110 million in state investment since 2007.

OPC's 2026-2030 Strategic Plan includes four primary goals to protect ocean health and coastal communities through the end of this decade: build resilience to climate change; maximize community benefits and stewardship; safeguard coastal and marine biodiversity; and enable a sustainable blue economy that protects ocean health.

OPC's Strategic Plan includes the explicit objective of strengthening the performance and durability of California's MPA Network. To achieve this objective, OPC staff has been directed to develop science-based recommendations to support ongoing adaptive management of the MPA Network, develop pathways for collaborative stewardship and co-management of MPAs with California Native American tribes, establish clear MPA performance targets, develop an updated MPA Monitoring Action Plan to evaluate progress toward those targets, and fund long-term monitoring of the Network.

The Strategic Plan also directs several broader actions relevant to the MPA Network: building ecosystem resilience to climate change, conserving and restoring vulnerable habitats, and supporting thriving fishing communities and climate-resilient fisheries, among other efforts.

Adaptive Management of the MPA Network

OPC views the MPA Network as California's most important marine ecosystem conservation tool, and the Network has served as a model for marine biodiversity conservation around the world. It is the only network of protected areas in the world recognized on the International Union for Conservation of Nature (IUCN) Green List of Protected and Conserved Areas. This global designation recognizes the science-based, ecologically connected and community-driven design of the Network, the state's demonstrated history of ongoing adaptive management through our comprehensive MPA Management Program, and the ecological and social benefits of the Network shown in the Decadal Management Review.

California's MPA Network also serves as a foundation to achieve the state's 30x30 law, which requires state agencies to conserve 30 percent of California's lands and coastal waters by 2030. Our State Legislature and Governor through this law have directed us on a pathway to conserve more of our state waters this decade. Marine protected areas, which cover 16.2% of state waters, achieve more than half of this legally required conservation. While adaptively managing the MPA Network through the Commission and CDFW's process is one strategy in meeting the state's 30x30 goals, it is important to emphasize that MPAs are not the only strategy to achieve this conservation target. OPC has identified additional conservation approaches to achieve 30x30 outside of the MPA Network, including supporting tribally-led conservation, such as the Chumash National Marine Sanctuary established in 2024, strengthening biodiversity protections within National Marine Sanctuaries and exploring the role of other area-based coastal and marine designations in conserving biodiversity.

The Decadal Management Review, which assessed the effectiveness of the MPA Network, clearly showed that our MPA Network is improving ocean health. This is due in large part to the fully protected, no-take State Marine Reserves that form the ecological backbone of the Network. However, the Decadal Review did not specifically explore how to strengthen the MPA Network. OPC

believes considering current petitions with this question in mind is important to adaptively manage the Network. Given OPC's explicit objective to strengthen the performance and durability of the Network into the future, our input will address whether petitions hold promise to achieve this objective.

Given OPC's commitment to strengthening the performance of the MPA Network, our staff is generally concerned about any proposals that remove existing protections within the current MPA Network. While specific petitions that recommend such changes must be addressed on a case-by-case basis, it is important to maintain the strength of the existing Network, which leaves over 90% of state waters open for fishing, with 84% of state waters having no MPA-related restrictions on fishing.

MPA Conservation Amidst Climate Change and other Environmental Challenges

Climate change is already affecting marine life and habitats, with impacts expected to increase over time. The catastrophic collapse of kelp forest ecosystems off California's North Coast is just one example of how climate change can cause, accelerate or compound other stressors facing California's coast and ocean. Climate impacts also often have cascading effects, not just for ecosystems but for coastal economies and communities that rely on a healthy ocean.

MPAs are a tool to protect full ecosystems, and although the role of MPAs in supporting climate resilience is the subject of ongoing scientific study, species and habitats inside MPAs across the globe have been shown to better withstand and rebound from climate-driven impacts than unprotected areas. Scientific evidence suggests that the protections provided by MPAs – such as maintaining genetic diversity, keeping food webs intact, and supporting large population sizes – can help buffer climate impacts and help serve as an "insurance policy" against future uncertainty. MPAs can also help mitigate climate change by protecting habitats that sequester carbon, such as wetlands and seagrass meadows.

California's MPA Network likely already provides important climate resilience benefits by functioning as an ecologically connected statewide network and protecting multiple types of habitats. However, adaptive management represents a critical opportunity to bolster these benefits, for example by ensuring that vulnerable ecosystems are adequately represented in the Network, or by identifying and protecting areas that will become new safe havens as species move northward with warming water.

Prioritizing Tribal Stewardship and Co-Management

California Native American tribes have stewarded the lands and waters of what is now known as California since time immemorial. Revitalizing tribally-led conservation and protecting places with biocultural significance, which reflects the fundamental interconnectedness of people and place, is a key priority for the Newsom Administration and is critical to healing past harms and protecting and restoring nature.

OPC's 2026-2030 Strategic Plan and the recommendations in the Decadal Management Review highlight tribal MPA co-governance and co-management as a top priority for the state. Creating a clear path to tribal co-governance, co-management, and collaborative stewardship of MPAs – whether that is focused on existing MPAs or new MPAs proposed by tribes – can help reconnect tribes to their ancestral waters, cultural lifeways, and traditional stewardship practices, ultimately supporting improved tribal community well-being as well as providing strong benefits for biodiversity. OPC is highly supportive of adaptive management actions that advance co-governance, co-management, and collaborative stewardship with tribes.

Support Thriving Fishing Communities and Climate-Resilient Fisheries

OPC recognizes the critical importance of enabling a sustainable blue economy that protects ocean health, of which fishermen and fishing communities are central. Myriad environmental stressors have diminished health of our fisheries over the last decade: extreme events such as extended droughts; changing ocean conditions that generate new threats such as expanded domoic acid outbreaks; marine ecosystem breakdown including collapse of kelp forest ecosystems; pollution into our coastal waters; and impaired river health through excessive historic diversions.

Our MPA Network is one important response to protect and restore the health of our fisheries over the long term to weather these changes, given clear evidence that protected areas generate healthier ecosystems that provide the basis of sustainable, abundant fisheries into the future. It should be noted that the sum total of current petitions before the Commission to strengthen the Network covers only 2.1% of coastal waters. If all petitions were adopted, 83% of state waters would remain open to fishing.

OPC believes a strong, resilient MPA network is essential both for the environmental health of our ocean and the future abundance of our fisheries. We also deeply value the fishermen and fishing communities that help support California's booming coastal economy and are critical partners in our efforts to understand ecosystem shifts and safeguard marine life and habitats. OPC will continue to prioritize collaboration and investments that help fishermen and fishing communities adapt and thrive as climate-driven impacts accelerate the need for flexible and innovation solutions. This includes investments that reduce entanglement in fishing gear to protect whales while keeping fishermen on the water, promote California wild-caught seafood, improve waterfront infrastructure, and advance planning that supports community sustainability and resilience.

Input on Specific Petitions

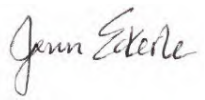
In coming weeks, OPC plans to provide specific input on existing petitions through our MPA policy lens articulated in this letter. We believe this can complement the rigorous assessment that CDFW staff completed of petitions under a separate set of questions and criteria established by the Commission. We will provide this input and recommendations in advance of the Commission's public meetings on these petitions.

We recognize and appreciate that CDFW's evaluation recommendations are based on petition amendments that were received by the March 2025 deadline. CDFW staff quite reasonably needed to establish a deadline after which new proposed revisions to the petitions could not be assessed in their evaluation. We also understand that many petitioners have been working for months to revise their petitions to be responsive to community feedback and concerns. OPC's policy recommendations will be based on the petitions as currently amended.

Lastly, we are deeply appreciative of all the Commission is doing to provide a clear, accessible venue to collect the full range of perspectives on these MPA petitions. We value and respect this diversity of perspectives and are committed to finding creative solutions that reflect the range of tribal, conservation and fishing priorities in the state, with a shared goal of ensuring a healthy and thriving ocean for all Californians, now and into the future.

Please do not hesitate to reach out to me with questions or to discuss our shared efforts.

Sincerely,



Jenn Eckerle
Executive Director

cc:
Melissa Miller-Henson, FGC Executive Director
Susan Ashcraft, FGC Marine Advisor
Meghan Hertel, CDFW Director
Craig Shuman, CDFW Marine Region Manager